

Wealden District Council

# Wealden Local Plan Sustainability Appraisal Scoping Report

November 2020

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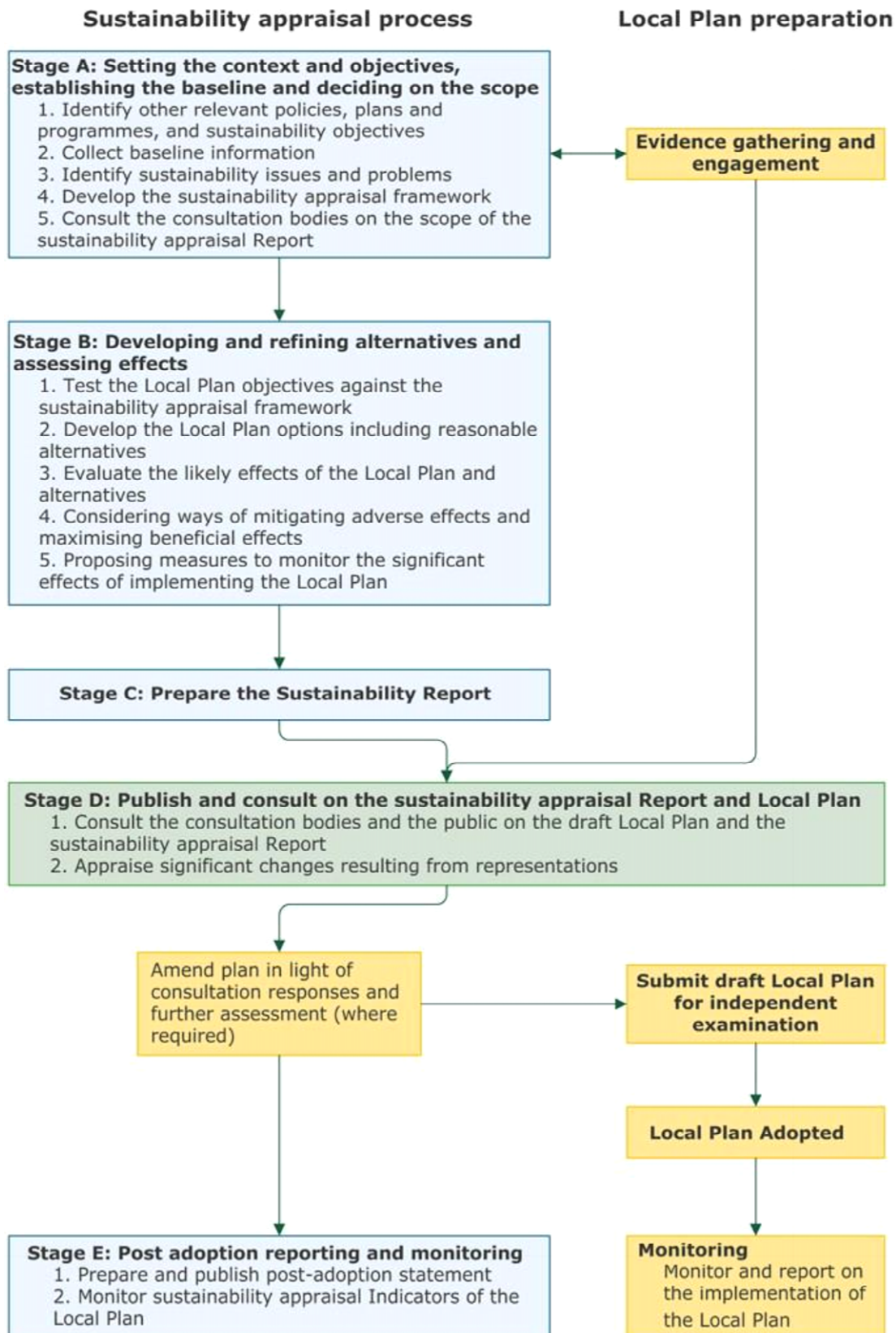
# 1. Introduction

1.1 Wealden District Council (WDC) is developing a new Local Plan for the area in order to bring planning policies up to date and ensure they are fit for purpose. The plan making process will involve collaboration and partnership working with neighbouring authorities as well as other relevant stakeholder's i.e. environmental bodies, infrastructure providers, Parish and Town Councils and also our communities. Evidence base work will also be required to inform the direction of the plan.

1.2 To support the development of the new Local Plan, the Council is required to undertake a Sustainability Appraisal (SA). The purpose of the sustainability appraisal process is to test the social, environmental and economic effects of the plan from the outset. In doing so it will help ensure that decisions are made that contribute to achieving sustainable development, as required by the National Planning Policy Framework (2019).

1.3 The sustainability appraisal is integral to the plan making process and it performs a key role in providing a sound evidence base for the plan, as well as being an integrated part of the plan preparation process (see Figure 1). It will inform the decision making process and evaluation of alternatives and will help demonstrate that the plan is the most appropriate, given the reasonable alternatives. Ultimately, the Sustainability Appraisal is at the heart of plan making, generating options and alternatives to improve policy formulation.

**Figure 1: Relationship of the SA and Local Plan Process**



## The District

1.4 Wealden District is defined as a mainly rural district and covers some 835 square kilometres, with around 53% of it being located within the High Weald AONB in the north and around 7% being within the South Downs National Park in the south. It currently has a population of around 161,475 with a forecast growth of 9.5% by 2038, based on trend based population projections. The district has an older age profile with a forecast growth in the over 65's bracket of 33.3% by 2038, based on trend based population projections.

1.5 Within the district, the greatest proportion of employment is in the public administration, education and health sectors. In terms of the overall level of deprivation based on the Index of Multiple Deprivation (IMD) statistics, Wealden is ranked 254 most deprived out of 317 Local Authorities nationally overall, with 1 being the most deprived. There are however pockets of deprivation within the district, for example within Hailsham.

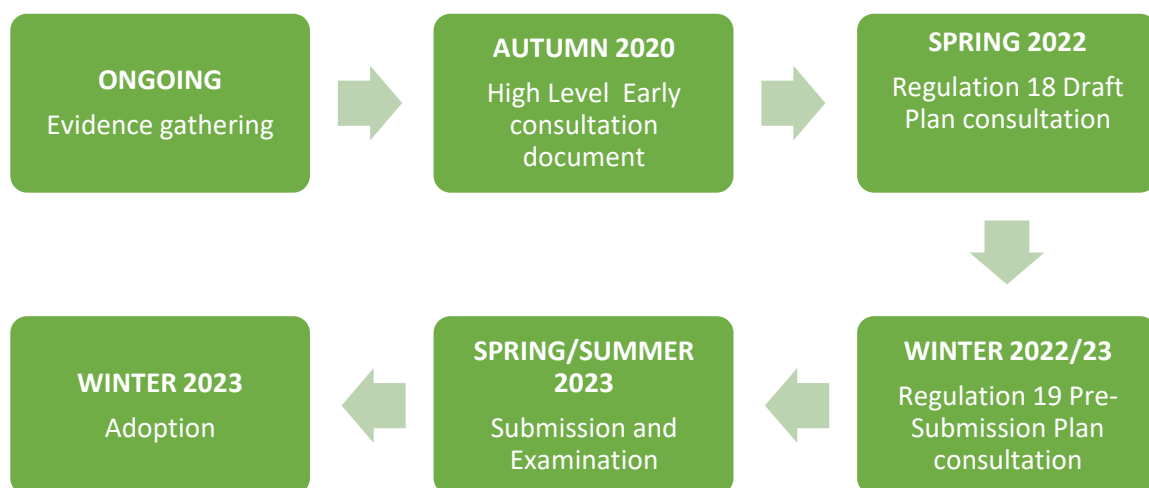
## The Local Plan

1.6 The Local Plan will set out the vision and spatial development strategy for Wealden District for the period 2018-2038. The local plan will include both strategic and non-strategic planning policies. The plan will also identify site allocations for different land uses such as housing, employment, retail and leisure, health, education, open spaces as well as seek to address climate change and protect the natural and built environment. It will also provide development management policies to achieve the vision and ensure growth within the district is sustainable.

1.7 A key aspect for the Plan to address will be the provision of housing within the district. The standard methodology for calculating local housing need as outlined in the NPPF results in a significant increase in housing delivery of approximately 1,230 homes per year in Wealden, compared to the presently adopted target of 450 homes per year. This 'standard method' provides the **starting point** for assessing housing need within Wealden but is not a housing requirement. However, it is clear that Wealden will need a plan that supports a step change and maximises housing delivery. The Plan will need to deliver growth in the district, as well as respond to other important spatial planning objectives, such as protecting the environment and climate change.

1.8 The expected programme for developing the Local Plan and its associated documents, including the Sustainability Appraisal, is illustrated in Figure 2.

**Figure 2: Stages in the Wealden Local Plan preparation**





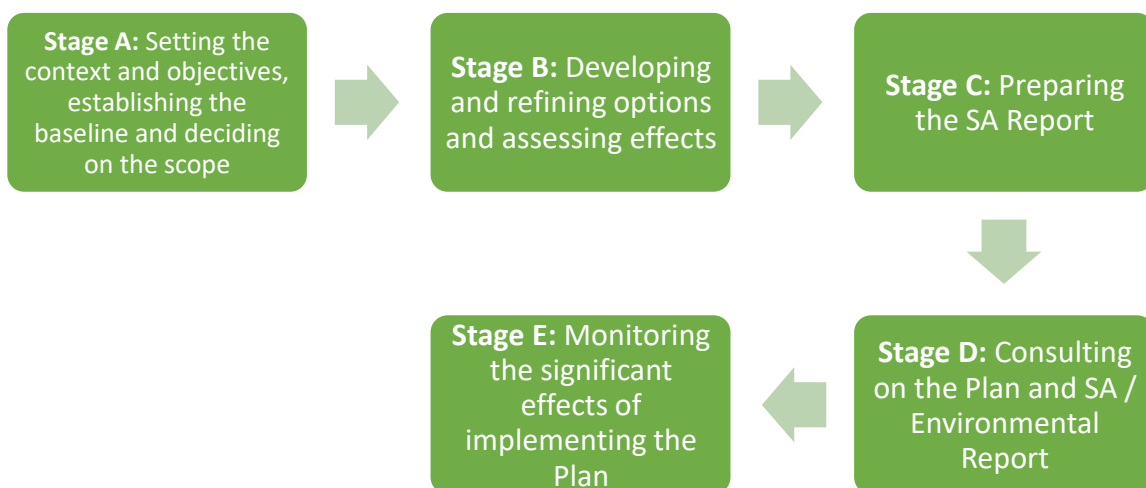
## 2. Sustainability Appraisal and Strategic Environmental Assessment

2.1 The Planning and Compulsory Purchase Act 2004 establishes the legal framework, outlining the requirements for the SA of local plans. The SA process must be undertaken in accordance with the SEA Regulations<sup>1</sup>, which transpose the requirements of the Strategic Environmental Assessment Directive (European Directive 2001/42/EC) into UK law. Therefore, it is a legal requirement for the Local Plan to be subject to SA and SEA throughout its preparation.

2.2 Strategic environmental assessment (SEA) considers only the environmental effects of a plan, whereas sustainability appraisal (SA) considers the plan's wider economic and social effects in addition to its potential environmental impacts. Whilst the requirements to carry out SA and SEA are distinct, it is possible to satisfy both using a single appraisal process (as advocated in the National Planning Practice Guidance<sup>2</sup>), whereby users can comply with the requirements of the SEA Regulations through a single integrated SA process – this is the process that will be undertaken in relation to the Wealden Local Plan. From here on, the term 'SA' should therefore be taken to mean 'SA incorporating the requirements of the SEA Regulations'.

2.3 The Planning Practice Guidance (PPG) sets out five stages to the SA process for Local Plans (Stages A to E) which are illustrated in Figure 3. The first stage of the SA (Stage A) is to identify the scope and level of detail of the information to be included in the sustainability appraisal report. It should set out the context, objectives and approach of the assessment and identify relevant environmental, economic and social issues and objectives.

Figure 3: Five stages to SA



<sup>1</sup> The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004 No. 1633)

<sup>2</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

2.4 Legislation requires that the SA report must be published alongside the Local Plan<sup>3</sup>. The SA must identify, describe and evaluate the likely **significant** effects of implementing the Local Plan, and ‘reasonable alternatives’ on SA issues which must include: biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage and landscapes<sup>4</sup>.

## European Directives

2.5 At the international level, Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the ‘SEA Directive’) and Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the ‘Habitats Directive’) are particularly significant as they require Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) to be undertaken in relation to an emerging Local Plan.

2.6 These processes should be undertaken iteratively and integrated into the production of the Local Plan in order to ensure that any potential negative environmental effects (including on international nature conservation designations) are identified and can be mitigated, as required.

2.7 There are a wide range of other international agreements and EU Directives, which have been transposed into UK law and national policy, which are detailed in Appendix A, along with national and local plans, policies and programmes.

## National Planning Policy Framework (NPPF) 2019

2.8 The most significant national policy context for the Local Plan is the National Planning Policy Framework (NPPF) published in 2019. The SA process must be consistent with the requirements of the NPPF, which states:

*“Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements<sup>5</sup>. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).*

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<sup>3</sup> Regulation 13 of the Environmental Assessment of Plans and Programmes Regulations 2004  
<http://www.legislation.gov.uk/uksi/2004/1633/part/3/made>

<sup>4</sup> Schedule 2(6) of the SEA Regulations <http://www.legislation.gov.uk/uksi/2004/1633/schedule/2/made>

<sup>5</sup> The reference to relevant legal requirements refers to Strategic Environmental Assessment. Neighbourhood plans may require Strategic Environmental Assessment, but only where there are potentially significant environmental effects

## The Sustainability Appraisal Scoping Report

2.9 The Scoping report forms the first stage, Stage A, of the sustainability appraisal process and sets the context and scope of the SA in accordance with best practice guidance. This first stage is sub divided into five tasks, as illustrated in Table 1.

Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope	
Stage A1	Setting out the policy context for the SA of the Wealden Local Plan, i.e. key Government policies and strategies that influence what the Local Plan and the SA needs to consider.
Stage A2	Setting out the baseline for the SA of the Local Plan, i.e. the current and likely future environmental, social and economic conditions in the district.
Stage A3	Drawing on A1 and A2, identify the particular sustainability problems and/or opportunities ('issues') that the Local Plan and SA should address.
Stage A4	Drawing on A1, A2 and A3, develop a framework of SA Objectives and assessment criteria to appraise the constituent parts of the Local Plan in isolation and in combination.
Stage A5	Consulting on the scope of the SA.

**Table 1: Key tasks of Stage A**

2.10 This SA Scoping Report incorporates the requirements of the Strategic Environmental Assessment (SEA) Directive (2001/42/EC) and forms the basis for consultation with the statutory consultation bodies for England: the Environment Agency, Natural England, and Historic England.

2.11 The SA scoping process has been undertaken in accordance with government guidance contained within Planning Practice Guidance (PPG)<sup>6</sup>. This report presents the findings of Stage A which has culminated in a proposed framework of **18 sustainability objectives** that will be used to undertake the SA of the Local Plan. These sustainability objectives are informed by an assessment of the **key issues/problems** arising from a review of:

- Existing plans and programmes published by Government, regional partnership bodies such as the Local Economic Partnership, East Sussex County Council, other neighbouring local planning authorities or other key organisations;
- baseline evidence on the existing environmental, economic and social characteristics of the area likely to be affected by the Local Plan; and
- the likely evolution on the above without the implementation of new policies contained in the Local Plan.

2.12 A list of the plans and programmes reviewed (Stage A1) is detailed in Appendix A. The baseline information is presented thematically in Chapter 3 and includes a summary of the key findings from the review of plans and programmes, as

<sup>6</sup> <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

they relate to each theme, as well as identifying the sustainability issues. This addresses Stages A1 – A3 of the process.

2.13 Chapter 5 takes the information from Chapter 3 and presents the 18 Sustainability Objectives that have been developed to assess the Local Plan at each stage of its development. These are accompanied by guidance questions to assist in the assessment process, although these questions should not be treated as an exhaustive list. This covers Stage A4 of the process.

2.14 Finally, Chapter 6 details the consultation process for the SA Scoping Report including who was consulted and the timescales within which the consultation took place. Chapter 6 also identifies the next steps in the SA process. This covers Stage A5 of the process.

2.15 Where this SA Scoping Report meets the requirements of the SEA Regulations, this is highlighted in a green text box at the beginning of the chapter.

## **Review of Policies, Plans and Programmes**

2.16 A full list of the policies, plans and programmes (PPPs) reviewed, as required by Task A1 of the SA Scoping process, is provided in Appendix A. This gives a summary description of the PPPs together with their general objectives, key aims and where they can be found.

2.17 Within Chapter 3, the key findings from the PPP review are included for each theme, as relevant and applicable, under ‘sub-chapters’. This mainly focuses on the national and local PPPs, as the objectives and requirements of international and European strategies and Directives are now sufficiently well established to have translated down into the lower tier PPPs. However, where relevant and useful in terms of context, higher level PPPs are included.

2.18 It is important to note that the review of PPPs (Chapter 3 and Appendix A) is a snapshot in time only. The review of new PPPs will continue throughout the process of preparing the Local Plan. This is particularly pertinent given the fact that the UK has left the EU, with the transition period coming to an end on 31<sup>st</sup> December 2020 (notwithstanding any extensions). After the transition period ends, EU legislation and directives shall no longer apply to the UK. However, many of the requirements / objectives of EU legislation and Directives have already been transposed into UK legislation and the government is seeking to ensure there is no policy vacuum through the provisions in the Environment Bill and other primary and secondary legislation.

2.19 Any updates to PPPs following the end of the transition period and beyond shall be factored into later stages of the SA process and Local Plan.

## **Habitats Regulations Assessment (HRA)**

2.20 Under Article 6 (3) and (4) of the Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive) land-use plans,

including Development Plan Documents, are also subject to Habitats Regulations Assessment (HRA).

2.21 A HRA refers to the several distinct stages of Assessment which must be undertaken in accordance with the [Conservation of Habitats and Species Regulations 2017 \(as amended\)](#) 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.

2.22 The Habitat Regulations set out a requirement for a Habitat Regulations Assessment (HRA) to be applied to all land use plans to assess the potential effect of a plan against the conservation objectives of European Sites including Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and, under UK Government policy, Ramsar sites.

2.23 Under the Habitat Regulations (Regulation 63, 105 and 106), competent authorities (such as District Councils) have a duty to undertake an appropriate assessment where a land use plan or any other regulatory activity, including projects and programmes, is likely to have a significant effect on a European site.

2.24 The purpose of an Appropriate Assessment is to assess the implications of a plan against the conservation objectives of the European site, and to ascertain that the plan would not, even in combination with other plans or projects, adversely affect the integrity of the site.

2.25 The Habitats Directive applies the precautionary principle to European sites when assessing whether the effects of a plan are significant. This means that a plan can only be permitted after it has been determined that there will be no adverse effect on the integrity of the site(s) in question.

2.26 Within Wealden there are the following sites of European importance that fall within the sphere of the Habitats Regulations:

- Ashdown Forest SAC;
- Ashdown Forest SPA;
- Pevensey Levels SAC; and
- Pevensey Levels Ramsar site.

2.27 The new Wealden Local Plan may affect one or more of these designated sites and therefore a Habitats Regulations Assessment will be required.

2.28 The Sustainability Appraisal will need to take account of the findings of any Habitats Regulations Assessment that is carried out on the new Wealden Local Plan, as per national planning guidance<sup>7</sup>. The SA/SEA process and the HRA process should work collaboratively and in step with each other.

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<sup>7</sup> National Planning Practice Guidance (NPPG) Paragraph: 011 Reference ID: 11-011-20140306  
<https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

### 3. Baseline Context and Sustainability Issues

**Task A2: Develop baseline information and characterise the district and Task A3: Identify sustainability issues and problems**

*“...the relevant aspects of the current state of the environment and the likely evolution thereof without the implementation of the plan or programme”*

**Annex 1 (b) of the EU Directive 2001/42/EU and Schedule 2(2) of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations)**

*“...the environmental characteristics of areas likely to be significantly affected”*

**Annex 1 c) of the EU Directive 2001/42/EU and Schedule 2(3) of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations)**

*“...any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance...”*

**Annex 1 (d) of the EU Directive 2001/42/EU and Schedule 2(4) of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations)**

*“...the environmental protection objectives, established at international, community or Member State level, which are relevant to the plan or programme...”*

**Annex 1 (e) of the EU Directive 2001/42/EU and Schedule 2(5) of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations)**

#### 3.1 Introduction

3.1.1 The term ‘baseline information’ refers to the existing environmental, economic and social characteristics of the area likely to be affected by the plan, and their likely evolution without the implementation of new policies. It provides the basis against which to assess the likely effects of alternative proposals in the draft plan. The NPPG<sup>8</sup> states that wherever possible, data should be included on historic and likely future trends, including a ‘business as usual’ scenario (i.e. anticipated trends in the

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<sup>8</sup> Paragraph 016 Reference ID: 11-016-20190722. Revision date 22<sup>nd</sup> July 2019  
<https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal#strategic-environmental-assessment-and-sustainability-appraisal>

absence of new policies being introduced). This information will enable the potential effects of the implementation of the plan to be assessed in the context of existing and potential environmental, economic and social trends.

3.1.2 It is important to understand the current state of the environmental, social and economic landscape in Wealden in order to identify the key sustainability issues facing the district. This will allow for the specific issues to be addressed and accounted for during the development of the local plan and its policies, whilst also providing the means to judge their impact and effectiveness moving forward.

3.1.3 The following Chapters detail the baseline data and use it to characterise the district. Because SA/SEA is an iterative process it may be that future stages identify other data that need to be collected and monitored.

3.1.4 Chapters 3.2 – 3.20 are presented under a number of themes and these are used to identify and discuss the baseline information for the district as well as the key sustainability issues to be addressed and how the Local Plan and SA/SEA may approach this. The themes used are in conformity with the topic headings listed in Schedule 2 of the SEA Regulations.

3.1.5 Table 2 identifies the connections, with many topics having cross overs i.e. Leisure, recreation and open space can be a social and economic topic area. The baseline information is presented in separate chapters under each themes for ease of use by the reader, but it is acknowledged that many topic areas are inter-related.

<b>SA Topic</b>	<b>SEA Topic</b>
<b>Environmental</b>	
Climate Change including renewable energy	<i>Climatic factors, biodiversity, Human Health, air, water. Material assets</i>
Natural Environment	<i>Biodiversity, fauna, flora, soil, water, landscape</i>
Water Resources	<i>Water, biodiversity, climatic factors</i>
Flooding	<i>Water, human health, climatic factors</i>
Soil and Land Contamination	<i>Soil</i>
Air Quality	<i>Air, human health, biodiversity, climatic factors</i>
Waste and Recycling	<i>Climatic factors, material assets</i>
Historic Environment	<i>Cultural heritage including architectural and archaeological heritage</i>
<b>Social</b>	
Population including Indices of multiple deprivation and disability	<i>Population, human health, material assets</i>
Social Care	<i>Population, human health</i>
Housing	<i>Population, human health, material assets</i>



SA Topic	SEA Topic
Health and Wellbeing including crime and community safety	<i>Population, Human health, biodiversity, landscape</i>
Leisure, recreation and open space	<i>Human health, material assets, landscape, biodiversity</i>
Education and Qualifications	<i>Population</i>
<b>Economic</b>	
Economy and Employment	<i>Material assets, population, human health</i>
Tourism	<i>Material assets, population; Landscape; Climatic factors</i>
Town Centres	<i>Material assets</i>
Transport and Communications	<i>Material assets, population, climatic factors</i>

**Table 2: SA themes and SEA topics**

## 3.2 Climate Change

### Relevant Plans, Policies and Programmes (PPPs)

#### International

3.2.1 At the international level the following PPPs are relevant to climate change:

- UN Paris Climate Change Agreement (2016)
- Kyoto Protocol on Climate Change, United Nations, 1997
- UN Resolution 2015 Transforming our world: The 2030 Agenda for Sustainable Development (Goal 13 'Climate Action' and Goal 7 'Affordable and Clean Energy')
- IPCC special report on the Impacts of Global Warming above 1.5°C

3.2.2 Fundamentally these PPPs are all concerned with acting globally to address the issue of climate change and its impacts on the environmental, social and economic fabric of the world. Their aims and objectives have been incorporated into the lower tier of PPPs.

#### European

3.2.3 At the European level the most relevant PPPs to climate change are:

- **European Floods Directive (2007)** – This provides a framework for the assessment and management of flood risk and requires Member States to take into consideration long term developments, including climate change, in the flood risk management cycle;
- **European Energy Performance of Buildings Directive (2010) and the Energy Efficiency Directive (2012)** – These pieces of legislation establish the framework for boosting the energy performance of buildings, which will help to achieve a highly efficient and decarbonised building stock by 2050, leading to a reduction in emissions;



- **European Union Industrial Emission Directive** – This Directive is, in essence, about minimising pollution from various industrial sources throughout the European Union i.e. reducing emissions of air pollutants from large combustion plants.

## National

3.2.4 The Climate Change Act (2008) is the basis for the UK's approach to tackling and responding to climate change. It requires that emissions of carbon dioxide and other greenhouse gases are reduced and that climate change risks are prepared for. The Act also establishes the framework to deliver on these requirements.

3.2.5 Through the Climate Change Act (2008), the UK government set a target to significantly reduce UK greenhouse gas emissions by 2050 and a path to get there. The Act also established the [Committee on Climate Change](#) (CCC) to ensure that emissions targets are evidence-based and independently assessed.

3.2.6 In addition, the Act requires the Government to assess the risks and opportunities from climate change for the UK, and to prepare for them. The CCC's [Adaptation Sub-Committee](#) advises on these climate change risks and assesses progress towards tackling them.

3.2.7 In an amendment to the the Climate Change Act in 2019 the UK government now commits, by law, to net zero greenhouse gas emissions by 2050. This includes reducing emissions from the devolved administrations (Scotland, Wales and Northern Ireland), which currently account for about 20% of the UK's emissions. The 100% target was based on advice from the CCC's 2019 report, '[Net Zero – The UK's contribution to stopping global warming](#)'.

3.2.8 The Climate Change Act requires the government to set legally-binding '[carbon budgets](#)' to act as stepping stones towards the 2050 target. A carbon budget is a cap on the amount of greenhouse gases emitted in the UK over a five-year period. Budgets must be set at least 12 years in advance to allow policy-makers, businesses and individuals enough time to prepare and the CCC advises on the appropriate level of each carbon budget. The first five carbon budgets have been put into legislation and run up to 2032.

3.2.9 The Clean Growth Strategy sets out the UK's reaffirmed ambition to promote the ambitious economic and environmental policies to mitigate climate change and deliver clean, green growth – all of which will have beneficial effects on people and the population.

3.2.10 The Department for Transport document, The Road to Zero (2018) sets out new measures towards cleaner road transport, aiming to put the UK at the forefront of the design and manufacturing of zero emission vehicles. It explains how cleaner air, a better environment, zero emission vehicles and a strong, clean economy will be achieved. One of the main aims of the document is for all new cars and vans to be effectively zero emission by 2040. The government is currently consulting on whether to bring forward this deadline to 2035.

3.2.11 In terms of the planning and development sector, the National Planning Policy Framework (NPPF) 2019<sup>9</sup> provides the strategic basis for tackling climate change in the UK. As the whole premise of the NPPF is to achieve sustainable development, this means that the framework as a whole inherently seeks to address climate change through avoidance, mitigation and adaptation and has inter-related policies i.e. renewable energy and climate change. Specifically, in relation to climate change the NPPF states that:

- The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure (para 148);
- Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure. (para 149);
- New development should be planned for in ways that avoid increased vulnerability to the range of impacts arising from climate change and that help to reduce greenhouse gas emissions i.e. through its location and design (para 150);
- All plans should apply a sequential, risk-based approach to the location of development – taking into account the current and future impacts of climate change (para 157); and
- Plans should take account of the effects of climate change in the long term, taking into account a range of factors including flooding. Adopt proactive strategies to adaptation and manage risks through adaptation measures including well planned green infrastructure.

3.2.12 The role of natural habitats in addressing climate change not only comes in the form of, for example, providing wildlife corridors for species migration or tree planting to combat excess heat/rainfall, they also act as carbon stores and help sequester excess CO<sub>2</sub> from the air. For most habitats, the majority of carbon stored is held in the soil – although the role of above and below ground biomass is also important. Whilst woodland is important, other habitats also store carbon and the destruction and/or degradation of habitats tends to result in the release of carbon into the atmosphere. Conversely, the restoration/management of habitats to improve their condition tends to increase the amount of carbon they actively remove from the atmosphere.

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<sup>9</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

3.2.13 Natural habitats, including soil, will be an important factor in addressing climate change and reducing CO<sub>2</sub> emissions alongside technological and behavioural changes.

3.2.14 The Autonomous and Electric Vehicles Act 2018 provides a framework in which electric vehicles, or 'ultra-low emission vehicles' (ULEVs) can grow. The decarbonisation of both private cars and goods and passenger carrying vehicles is seen as vital to helping the UK achieve its climate change obligations and to improving air quality. To also encourage investors in autonomous vehicles and update insurance protocols regarding events involving autonomous vehicles.

3.2.15 The Future Homes Standard: changes to Part L and Part F of Building Regulations for new dwellings provides proposed options to increase the energy efficiency requirements for new homes in 2020. The Future Homes Standard will require new build homes to be future-proofed with low carbon heating and world-leading levels of energy efficiency which will be introduced by 2025.

3.2.16 For the private rental sector, the Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015 apply and strengthen the domestic minimum standard regulations by removing the existing 'no cost to the landlord' principle for addressing energy efficiency and introducing a 'landlord funding contribution' component where a landlord is unable to obtain suitable 'no cost' funding. To protect landlords from excessive costs in achieving energy efficiency in their properties, the Government is intending to introduce a cost cap: a limit on the amount any landlord would need to invest in an individual property to ensure it is as energy efficient as possible. A cost cap of £2,500 per property is proposed.

### Local

3.2.17 In addition to the Climate Change Act and NPPF, the Environment Strategy for East Sussex (2020) was adopted in March 2020 and seeks to: 'Protect and enhance our natural and built environment for current and future generations and tackle and adapt to climate change. Five priority environmental themes have been identified aligning with international and national policy, these are: climate change, natural capital, air quality, water and resource efficiency. In relation to climate change, actions identified are to:

- Develop a science-based road map for cutting carbon emissions;
- Develop and support a pipeline of projects that deliver a significant reduction in carbon emissions; and
- Develop and implement an electric vehicle strategy for East Sussex.

3.2.18 The Strategy will be driven by the Environment East Sussex Board, a partnership of private, public and educational sector organisations and the Board will steer the implementation of the Strategy. To deliver the actions, partnership working will be required with local authorities, private and public sector bodies.

3.2.19 The Energy Strategy for the South East was produced by three Local Enterprise Partnerships (SELEP, Coast to Capital and Enterprise M3). It provides a

vision for energy provision based around five priority themes with 18 'project models' to support delivery. These are summarised below by theme:

- **Low Carbon Heating:** District Heat Networks rollout ; Off-gas grid home; Hydrogen injection into the Natural Gas grid; and New-build homes on hydrogen grid;
- **Energy Saving and Efficiency:** Off-gas grid homes; Energy Efficiency in homes and SME Support Programme;
- **Renewable Generation:** Offshore wind development; Solar and microgrid on landfill sites; Biomass fuel supply chain development; Solar energy for Network Rail; Car parks - solar potential; and Biofuel evolution;
- **Smart Energy System:** Solar and microgrid on landfill sites; Housing and community microgrids; Electric Vehicle (EV) charging & hydrogen-fuelling infrastructure; Setup of Energy Services Company (ESCo) / Multi-Utility Service Company (MUSCo) infrastructure<sup>10</sup>; Support developments in CO<sub>2</sub> capture; and
- **Transport Revolution:** EV charging & hydrogen-fuelling infrastructure; Compressed Natural Gas (CNG) fleet fuelling and Ports<sup>11</sup> - modernisation of energy infrastructures.

3.2.20 The Council is taking direct action on addressing climate change and declared a climate emergency on 24<sup>th</sup> July 2019, committing to becoming carbon neutral by 2050. As part of this commitment, the Council has produced an evidence-based Climate Emergency Plan<sup>12</sup> that identifies the key actions and intervention measures required to meet the net zero target. The Climate Emergency Plan describes the scale of impact along with a discussion of practicalities and resource implications.

3.2.21 The Climate Emergency Plan provides a detailed breakdown of CO<sub>2</sub> emissions produced within the district, both district-wide emissions and the Council's own emissions. District emissions are based on 2017 figures (the most recent year available) provided by the Department of Business, Energy and Industrial Strategy (BEIS)<sup>13</sup>. They cover all main sectors in the District (e.g. domestic, non-domestic, and transport) by fuel type. Due to methodological changes by BEIS, data on emissions is likely to change moving forward and as it is best practice to use the most up to date statistical releases for emissions data, this will be reflected through the SA and updates to data made as appropriate.

3.2.22 The Climate Emergency Action Plan<sup>14</sup> was agreed by Cabinet on 18<sup>th</sup> December 2019 and highlights a number of priority areas, including reducing energy

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<sup>10</sup> Establishing local energy companies to offer consumers affordable, clean energy can have a number of delivery modes. ESCo's and MUSCo's are alternative models of delivering energy and other services to consumers.

<sup>11</sup> Opportunities exist for vehicle fleet operators to move to CNG as their prime fuel, because it is both lower priced and produces lower CO<sub>2</sub>e emission

<sup>12</sup> Available at <http://council.wealden.gov.uk/documents/s64850/Appendix%20B%20-Wealden%20District%20Council-Climate%20Emergency%20Plan-FINAL.pdf>

<sup>13</sup> BEIS, 'Sub-national total final energy consumption statistics: 2005-2017' (published in 2019). Available at <https://www.gov.uk/government/statistical-data-sets/total-final-energy-consumption-at-regional-and-local-authority-level>

<sup>14</sup> Available at <http://council.wealden.gov.uk/documents/s64848/Cabinet%20Report.pdf>

use in buildings, moving away from the use of fossil fuels to low or zero emission technologies and a transformation in the way the district's population travels.

3.2.23 The Council's Corporate Plan 2019 – 2023<sup>15</sup> will also be key in regards to tackling climate change as it seeks to ensure that growth is achieved sustainably whilst respecting the district's environment. The Plan states that the Council will work with partners for more renewable energy use; make the most of opportunities arising from changes in the energy system to help facilitate cleaner, smarter, more affordable energy for communities; support projects to encourage use of low carbon or renewable energy; facilitate and support initiatives to extend the Electric Vehicle charging network and encourage take-up of ultra-low emission vehicles and reduce pollution waste, use of plastics and promote recycling.

3.2.24 The key terrestrial habitats for carbon storage and sequestration in Sussex are woodland; grasslands; hedges; heathland and wetland. Estimates of the carbon storage capacity of each habitat are provided by Natural England in its research report NERR043<sup>16</sup>.

### **Baseline and trends**

3.2.25 As is happening nationally and globally, Wealden District has experienced and will likely continue to experience significant changes in climate over the coming decades. These climatic changes can be summarised as follows:

- Hotter, drier summers;
- Milder, wetter winters;
- More frequent extreme high temperatures;
- Increases in rainfall and associated increase in fluvial flooding and surface water flooding;
- Increases in sea level rise and increases in storm surge height;
- Decreases in soil moisture content in the summer; and
- Possible higher wind speeds.

### **Energy Consumption**

3.2.26 Figure 4 presents a breakdown of energy consumption in Wealden by sector and fuel type for 2018, as reported by the BEIS<sup>17</sup>. Because the level of information varies for different sectors, in the interest of simplicity and clarity, for the purpose of this report sectors have been grouped as follows<sup>18</sup>:

- Non-domestic: Includes fuel used in the industrial, commercial, public and agricultural sectors, for uses other than transportation;
- Domestic: Domestic sector uses other than transportation;

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<sup>15</sup> <https://www.wealden.gov.uk/wealdens-policies-and-plans/corporate-plan-2019-23/>

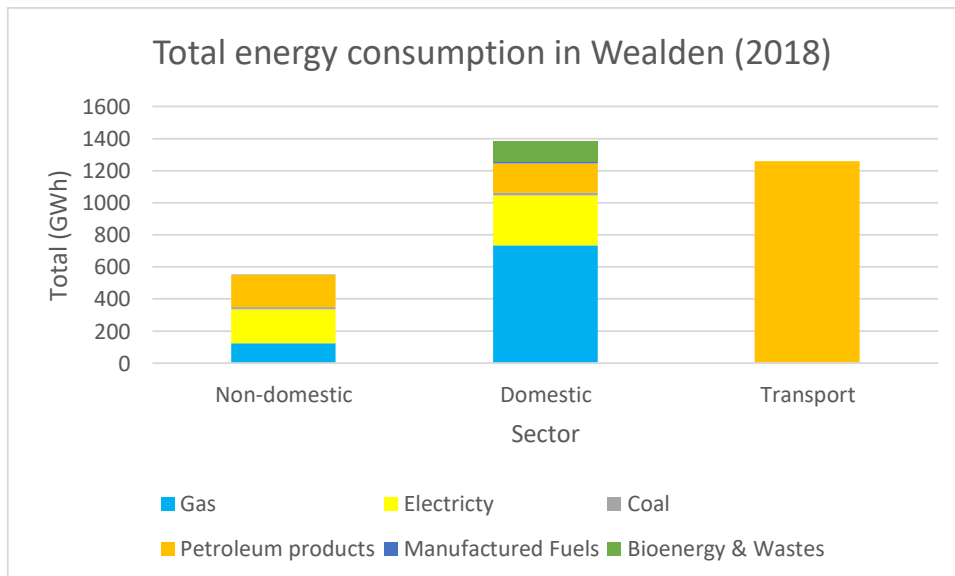
<sup>16</sup> <http://publications.naturalengland.org.uk/publication/1412347>

<sup>17</sup> BEIS, 'Sub-national total final energy consumption statistics: 2005-2018' (published September 2020).

Available at: <https://www.gov.uk/government/statistics/total-final-energy-consumption-at-regional-and-local-authority-level-2005-to-2018>

<sup>18</sup> For further information, see BEIS, 'Sub-national methodology and guidance booklet' (2018). Available at [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/853104/sub-national-methodology-guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/853104/sub-national-methodology-guidance.pdf)

- Transport: Includes both road and rail transportation, although rail represents a very small portion of the total. Electricity used for transport, is not yet represented in the BEIS dataset;
- Bioenergy and energy from waste (referred to as 'Bioenergy & Waste'); and
- 'Petroleum products' includes fuels such as oil, kerosene, and liquefied petroleum gas.



**Figure 4: Wealden District energy consumption by sector and fuel type (2018)<sup>19</sup>**

3.2.27 The domestic sector accounts for the highest proportion of total energy consumption (43.4%), closely followed by the transport sector (39.4%). The non-domestic sector accounts for approximately 17.2% of the total.

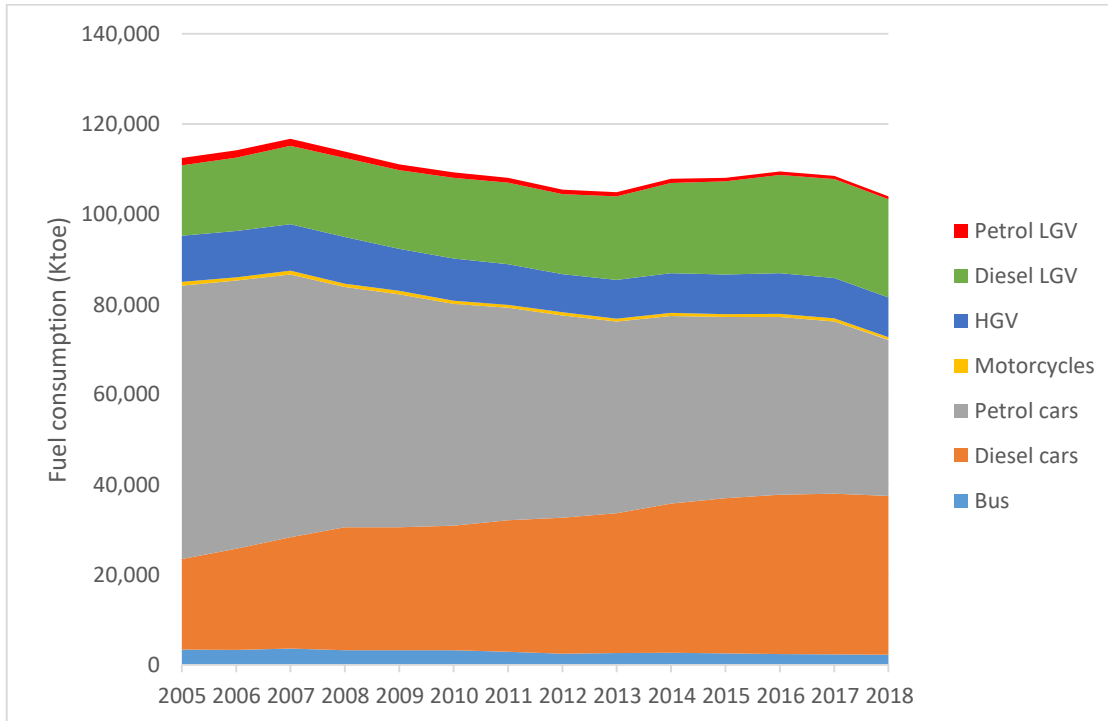
3.2.28 For buildings in the domestic sector, approximately 52.9% of fuel consumed is gas (used for heating and hot water), and 22.6% is electricity. Petroleum products account for around 13.1% of total fuel use in the domestic sector, reflecting the relatively high proportion of buildings that use oil for heating. It is interesting to note that 9.1% of fuel consumed in the domestic sector is from bioenergy and wastes.

3.2.29 In the non-domestic sector, demand for electricity and petroleum products is higher (38.4% and 36.4% respectively), whereas gas consumption makes up around 22.4% of the total for this sector.

3.2.30 Petroleum consumption, which represents 51.4% of total fuel used, is predominately associated with road transport and Figure 5 below shows that petrol and diesel cars account for the majority of this (67.2% in 2018)<sup>20</sup>. In 2018, Light goods vehicles (LGVs) made up around 21.6% of petroleum consumption, and heavy goods vehicles (HGVs) around 8.5%. Buses and motorcycles combined accounted for around 2.8%.

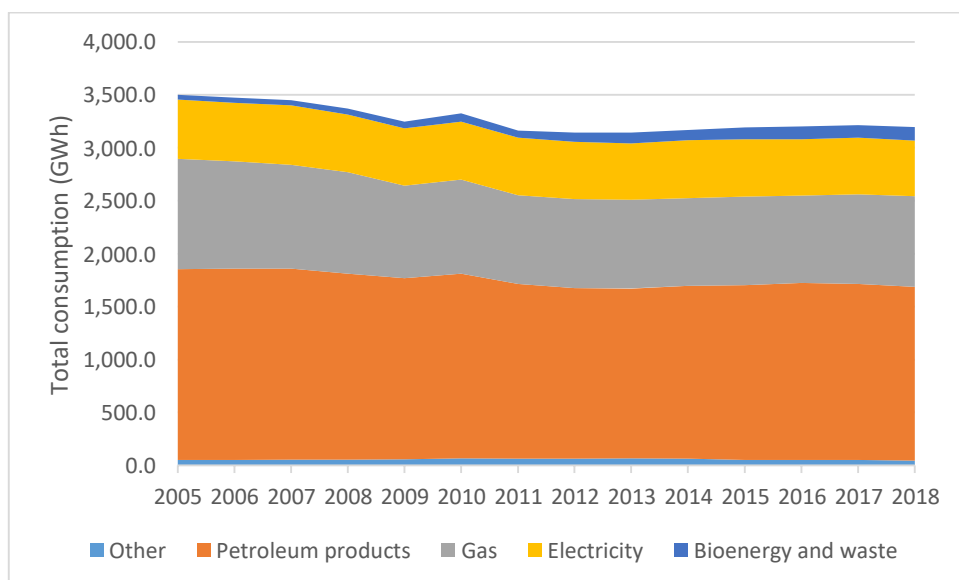
<sup>19</sup> Department for Business, Energy & Industrial Strategy (BEIS). Total energy consumption at regional and local authority level 2005-2018. Available at: <https://www.gov.uk/government/statistics/total-final-energy-consumption-at-regional-and-local-authority-level-2005-to-2018>

<sup>20</sup> Department for Business, Energy & Industrial Strategy (BEIS). Road transport energy consumption at regional and local authority level, 2005-2018. Available at: <https://www.gov.uk/government/statistical-data-sets/road-transport-energy-consumption-at-regional-and-local-authority-level>



**Figure 5: Wealden District fuel consumption by vehicle type<sup>21</sup>**

3.2.31 Fuel use overall has been decreasing since 2005, including petroleum products (-9%); natural gas (-17.7%) and electricity (-6.3%) (See Figure 6). All these factors contribute towards decreasing CO<sub>2</sub> emissions, but the change in electricity consumption has a disproportionately large impact.



**Figure 6: Wealden District changes in fuel consumption<sup>22</sup>**

<sup>21</sup> Department for Business, Energy & Industrial Strategy (BEIS). Road transport energy consumption at regional and local authority level, 2005-2018. Available at: <https://www.gov.uk/government/statistical-data-sets/road-transport-energy-consumption-at-regional-and-local-authority-level>

<sup>22</sup> Department for Business, Energy & Industrial Strategy (BEIS) Total Energy consumption at regional and local authority level 2005-2018. Available at: <https://www.gov.uk/government/statistics/total-final-energy-consumption-at-regional-and-local-authority-level-2005-to-2018>



## Carbon emissions

3.2.32 As a district, CO<sub>2</sub> emissions continue to decrease year on year. Between 2017-2018, emissions in Wealden decreased by 14.9ktCO<sub>2</sub> (2.36%). Total CO<sub>2</sub> emissions in Wealden were 616.1ktCO<sub>2</sub> in 2018.

	Non-domestic (ktCO <sub>2</sub> )	Domestic (ktCO <sub>2</sub> )	Transport (ktCO <sub>2</sub> )	Total (unadjusted) (ktCO <sub>2</sub> )	Percent of total	Land use, Land use change and Forestry (LULUCF) emissions (ktCO <sub>2</sub> )*
Gas	23.2	138.5	-	<b>161.7</b>	<b>21.3%</b>	
Electricity	49.7	73.7	-	<b>123.4</b>	<b>16.3%</b>	
Other	39.9	53.9	-	<b>93.8</b>	<b>12.4%</b>	<b>-141.5</b>
Agriculture	24.1	-	-	<b>24.1</b>	<b>3.2%</b>	
Transport	-	-	354.6	<b>354.6</b>	<b>47.2%</b>	
<b>Total by sector</b>	<b>136.9</b>	<b>266.1</b>	<b>354.6</b>	<b>757.6</b>		<b>616.1</b>
<b>Percent of total</b>	<b>18.1%</b>	<b>35.1%</b>	<b>46.8%</b>	<b>100%</b>		

**Table 3: Wealden District CO<sub>2</sub> emissions (2018 data) by sector<sup>23</sup>**

3.2.33 The transport sector accounts for the highest CO<sub>2</sub> emissions, closely followed by the domestic sector. Within the domestic sector, gas use produces the most emissions reflecting the fact that many homes use gas for heating. Electricity use is also a high emitter of CO<sub>2</sub>.

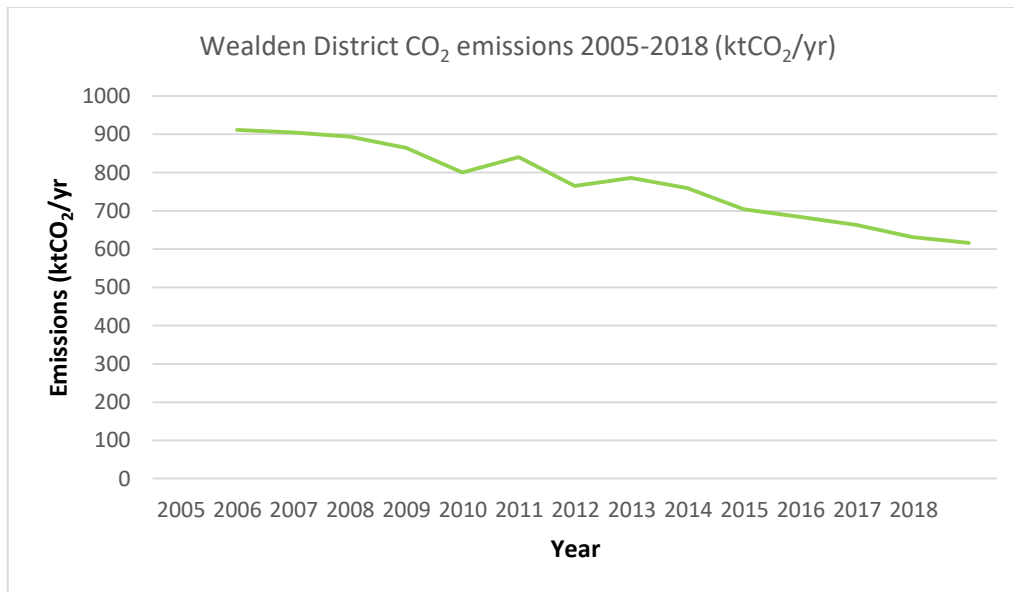
3.2.34 Land Use, Land Use Change and Forestry (LULUCF) activities result in a significant net *removal* of atmospheric CO<sub>2</sub>, and in 2018 this had the effect of reducing total emissions by around 18.7%. This reflects the relatively rural character of the District, which includes large areas of woodland.

3.2.35 In order to place these figures into context, it is helpful to consider historic trends. On average, as shown in Figure 7<sup>24</sup>, total CO<sub>2</sub> emissions have fallen by roughly 32.4% between 2005 and 2018.

<sup>23</sup> BEIS, 'UK local authority and regional carbon dioxide emissions national statistics: 2005-2018' (published in June 2020) Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2018>

<sup>24</sup> Department for Business, Energy and Industrial Strategy (BEIS), June 2020. Local Authority Territorial CO<sub>2</sub> emissions estimates 2005 – 2018 (kt CO<sub>2</sub>) – Full dataset. Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2018>





**Figure 7: Wealden District historic carbon emissions, 2005-2018**

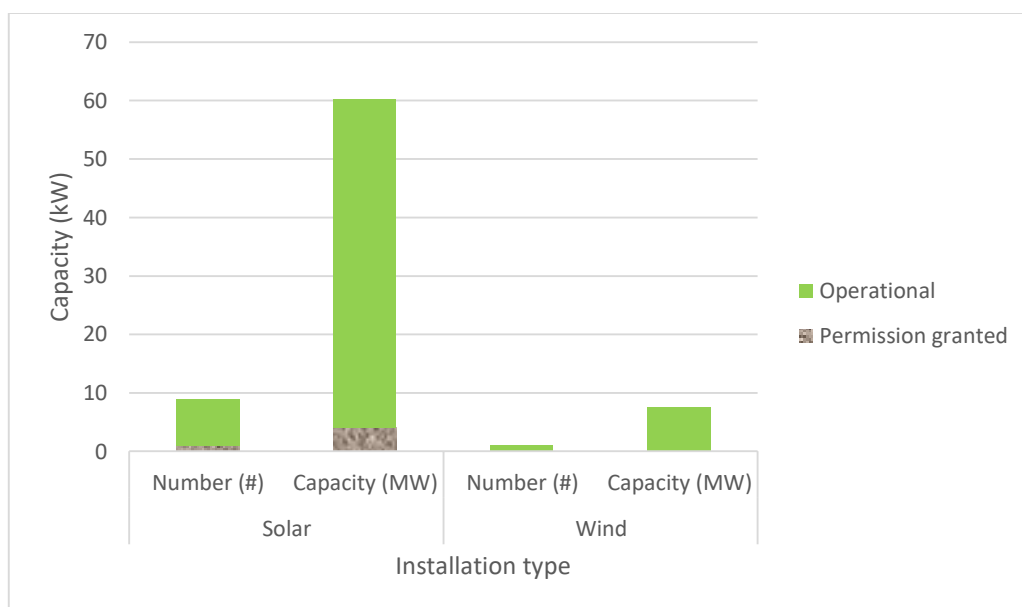
3.2.36 Decreasing fuel consumption accounts for only a little more than half of the CO<sub>2</sub> emissions reductions achieved over this time. The remainder is due to decarbonisation of the national electricity grid.

3.2.37 The use of LULUCF activities such as agriculture and forestry, had the effect of increasing the sequestration of carbon by around 19.15% in the period 2005 - 2018, although it should be noted that there is a higher level of uncertainty associated with these estimates compared with estimates for CO<sub>2</sub> emissions from gas, electricity and petroleum products.

#### Low carbon technologies and Renewable Energy

3.2.38 There are a total of nine large-scale (100+ kW capacity) renewable energy installations in operation within Wealden as of September 2019, including eight solar farms and one onshore wind farm. One solar farm was granted planning permission in 2017 but has not been completed<sup>25</sup>.

<sup>25</sup> BEIS, 'Renewable Energy Planning Database: Quarterly Extract – September 2019' (2019). Available at: <https://www.gov.uk/government/publications/renewable-energy-planning-database-monthly-extract>



**Figure 8: Large scale (100kW+) LZC technologies in Wealden**

3.2.39 It is estimated that there are approximately 400 domestic photovoltaic (PV) installations per 10,000 households in Wealden, based on Feed-in Tariff registrations. The table below shows the total number and type of smaller-scale Low or Zero Carbon (LZC) technology installations across the District.

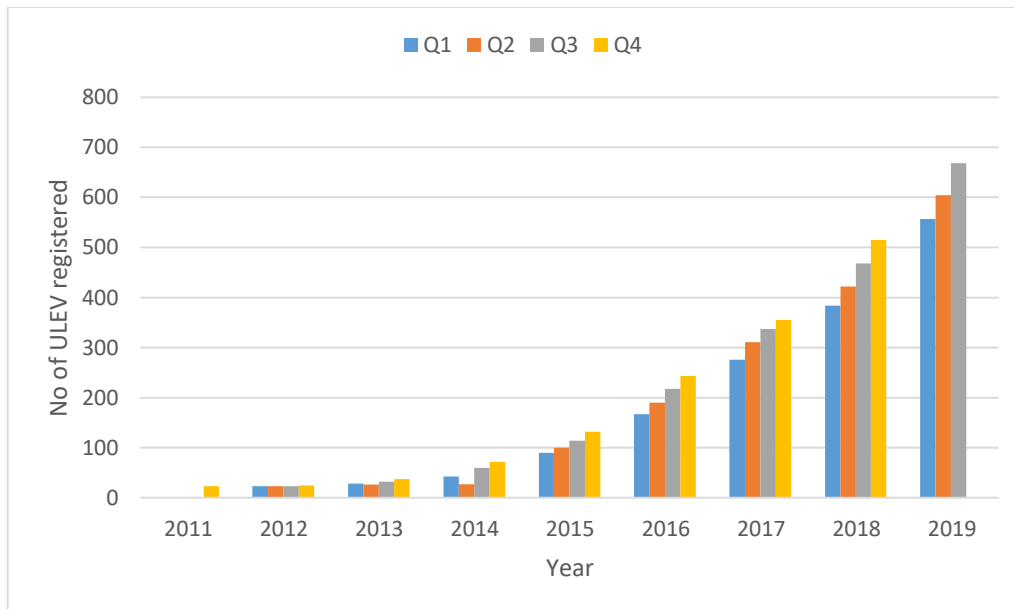
Technology type	Photovoltaics			Wind	Micro CHP
	Domestic	Non-domestic	Total	Total	Total
Cumulative no of installations	2,801	121	2,922	1	1
Cumulative installed capacity	11,524	7,865	19,390	5	1

**Table 4: Small-scale (up to 100kW) LZC technologies in Wealden**

3.2.40 There has been a significant increase in the number of Ultra Low Emission Vehicles (ULEVs)<sup>26</sup> registered in Wealden between 2011 and 2019 – although with only 668 registrations by Q3 of 2019, these represent a small proportion of the nearly 120,000 vehicles registered in the District<sup>27</sup> (see Figure 9).

<sup>26</sup> Defined as 'vehicles that emit less than 75g of carbon dioxide (CO<sub>2</sub>) from the tailpipe for every kilometre travelled. In practice, the term typically refers to battery electric, plug-in hybrid electric and fuel cell electric vehicles.' See Department for Transport, 'VEH0132: Licensed ultra-low emission vehicles by local authority' (2019). Available at <https://www.gov.uk/government/statistical-data-sets/all-vehicles-veh01#licensed-vehicles>

<sup>27</sup> Department for Transport, 'VEH0105: Licensed vehicles by body type and local authority' (2019). Available at: <https://www.gov.uk/government/statistical-data-sets/all-vehicles-veh01#licensed-vehicles>



**Figure 9: Ultra Low Emission Vehicle (ULEV) registrations in Wealden Q4 2011-Q3 2019**

3.2.41 As of 2019, there are a total of 12 EV charging points within Wealden<sup>28</sup>, including two that are located at the Wealden District Council offices in Hailsham.

3.2.42 The Wealden District Council Climate Emergency Plan modelled projected carbon emissions to 2050 taking account of committed and planned national interventions, including national grid decarbonisation and the decarbonisation of heat and transport. The projections consider the relative scale and impact of the following variables:

- New dwellings and additional employment floorspace;
- National grid decarbonisation;
- Energy efficiency measures and behaviour change;
- Switch to direct electric heating (DEH) or heat pumps;
- Switch to zero emission vehicles;
- Carbon offsetting through renewable energy generation; and
- Carbon sequestration.

3.2.43 The above changes are based on major national infrastructure transformations and are therefore subject to political and market forces, which the Climate Emergency Plan acknowledges. The modelled projections therefore test sensitivities associated with these actions to understand the potential range of emission reductions in a 'do-nothing more' baseline scenario. The Climate Emergency Plan highlights key issues, providing additional context and background to inform the actions and recommendations it puts forward.

3.2.44 The baseline data indicates that Wealden is moving in the right direction in terms of reducing CO<sub>2</sub> emissions and embracing low carbon and renewable technologies, including ULEVs. However, many of the changes required to tackle climate change and emissions are reliant on major national interventions, upon

<sup>28</sup> According to maps produced by the Department for Transport <http://maps.dft.gov.uk/ev-charging-map/>

which Wealden has limited influence aside from lobbying government. Notwithstanding this, opportunities do exist to reduce carbon emissions at a local level.

### Carbon sequestration

3.2.45 CO<sub>2</sub> storage in biomass is what makes woodland stand out from other habitat types. However, even in woodland, a significant percentage of the total carbon is in the soils. Previous land use is the most important factor in determining effect of afforestation on net carbon impact, e.g. change from cultivated soil to forest is likely to be carbon positive, but carbon stocks in grassland are already high so there is less opportunity for additional carbon capture on these soils. Young/ newly planted trees take time to ramp up their sequestration rates (10 - 15 years) and carbon rates increase with growth rates, before slowing down as trees reach maturity. Naturally regenerated forests can lock up carbon relatively quickly, but trees only lock up carbon in the long-term if they are kept in the ground (i.e. not clear felled).

3.2.46 Grasslands have high carbon stocks – mostly in the soils. Semi-natural and semi-improved grasslands are important carbon stocks due to their ‘permanence’ and lack of soil disturbance over time. Land use change from grassland to arable land releases a significant amount of carbon to the atmosphere. The reverse is also true (conversion of cropland to permanent grassland increases soil carbon). Factors that negatively affect the carbon stock:

- Destruction (through land use change as above, and loss to development);
- Soil disturbance – in general this releases carbon;
- Intensive management (improvement and over-grazing alter soil properties; and
- Improved grasslands (regularly fertilized and/or ploughed/reseeded) have different soil properties from semi-natural and semi-improved grasslands.

3.2.47 In relation to heathland, wet heath on peaty soils are more significant stores than drier heaths on sandy/mineral soils. Most of the carbon stock associated with heaths is in the soil: carbon concentrations in heathland soils can be greater than in forest soils. Sequestration rates depend on the growth stage of the vegetation. Bare ground stage may be a net source; building and mature stages are net sinks and there is no net sequestration in later stages. Carbon emissions can result from soil disturbance, from damage or even from management and restoration practices which remove or invert soil and therefore minimising disturbance to soil when managing is key.

3.2.48 Carbon storage in hedges/hedgerows is found in above ground biomass; below ground biomass and soil. How hedges are managed is key - increasing the height (to 3.5m) and in particular the width of hedgerows (to 2m) is effective in raising carbon stored in biomass and soil<sup>29</sup>.

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<sup>29</sup> Utilising hedgerows for landscape scale carbon sequestration. Available at: <https://www.agroforestry.ac.uk/sites/www.agroforestry.ac.uk/files/Axe%20Utilising%20hedgerows%20for%20landscape%20scale%20carbon%20sequestration%20final%20v2.pdf>

3.2.49 Carbon sequestration is most significant in wetlands characterized by peat soils and there is much less evidence for other wetland types in UK. Land use change from wetlands to other habitat tends to result in net carbon loss (emission) whereas drainage and disturbance causes changes to carbon cycling, decomposition and fluxes. Damaged wetlands can be restored and this does increase carbon sequestration but does not compensate for the net accumulation of carbon in the original system before disturbance. Thus wetland protection is preferential to restoration in terms of carbon sequestration/storage.

### **Key Sustainability Issues**

3.2.50 The key issues arising from the review of PPPs and baseline information relating to climate change are:

- How to promote and deliver housing and economic growth whilst ensuring that greenhouse gas emissions are reduced;
- The need to ensure that development is designed and delivered in ways that mitigate the effects of climate change but which also allow for adaptation to climate change;
- Mitigating the impacts of climate change as well as adapting to them is an extremely important issue for environmental, social and economic policy areas; and
- Development will need to incorporate sustainable construction, energy efficiency and renewable energy, including reducing CO<sub>2</sub> emissions to achieve zero carbon standards.

### **Likely evolution without the Local Plan**

3.2.51 The likely evolution without the Local Plan is:

- CO<sub>2</sub> emissions continue to decrease in line with national approaches;
- National measures are largely outside of the Council's direct control, relying on shifts in technologies, consumer behaviour and national policy interventions, without the Local Plan there would be a policy gap in relation to the delivery of key measures through growth and change;
- CO<sub>2</sub> emissions from transport will continue to be high given the rural nature of the District although, relative to overall CO<sub>2</sub> emissions from transport, will decline in general as national targets are influential;
- Development of an EV network across the district may stall or will not meet its full potential;
- National approaches are less well placed to take account of local circumstances and less able to take advantage of any local opportunities; and
- District fails to meet its targets set in the Climate Emergency Plan.

### **Possible Local Plan/Policy Approach**

3.2.52 Possible Local Plan/Policy approaches to the key issues are:

- The overall development strategy will need careful consideration in order to assist in reducing emissions i.e. distribution of development;

- Local Plan policies should seek, where possible, nature based solutions for sequestering and storing carbon as well as considering low carbon developments. This should include accounting for the loss of any natural habitats that currently store carbon;
- Any policies should include the actions and priorities of the Council's Climate Action Plan and Strategy as well as having regard to national and international requirements;
- The Local Plan and policies should allow for close integration of the priorities detailed in the Wealden District Council Climate Change Plan and Action Plan, as appropriate;
- Design policies/criteria for development should detail the way development proposals can adapt to the likely effects of climate change as well as help towards mitigating climate change;
- Development should meet the highest standards of energy efficiency, sustainable design and construction, and ensure that buildings are designed to cope with the likely predicted changes in climate;
- Criteria can be established that require low carbon and renewable energy and water efficiency within development proposals;
- The Local Plan and policies should seek a reduction in traffic congestion and encourage sustainable modes of transport in order to reduce pollution i.e. walking; cycling; and public transport;
- Opportunities for standalone renewable energy installations should be investigated and identified where appropriate;
- Criteria must be established for when ULEV infrastructure i.e. charging points, is required within development proposals;
- Policies should be established to support and deliver (as appropriate) the ULEV charging network across the district; and
- Policies should recognise the role green Infrastructure/ natural interventions can deliver in reducing temperatures and enabling climate adaptation.

### **Sustainability Appraisal Objectives**

3.2.53 In order to address these sustainability issues, there should be sustainability appraisal objectives dealing with:

- Reducing carbon emissions;
- Facilitating renewable energy generation and technologies;
- Looking at carbon sinks (sequestration);
- Reduce pollution, improve air quality; and
- Adaptation and mitigation to current and emerging climate risks.

## 3.3 Biodiversity

### Relevant Plans, Policies and Programmes (PPPs)

#### International

3.3.1 At the international level the following PPPs are relevant to biodiversity:

- International Convention on Wetlands (Ramsar Convention) (1976);
- Convention on the Conservation of Migratory Species of Wild Animals (CMS / Bonn Convention) (1979);
- Convention on Biological Diversity (CBD) (1992);
- UN Paris Climate Change Agreement (2016);
- Kyoto Protocol on Climate Change, United Nations, 1997;
- UN Resolution 2015 Transforming our world: The 2030 Agenda for Sustainable Development (Goal 14 'Life below water' and Goal 15 'Life on Land');
- UN Decade on Ecosystem Restoration (2021 – 2030); and
- IPCC special report on the Impacts of Global Warming above 1.5°C.

3.3.2 Collectively, these PPPs seek to protect and enhance wildlife, habitats and biodiversity at the highest level and this includes climate change legislation which will have an overall impact on the natural environment in some form. Much of the aims and objectives of these PPPs have been transposed into lower tier legislation.

#### European

3.3.3 At the European level, the most relevant PPPs relating to biodiversity are:

- **The Habitats Directive (1992/43/EEC)** – adopted in 1992, this Directive ensures the conservation of a wide range of rare, threatened or endemic animal and plant species. Some 200 rare and characteristic habitat types are also targeted for conservation in their own right. It aims to promote the maintenance of biodiversity, taking account of economic, social, cultural and regional requirements. It forms the cornerstone of Europe's nature conservation policy, together with the Birds Directive, and establishes the EU wide Natura 2000 ecological network of protected areas, safeguarded against potentially damaging developments;
- **The Wild Birds Directive (2009/147/EC)** - Europe is home to more than 500 wild bird species but at least 32 % of the EU's bird species are currently not in a good conservation status. The Birds Directive aims to protect all of the 500 wild bird species naturally occurring in the European Union. The Directive places great emphasis on the protection of habitats for endangered and migratory species. It establishes a network of Special Protection Areas (SPAs) including all the most suitable territories for these species. Since 1994, all SPAs are included in the Natura 2000 ecological network;

- **European Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) (1979)** – this Convention is a binding international legal instrument in the field of nature conservation, covering most of the natural heritage of the European continent and extending to some States of Africa. It is the only regional Convention of its kind worldwide, and aims to conserve wild flora and fauna and their natural habitats, as well as to promote European co-operation in this field. The treaty also takes account of the impact that other policies may have on natural heritage and recognises the intrinsic value of wild flora and fauna, which needs to be preserved and passed to future generations.
- **European Floods Directive (2007)** – this Directive aims to reduce and manage the risks that floods pose to human health, the environment, cultural heritage and economic activity and works together with the Water Framework Directive. This Directive requires Member States to assess if all water courses and coast lines are at risk from flooding, to map the flood extent and assets and humans at risk in these areas and to take adequate and coordinated measures to reduce this flood risk.
- **The EU Water Framework Directive 2000/60/EC** – this Directive sets out rules to halt deterioration in the status of European Union (EU) water bodies and achieve ‘good status’ for Europe’s rivers, lakes and groundwater, with a deadline of 2015 for this to be achieved. This deadline has not been achieved and work continues under the Directive. Specifically, the Directive aims to:
  - Protect all forms of water (surface, ground, inland and transitional);
  - Restore the ecosystems in and around these bodies of water;
  - Reduce pollution in water bodies; and
  - Guarantee sustainable water usage by individuals and businesses
- **European Air Quality Framework Directive (1996) and Air Quality Directive (2008)** – this puts in place measures for the avoidance, prevention, and reduction in harmful effects to human health and the environment associated with ambient air pollution and establish legally binding limits for the most common and harmful sources of air pollution.

## National

3.3.4 The Conservation of Species and Habitats Regulations (2017), the “Habitats Regulations”, provide the overarching framework for the protection of habitats and species in the UK and this is fed through into the NPPF. These Regulations were amended by the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018).

3.3.5 The legislation sets out the requirements for determining if a plan or project may affect the protected features of a habitat site before deciding whether to undertake, permit or authorise it.

3.3.6 The Wildlife and Countryside Act 1981 (as amended) gives protection to native species, controls the release of non-native species, enhances the protection



of Sites of Special Scientific Interest and builds upon the rights of way rules in the National Parks and Access to the Countryside Act 1949.

3.3.7 Section 40 of the Natural Environment and Rural Communities Act 2006 places a duty to conserve [biodiversity](#) on public authorities in England. It requires [local authorities](#) and government departments to have regard to the purposes of conserving biodiversity in a manner that is consistent with the exercise of their normal functions such as policy and decision-making. 'Conserving biodiversity' may include enhancing, restoring or protecting a population or a habitat. Section 41 requires the Secretary of State to publish and maintain lists of species and types of habitats which are regarded by [Natural England](#) to be of "[principal importance](#)" for the purposes of conserving biodiversity in England. These 56 priority habitats and 943 species are drawn from earlier lists of [United Kingdom Biodiversity Action Plan](#) Priority Species and Habitats. The Section 41 lists are needed by decision-makers in local and regional authorities when carrying out their duties under Section 40 of the Act.

3.3.8 In 2018, the government published its 25 Year Environment Plan<sup>30</sup> which set out the strategy for managing and enhancing the natural environment, embedding 'net gain' principles as key to environmental considerations. The 'net gain' principle has been incorporated into the NPPF (2019) and is also making its passage through Parliament at the moment as part of the Environment Bill (2020).

3.3.9 The Environment Bill (2020) was published in January 2020<sup>31</sup> and seeks to manage the impact of human activity on the environment, creating a more sustainable and resilient economy, and enhancing well-being and quality of life. The Bill states an intention to maintain and improve environmental designations as the UK leaves the EU. The 'net gain' principle is achieved in the Bill through a requirement for all planning permissions granted to be subject to a condition requiring the submission and approval of a biodiversity gain plan. This plan must demonstrate that the biodiversity value attributable to the development exceeds the pre-development biodiversity value of the onsite habitat by at least 10%. Legislative changes arising from this Bill will be reflected in updates to the Sustainability Appraisal process as the Council progresses with the Local Plan.

3.3.10 Plans to accelerate tree planting and improve the management of England's existing trees and woodlands are underway as the government launched a consultation to inform a new England Tree Strategy on 19<sup>th</sup> June 2020. Subject to consultation, the new strategy will set out policies to expand tree cover, support woodland management and increase public engagement with trees and woodlands. It will help ensure the government's tree planting commitment – to increase tree planting to 30,000 hectares per year across the UK by 2025 - is delivered, working closely with the devolved administrations, communities and landowners to do so. The consultation is due to close on 11<sup>th</sup> September 2020, although in light of the Coronavirus the closing date will be kept under review.

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<sup>30</sup> <https://www.gov.uk/government/publications/25-year-environment-plan>

<sup>31</sup> <https://publications.parliament.uk/pa/bills/cbill/58-01/0009/20009.pdf>

3.3.11 The National Planning Policy Framework (NPPF) makes it clear that the Habitats Regulations must be adhered to in terms of plan making and decision-making but also explicitly set out the requirements development needs to take account of in terms of the natural environment. One of the three overarching objectives of the NPPF is to contribute to protecting and enhancing our natural, built and historic environment including helping to improve biodiversity.

3.3.12 As the whole premise of the NPPF is to achieve sustainable development, this means that the framework inherently seeks to address issues affecting the natural environment as a whole through avoidance and mitigation of harm as well as protection, enhancement, creation and maintenance. Many of the policies it sets out are interrelated in terms of the natural environment and biodiversity, for example those on climate change, green infrastructure and the water environment as well as housing and economic development.

3.3.13 It also presents a balancing act between sustainable growth and development and the impact on the natural environment, which is not an easy matter to resolve. Specifically, in relation to biodiversity, the NPPF (para 170) states that planning policies and decisions should contribute to and enhance the natural and local environment by:

- protecting and enhancing sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- recognising the wider benefits from natural capital and ecosystem services including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; and
- minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

3.3.14 The NPPF also requires that plans distinguish between the hierarchy of international, national and locally designated sites and that any allocations for development are on land with the least environmental or amenity value. Plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

3.3.15 With regards to biodiversity and habitats, the NPPF (para 174) also contains clear requirements that are in addition to those of the Habitats Regulations. In order to protect and enhance biodiversity and geodiversity, plans should:

- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks – including sites designated for their biodiversity importance. Plans should also identify, map and safeguard wildlife corridors and stepping stones that connect them; areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and

- b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

3.3.16 Whilst the NPPF has as its central thread the presumption in favour of sustainable development, para 177 makes it explicit that this does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site. This is where the Habitats Regulations and the higher tier European Directives come into play.

3.3.17 Ancient Woodland is also a valuable habitat and biodiversity resource. Natural England undertakes an Ancient Woodland Inventory, the latest being updated on 20<sup>th</sup> May 2020.

3.3.18 The UK Biodiversity Action Plan (BAP)<sup>32</sup> identifies priority species and habitats requiring conservation action. The UK BAP has been superseded by the national biodiversity strategy for England, Wales and Scotland 'Biodiversity 2020: A Strategy for England's Wildlife'<sup>33</sup>, however, BAP priority species and habitats have been used to draw up statutory lists of priority species and habitats in England.

### Local

3.3.19 The Environment Strategy for East Sussex (2020) seeks to: *'Protect and enhance our natural and built environment for current and future generations*. Five priority environmental themes have been identified aligning with international and national policy, these are: climate change, natural capital, air quality, water and resource efficiency. It identifies natural capital as *"the stock of renewable and non-renewable resources (e.g. plants, animals, air, water, soil) that yield a flow of benefits to people, including food, fuel, clean water, climate regulation, pollination of crops by insects and flood defence"* (page 8). An action is identified to develop a Natural Capital Investment Plan.

3.3.20 The Natural Capital Investment Plan identified in the Environment Strategy for East Sussex (2020) was published by the Sussex Local Nature Partnership (SLNP) in December 2019. The strategy seeks to guide the SLNP approach to directing investment in nature, across the terrestrial, coastal and marine environments, for the next 5 year period and beyond. The Strategy provides an initial strategic assessment of how best to focus effort, resources and funds to protect and enhance the stock of natural capital assets for the benefit of nature and people. It also identifies opportunities to use a natural capital approach to deliver specific outputs as well as guidance on the steps needed to take this broad spatial strategy forward into action and outcomes on the ground.

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<sup>32</sup> <https://jncc.gov.uk/our-work/uk-bap/>

<sup>33</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69446/pb13583-biodiversity-strategy-2020-111111.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69446/pb13583-biodiversity-strategy-2020-111111.pdf)

3.3.21 The purpose of the Sussex Local Nature Partnership is to work across sectors and organisations to secure the healthiest ecological system possible thereby protecting and enhancing the natural environment and all that it provides. This vision is the key guiding principle behind the work of the LNP, both in terms of its direct delivery and in terms of any advice it may give, the statements it makes and the positions it may hold.

3.3.22 Part of the plan to invest in and protect nature locally in Sussex is to develop and deliver Nature Recovery Networks (NRNs) together with Local Nature Recovery Strategies (LNRSs). An NRN could be made up of hundreds or thousands of wild places across Sussex, with wildlife corridors and stepping stones to connect them all up. Where these don't already exist, the NRN and LNRS can identify opportunities for their creation. Sussex LNP is working on developing NRNs for Sussex and public bodies will need to report on the implementation of LNRSs. These public bodies are to be appointed by the Secretary of State but will require reporting from District and Borough Councils. The mechanism for collecting and reporting on this data is yet to be established but the Sussex LNP can help with this.

3.3.23 The Sussex Biodiversity Records Centre provides environmental information services encompassing biodiversity, geodiversity and other aspects of Sussex's natural capital. The Centre is focussed on improving evidence and ensuring it is accessible to inform planning, decision making and nature conservation. They provide a single shared evidence base to support the collaboration and effectiveness of local authorities and other public bodies policies and plans. Information for plan making includes:

- Protected, priority and invasive species;
- Priority habitats;
- International, national and locally designated sites of importance for biodiversity and geodiversity;
- Landscape-scale natural areas;
- Green infrastructure and greenspace information; and
- Ecosystems services and ecological networks mapping

3.3.24 The Sussex Biodiversity Partnership was comprised of representatives from a range of organisations including local government. Their aim was to conserve and enhance the biological diversity of Sussex, contributing to international biodiversity objectives and enhancing quality of life in the county. They developed a Sussex Biodiversity Action Plan (2010) with delivery focussed on Biodiversity Opportunity Areas (BOAs). The BOAs were set up to represent the targeted landscape-scale approach to conserving biodiversity in Sussex.

3.3.25 The water environment is also important in terms of biodiversity. Water, People, Places: A Guide for master planning sustainable drainage into developments was prepared by the Lead Local Flood Authorities of the South East of England. It confirms that the inclusion of plants, trees, and other vegetation is often advantageous to slow and store water while providing filtration. These can be designed to support local biodiversity aims.

3.3.26 SuDS treatment trains can be used to develop ecological corridors at the same time. They can also incorporate a range of vegetation species, ranging from wetland plantings to more common garden varieties. SuDS should be designed to complement and improve the ecology of the area, however consideration should be given to the effects of both species selection and maintenance requirements on the ability of existing habitats to continue functioning effectively. The guidance sets out the different SuDS measures that can be used and the context they can be used in as well as a matrix to help in the selection of SuDS for the benefits they bring.

3.3.27 The District's Green Infrastructure Study (2017) provides a comprehensive assessment of the district's green infrastructure assets including their current condition and identifies opportunities for their enhancement and protection. It recommends a series of green infrastructure principles and standards to help achieve this in policy terms. The green infrastructure evidence base is likely to be updated as part of work on the new Local Plan

3.3.28 Green infrastructure (GI) and the way it functions is important for biodiversity as it contributes to ecosystem services. Ecosystem services are defined as the benefits provided by the natural environments assets that contribute to making life possible (e.g. clean air, water, food and materials etc.) GI functions are the roles that assets can play if planned, designed and managed in a way that is sensitive to, and includes provision for, natural features and ecosystem services. They may have obvious primary functions, but each asset can perform different functions simultaneously – a concept known as multi-functionality.

### **Baseline and trends**

3.3.29 Wealden has a high quality natural environment, reflected in designation of the Ashdown Forest Special Area of Conservation (SAC) and Special Protection Area (SPA) and the Pevensy Levels SAC and Ramsar site.

### **Internationally designated sites**

3.3.30 Large parts of Ashdown Forest (2,729 hectares) are designated as a Special Area of Conservation (SAC). The SAC status was awarded because Ashdown Forest contains one of the largest single continuous blocks of lowland heath in south-east England. The SAC designation recognises the special nature of the vegetation found within Ashdown Forest, namely European dry heaths and North Atlantic wet heath and affords it legal protection by the Conservation of Habitats and Species Regulations 2017 (as amended).

3.3.31 The main threat to the SAC relates to air pollution and the Council has commissioned a number of reports<sup>34</sup> that investigate the impact of increases in air pollution on the SAC habitat. As part of the development of the new Local Plan, these evidence bases will be updated. Natural England considers Ashdown Forest SAC to be in unfavourable recovering condition.

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<sup>34</sup> <https://www.wealden.gov.uk/planning-and-building-control/planning-policy/planning-policy-evidence-base/habitat-regulations-assessment/>

3.3.32 Ashdown Forest is also a designated Special Protection Area as it supports breeding populations of the Dartford warbler and the nightjar. Together with the nearby Wealden Heaths SPA and Thames Basin Heaths SPA, Ashdown Forest forms part of a complex of heathlands in southern England that support these breeding bird populations of European importance. The Ashdown Forest SPA is of strategic importance to the Council as it lies wholly within the district and recreational pressure from development risks disturbing the birds.

3.3.33 Therefore, current measures are being put in place through the Councils Strategic Access Management and Monitoring (SAMM) Strategy to address recreational pressure. This is being delivered in partnership with the Conservators of Ashdown Forest and neighbouring local authorities<sup>35</sup>. The funding for the strategy and its projects comes from developer contributions.

3.3.34 The Pevensey Levels also benefits from two designations – it is an SAC and a Ramsar site<sup>36</sup>. The SAC status was awarded for the presence of the little whirlpool Ramshorn snail, which can be found here in both a wide spatial distribution and in good population densities. The Ramsar designation was awarded as the Pevensey Levels supports an outstanding assemblage of wetland plants and invertebrates, as well as supporting 68% of aquatic vascular plant species in Great Britain. It is probably the best site in Britain for freshwater molluscs, one of the five best sites for aquatic beetles and supports an outstanding assemblage of dragonflies. Threats to the designation are related to impacts on the water quality, water level management and hydrological regime of the site and its surrounding catchment. Overall, Natural England considers Pevensey Levels SAC and Ramsar site to be in unfavourable recovering condition.

#### Nationally designated sites

3.3.35 There are 32 Sites of Special Scientific Interest (SSSI) in the district including the Ashdown Forest and Pevensey Levels. These SSSIs are shown on Figure 10<sup>37</sup> along with their condition as recorded by Natural England. Information on Natural England (2018) designated sites are also available on the Designated Site View – Natural England<sup>38</sup>.

3.3.36 Wealden District Council has baseline information on the condition of its SSSIs and this will be used to track the change in the condition of the following categories of SSSI: favourable, unfavourable recovering, unfavourable no change, unfavourable declining and no change.

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<sup>35</sup> The local authorities that are partners in the project are Mid Sussex District Council, Sevenoaks District Council, Lewes District Council, Tunbridge Wells Borough Council and Tandridge District Council.

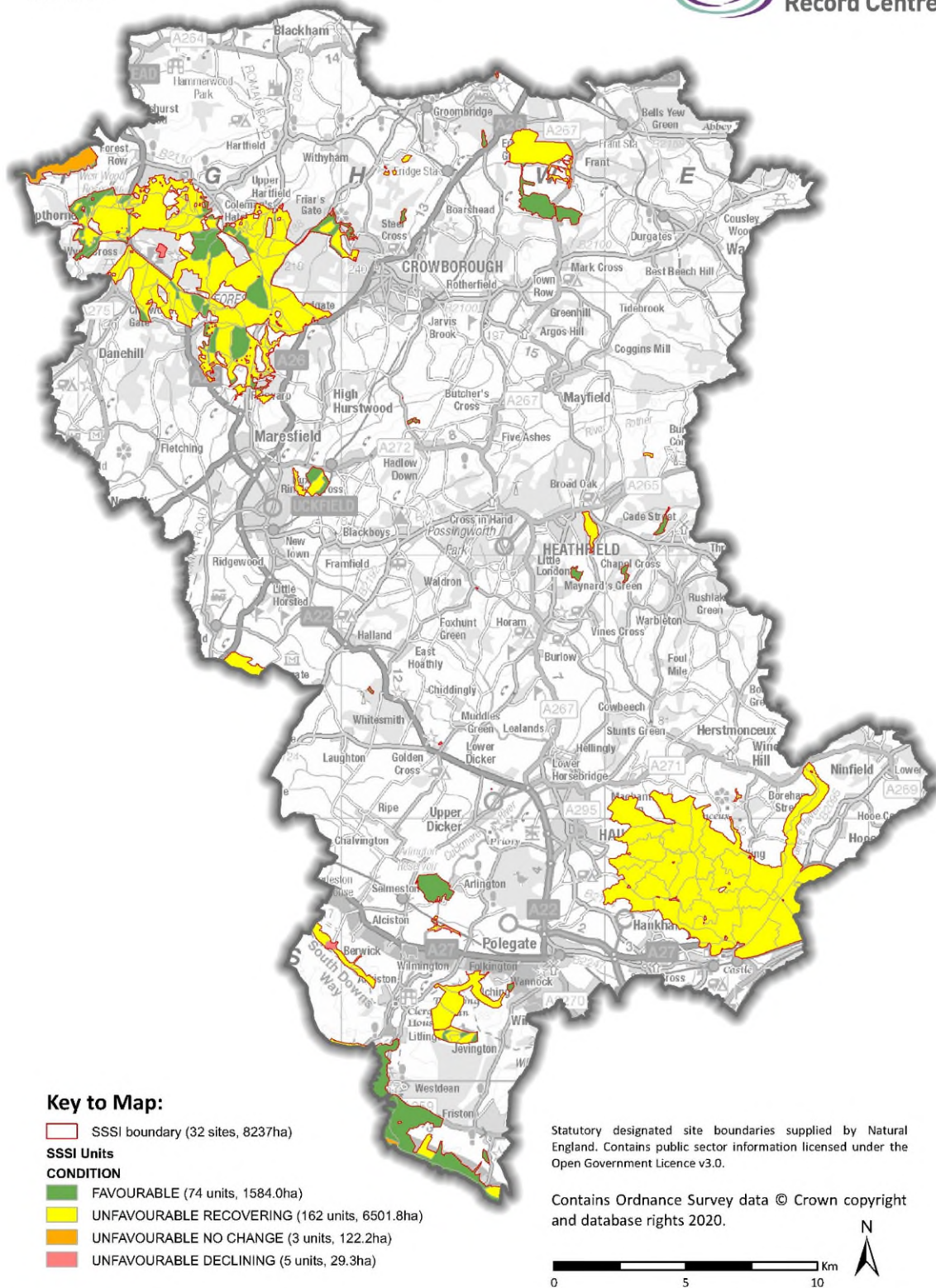
<sup>36</sup> Designated under the International Convention on Wetlands (Ramsar Convention) (1976)

<sup>37</sup> Provided by Sussex Biodiversity Records Centre on 6<sup>th</sup> May 2020.

<sup>38</sup> <https://designatedsites.naturalengland.org.uk/SiteSearch.aspx>



**SSSI unit condition in Wealden District.**  
05/05/2020



**Figure 10 SSSI Unit Condition in Wealden 2020**

3.3.37 There are 2 National Nature Reserves (NNRs) in Wealden – Lullington Heath and Pevensey Levels. The Pevensey Levels NNR covers 4,300ha and Lullington Heath covers 62.67ha.

3.3.38 There are many woodland parcels of designated Ancient Woodland in Wealden (see Figure 11 for location). Wealden has one of the greatest concentrations of ancient woodland in the country, with around 3% of England's ancient woodlands found in this District. Woodland is therefore an integral part of the landscape characteristic of the area. Woodlands also contribute to the ecological, recreational and economic value of the District. Approximately two thirds of Wealden's woodlands are currently classified as ancient. Many of these woodlands (6%) are less than two hectares in size, often surrounding ancient disused historic features such as marl and iron pits, occupying narrow linear features such as gills, or surviving as field boundary shaws.

#### Locally designated sites

3.3.39 Wealden District has 101 Local Wildlife Site (LWS) designations and these are shown on Figure 12. These sites represent local character and distinctiveness but also have an important role to play in meeting local and national targets for biodiversity conservation. The sites can also help to provide linked corridors along which species can migrate and colonise to help biodiversity adapt to long-term changes such as those resulting from climate change. The district also has 26 Local Nature Reserves (LNRs) including West Park LNR and Hempstead Meadows LNR in Uckfield. LNRs are designated by the Local Authority and it is important to protect existing well established habitats as a mature tree/hedge provides far more benefit in terms of wildlife resource and carbon capture than dozens of newly planted whips.

3.3.40 Biodiversity Opportunity Areas were defined in a project lead by the South East Biodiversity Forum in 2008. They present the best opportunity for enhancing biodiversity in a local area, often being buffers around existing reserves or linkages between existing sites. Sites in Wealden are identified on Figure 13 and include:

- The Cuckmere Ouse Watershed;
- The Cuckoo Trail Habitat Link;
- Eridge and Broadwater;
- The Heathfield Habitat Link;
- Lower Cuckmere Reaches;
- Medway, Ouse, Rother Watershed;
- Pevensey Levels;
- Pevensey & Cuckmere Valley Link;
- Pevensey, Rother, Cuckmere Watershed;
- River Cuckmere Habitat Link;
- River Uck and its Headwaters;
- Western Ouse Streams and Ashdown Forest;
- Wilmington Woodlands and Watershed; and
- Wotton Manor Grasslands Link



# Ancient Woodland in Wealden District.

21/05/2020

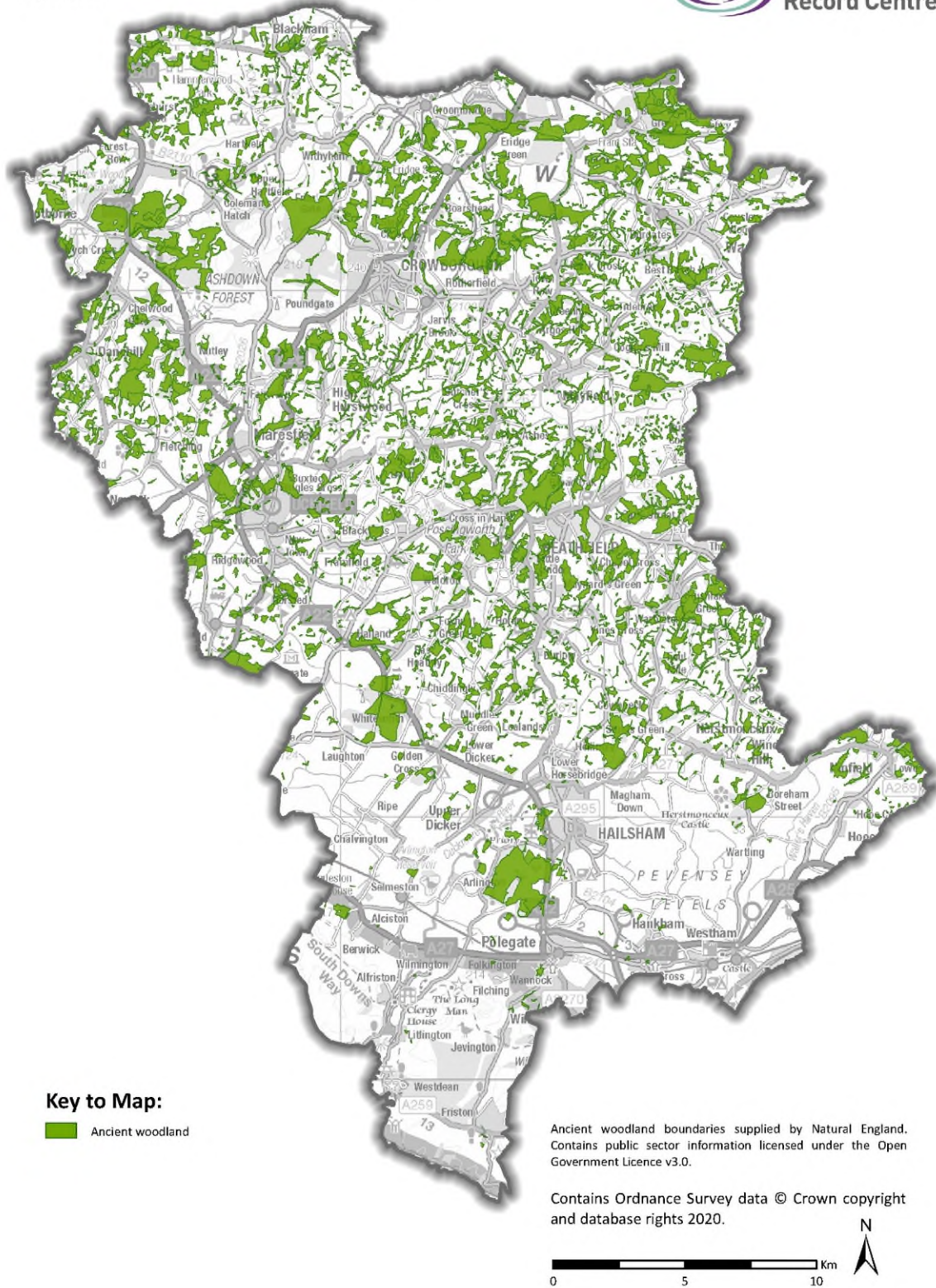
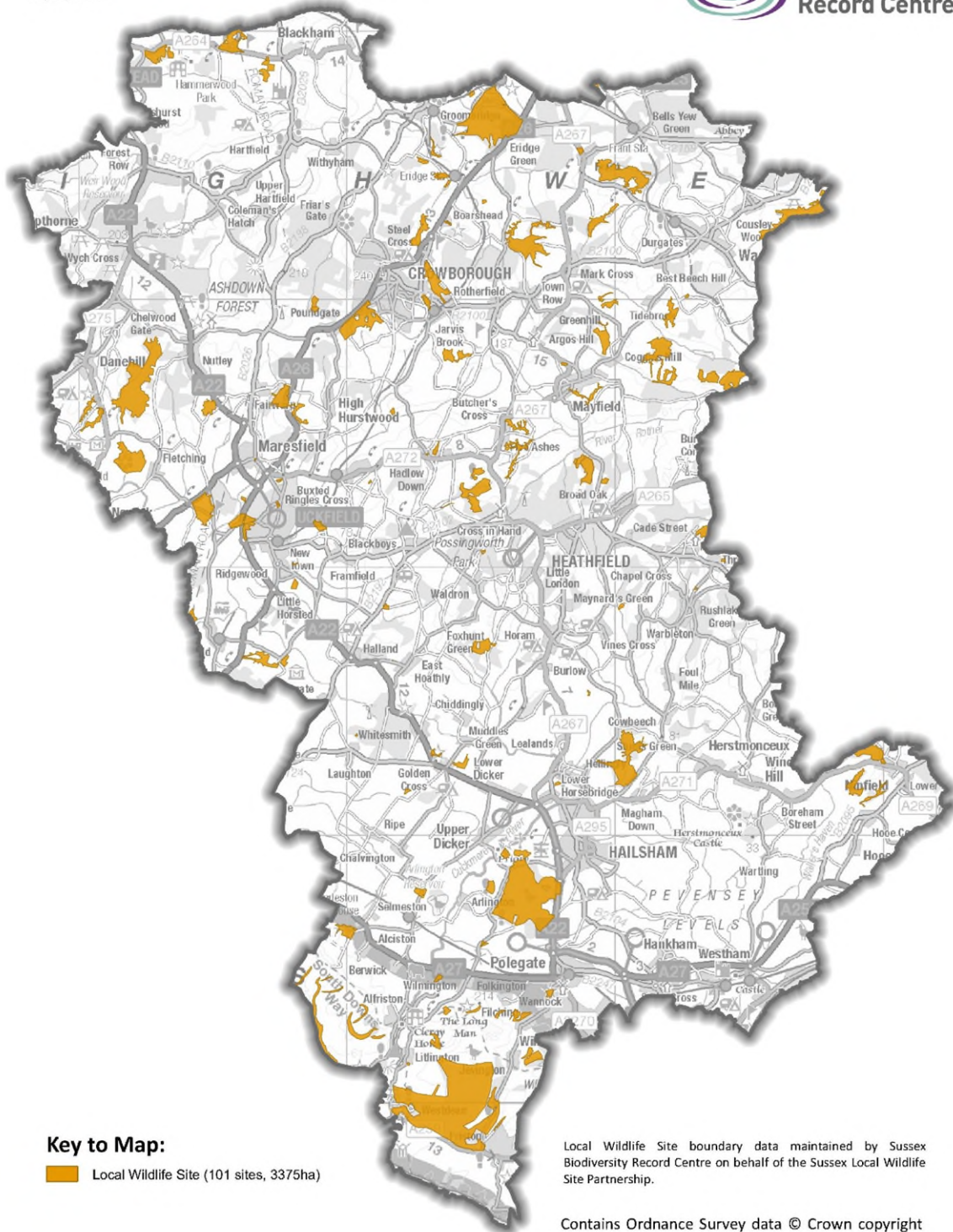


Figure 11: Wealden’s Ancient Woodland

**Local Wildlife Sites in Wealden District.**  
05/05/2020



**Figure 12 Local Wildlife Sites in Wealden 2020**



# Biodiversity Opportunity Areas in Wealden District.

21/05/2020

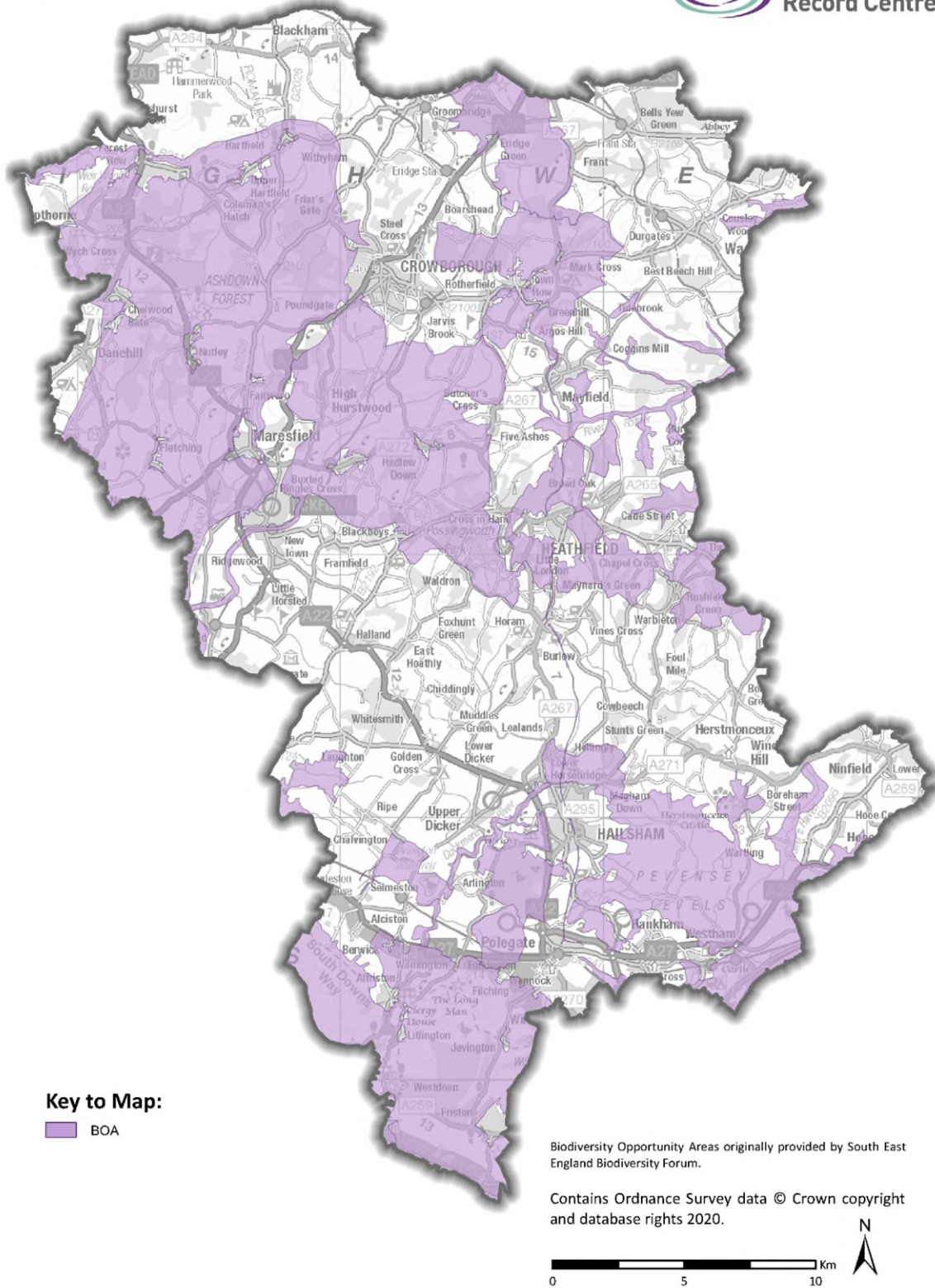


Figure 13: Wealden’s Biodiversity Opportunity Areas (BOAs)

## **Key Sustainability Issues**

3.3.41 The key issues arising from the review of PPPs and baseline information relating to biodiversity are:

- Development has the potential to negatively impact biodiversity and environmental designations e.g. Ashdown Forest SAC and SPA; Pevensy Levels SAC and Ramsar site; SSSIs and NNRs; and Local Wildlife Sites;
- Development needs to achieve net gains in biodiversity for the district as a whole and also in cross boundary scenarios, as appropriate;
- It will be necessary for mechanisms to be in place within the Council to ensure the effective use of the biodiversity net gain metric when this comes into force. This will be required at all levels from assessment of the suitability of the data and interpretation of the metric through to clear delivery and enforcement;
- Other valued habitats and species also need to be considered and where appropriate protected to contribute to climate change mitigation and adaptation;;
- Development can lead to the introduction of non-native invasive species to the district, which can damage the environment and biodiversity;
- Increasing public access to sensitive habitats, can lead to potentially negative effects;
- Development around environmental assets (woodland, nature reserve, fields, local wildlife sites etc.) can increase its isolation resulting in a greater degree of fragmentation; and
- Biodiversity doesn't stop at the local authority boundary, therefore it is important to consider cross boundary impacts.

## **Likely evolution without the Local Plan**

3.3.42 The likely evolution without the Local Plan is:

- Potential deterioration of sites that are designated for their environmental importance as a result of speculative development;
- Failure to achieve the most appropriate biodiversity net gain for the district;
- Potential fragmentation of habitats and wildlife corridors from development; and
- Lack of protection to those sites that do not benefit from national or international designation and protection.

## **Possible Local Plan/Policy Approach**

3.3.43 The possible Local Plan/Policy approaches to the key issues are:

- The Local Plan and policies should ensure that they provide sufficient protection to biodiversity as well as offering enhancement and creation of valued habitats where possible;
- The Local Plan and policies should ensure that they follow the mitigation hierarchy when looking to avoid impacts on biodiversity;

- The Local Plan and policies should ensure that any development around or close to designated sites do not threaten their biodiversity value or lead to a degradation and fragmentation of valued habitats. This is also applicable to non-designated sites that form part of the green infrastructure network;
- It will be important to provide policies to deliver the recommendations relating to the green infrastructure evidence base;
- The location and impacts of development on sensitive biodiversity sites will need to be considered and mitigation identified, as necessary, as set out in the NPPF paras 170-177;
- The Local Plan should seek to protect, retain, enhance and improve biodiversity across the district;
- Embed the requirement for 'net gain' within the Local Plan and policies. Potential for guidance to be produced;
- Establish criteria that set out the means for determining the impact development proposals will have on biodiversity and how to calculate a net gain. Consideration will need to be given to what a net gain in biodiversity is to look like, using the Defra metric tool and approach but tailored to the local context;
- Policies and site allocations should make provision for net gains in biodiversity to be delivered on-site wherever possible;
- It will be important to recognise that strategic solutions may be required for the delivery of net gain that is not deliverable on site. This strategic approach could be established through development of a specific element of the GI strategy or in conjunction with work being developed by the SXLNP, in terms of investment areas;
- The Local Plan will need to ensure there is a mechanism for monitoring the delivery of on-site and off-site biodiversity net gain;
- Local Plan policies will need to take into account any targets set within a LNRS; and
- Potential for SuDS to enhance biodiversity.

### **Sustainability Appraisal Objectives**

3.3.44 In order to address these sustainability issues, there should be sustainability appraisal objectives dealing with:

- Protecting and enhancing biodiversity, habitats and green spaces;
- Achieving net gains for biodiversity;
- Looking at carbon sinks (sequestration); and
- Reduce pollution, improve air quality

## 3.4 Landscape

### Relevant Plans, Policies and Programmes (PPPs)

#### International

3.4.1 At the international level, there are no specific PPPs relating to the matter of landscape. However, many of the PPPs addressing wildlife, habitats, climate change and sustainable development have an indirect relevance to landscape as landscape by its nature incorporates many of these elements. Please refer to the PPPs listed in sub-chapter 3.3 above.

#### European

3.4.2 At the European level the following PPPs are relevant to landscape:

- **European Landscape Convention (2002):** Promotes landscape protection, management and planning. The Convention is aimed at the protection, management and planning of all landscapes and raising awareness of the value of a living landscape.

3.4.3 In the same vein as the international level, there are several European PPPs that have an indirect relevance to landscape, as they address matters relating to habitat and wildlife. Please refer to the PPPs listed in sub-chapter 3.3 above.

#### National

3.4.4 The government's 25 Year Environment Plan (2018) identifies six key areas around which action will be focused including 'recovering nature and enhancing the beauty of landscapes'. In order to achieve this it sets out key actions which include working with authorities with designated "Area of Outstanding Natural Beauty" to deliver environmental enhancements and identifying opportunities for environmental enhancement of all England's Natural Character Areas, and monitoring indicators of landscape character and quality.

3.4.5 In terms of landscape character, National Character Area (NCA) Profiles are published by Natural England and divide England in 159 distinct natural areas based on their landscape, biodiversity, geodiversity, historic, cultural and economic characteristics. NCAs follow natural features in the landscape and are not aligned with administrative boundaries. NCA profiles describe the features which shape each of these landscapes, providing a broad context to its character.

3.4.6 There are 3 NCAs covering Wealden:

- The High Weald National Character Area extends across the northern part of the District;
- The Low Weald National Character Area extends through the middle part of the District; and
- The Pevensey Levels National Character Area extends into the south-eastern part of the District.

3.4.7 The South Downs National Character Area also extends into the southern part of the District.

3.4.8 The High Weald NCA encompasses the ridged and faulted sandstone core of the Kent and Sussex Weald. It is an area of ancient countryside and one of the best surviving medieval landscapes in northern Europe. The High Weald consists of a mixture of fields, small woodlands and farmsteads connected by historic route ways, tracks and paths. Wildflower meadows are now rare but prominent medieval patterns of small pasture fields enclosed by thick hedgerows and shaws (narrow woodlands) remain fundamental to the character of the landscape. The High Weald is a classic patchwork countryside which has remained essentially the same since medieval times. Most but not all of the High Weald NCA is included within the High Weald Area of Outstanding Natural Beauty (AONB).

3.4.9 The Low Weald NCA is a broad, low-lying clay vale which largely wraps around the northern, western and southern edges of the High Weald. It is predominantly agricultural, supporting mainly pastoral farming owing to heavy clay soils, with horticulture and some arable on lighter soils in the east, and has many densely wooded areas with a high proportion of ancient woodland. The Low Weald is identified in the NCA as of outstanding priority for woodland conservation.

3.4.10 The Pevensy Levels NCA is a wetland of national and international conservation importance and 37 per cent of the National Character Area (NCA) is a Site of Special Scientific Interest and Ramsar site. The Levels are predominantly rural and mostly grazed pasture, and consist of extensive drainage networks and flood plain. The NCA also includes the urban centre of Eastbourne which is a busy seaside town. A coastline of shingle beach stretches along the length of the area, punctuated by settlements, historic military buildings and sea defence structures. The area is framed by the steep scarp of the South Downs in the west and the higher ground of the High Weald in the north, with views of the English Channel to the south.

3.4.11 The National Planning Policy Framework (2019) expects local plans to enhance the natural landscape through highlighting a number of measures/ actions. These are extracted below:

- Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty [...]. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited;
- Strategic policies should set out an overall strategy making provision for conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure;
- Planning policies and decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation of change (such as increased densities);

- Planning policies and decisions should contribute to and enhance the natural and local environment by:
  - protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils;
  - recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; and
  - remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

### Local

3.4.12 The High Weald AONB covers 53% of the north of the district. The High Weald AONB Management Plan 2019-2024 (adopted 2019) is a statutory document. The Countryside and Rights of Way Act 2000 requires local authorities with land in an AONB to prepare and publish an up-to-date local plan which ‘formulates their policy for the management of the area and for the carrying out of their functions in relation to it’. Pages 28-61 of the Management Plan outline objectives for the purpose of conserving and enhancing natural beauty, and account for the needs of agriculture, forestry and other rural industries, and of the economic and social needs of local communities. It outlines that particular regard should be paid to promoting sustainable forms of social and economic development.

3.4.13 The East Sussex Landscape Character Assessment (2016)<sup>39</sup> provides an up to date assessment of all the Landscape Character Areas within the County. The Assessment is set within the context of the National Character Areas and breaks these down in County Landscape Character Areas.

3.4.14 It reviews each landscape character area in the context of the social and economic benefits (ecosystem services) that the landscape provides; identifies specific pressures for development and change for each area; describes the key ecosystem services for each character area and evaluates their current landscape condition; outlines suggestions for how the key services can be enhanced and sets out Landscape Management Guidance and suggestions for Managing Change into the future for each character area.

3.4.15 In 2014, Wealden District Council published the Wealden Landscape and Settlement Character Assessment<sup>40</sup>. The main purpose of the studies was to contribute to the Councils planning policy evidence base and help underpin decisions on how best development could be accommodated, having regard to the landscapes within the District, for the study period. The studies assess the landscape in the three distinct NCAs of the District; the High Weald, Low Weald and Pevensey Levels as well as at the more local scale of specific settlements.

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<sup>39</sup> <https://www.eastsussex.gov.uk/environment/landscape>

<sup>40</sup> <https://www.wealden.gov.uk/planning-and-building-control/planning-policy/planning-policy-evidence-base/landscape/>



3.4.16 The Council has also undertaken landscape assessment work for specific sites within some of the district's settlements. This was combined with work on their ecological status also. The studies can be found on the Council's website<sup>41</sup>.

3.4.17 In addition to the landscape studies already discussed, the Council's Green Infrastructure Study (2017) is also relevant to the issue of landscape as it provides an assessment of the green infrastructure assets within the district, their current condition and identifies needs and opportunities. These assets contribute towards the character and condition of the districts landscape and some of the studies recommendations could be taken forward in landscape terms. The Study is very based around the Landscape Institutes Green Infrastructure Position Statement (2013)<sup>42</sup> which notes that:

*'GI assets range from country parks, lakes and woodlands to urban interventions such as green roofs and street trees. They can be specific sites at the local level or broader environmental features at the landscape scale within and between rural and urban areas such as wetlands, moors and mountain ranges'*

*'A GI approach enables landscapes to deliver social, economic and environmental benefits simultaneously and then looks at how those benefits can be multiplied by being connected to a wider network of spaces'*

3.4.18 For example, the network of footpaths and cycle ways often coincide with green corridors and spaces, providing opportunities for people to gain health and well-being benefits from active recreation while experiencing nature and the landscape.

3.4.19 As discussed in Chapter 3.2, the natural environment and habitats help in the sequestration of carbon. Many components that can sequester carbon form part of the landscape of the district i.e. trees, woodlands, grasslands, soil, hedgerows etc. Therefore protecting and enhancing the districts landscape can assist in sequestering carbon and helping to mitigate climate change impacts.

### **Baseline and Trends**

3.4.20 The High Weald AONB covers 53%, or 44,626ha, of the north of the district, recognising the national importance of this landscape. There have been no revisions to this designated area in recent years. The High Weald AONB Management Plan 2019-2024 sets out the framework for its protection and enhancement, which the Council must take into account in any decisions it makes on land within the AONB. The Council will monitor the extent of the AONB area and ensure that negative impacts within it are minimised, if not avoided.

3.4.21 In the south, the South Downs National Park covers around 7% (6,088ha) of the districts area. The South Downs National Park Authority is the authority responsible for planning for their area. The southern areas of the district not within

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<sup>41</sup> <https://www.wealden.gov.uk/planning-and-building-control/planning-policy/planning-policy-evidence-base/landscape/>

<sup>42</sup> <https://landscapewpstorage01.blob.core.windows.net/www-landscapeinstitute-org/2016/03/GreenInfrastructureLIPositionStatement2013.pdf>

the National Park are classed as being within the Low Weald landscape and whilst not nationally designated like the AONB, this landscape is distinctive.

### **Key Sustainability Issues**

3.4.22 The key issues arising from the review of PPPs and baseline information relating to the landscape are:

- A significant proportion of the district is located within the High Weald AONB, which is a nationally protected landscape;;
- The District is located adjacent to the South Downs National Park where there is potential for growth to impact the setting of this nationally designated landscape area;
- Development has the potential to negatively impact the districts landscape and countryside e.g. the High Weald AONB; the Low Weald landscape; the setting of the South Downs National Park;
- Increasing public access to the countryside and landscape can lead to potentially negative effects.

### **Likely evolution without the Local Plan**

3.4.23 The likely evolution without the Local Plan is:

- Infringement on the High Weald AONB without locally derived development policies and standards; and
- Lack of protection to those sites that do not benefit from national or international designation and protection.

### **Possible Local Plan/Policy Approach**

3.4.24 The possible Local Plan/Policy approaches to the key issues are:

- The Local Plan and policies should ensure that they provide sufficient protection to the landscape, valued landscape features and the countryside;
- Ensure that policies in the Plan take full account of the High Weald AONB landscape and the Management Plan; and
- It will be important to provide policies to deliver the recommendations relating to the green infrastructure evidence base/strategy

### **Sustainability Appraisal Objectives**

3.4.25 In order to address these sustainability issues, there should be sustainability appraisal objectives dealing with:

- Protecting and enhancing the countryside, landscape (in particular the High Weald AONB) and green/natural spaces;
- Reduce pollution, improve air quality; and
- The creation of green infrastructure

## 3.5 Water Resources

### Relevant Plans, Policies and Programmes (PPPs)

#### International

3.5.1 At the international level the following PPPs are relevant to the issue of water resources:

- UN Resolution 2015 Transforming our world: the 2030 Agenda for Sustainable Development (2015)

3.5.2 The 2030 Agenda is determined to conserve and sustainably use freshwater resources; tackle water scarcity and water pollution and ensure more efficient use of water. The document sets out 17 'Sustainable Development Goals' and number 6 is to:

*"Ensure availability and sustainable management of water and sanitation for all"*  
(Goal 6)

#### European

3.5.3 At the European level, the most relevant PPPs to the matter of water resources are:

- **The Habitats Directive (1992/43/EEC)** – adopted in 1992, this Directive ensures the conservation of a wide range of rare, threatened or endemic animal and plant species. Some 200 rare and characteristic habitat types are also targeted for conservation in their own right. It aims to promote the maintenance of biodiversity, taking account of economic, social, cultural and regional requirements. It forms the cornerstone of Europe's nature conservation policy, together with the Birds Directive, and establishes the EU wide Natura 2000 ecological network of protected areas, safeguarded against potentially damaging developments;
- **European Urban Waste Water Directive (1991)** – this seeks to protect the environment from the adverse effects of urban waste water collection, treatment and discharge, and discharge from certain industrial sectors;
- **European Drinking Water Directive (1998)** – this seeks to protect human health from the adverse effects of any contamination of water intended for human consumption by ensuring that it is wholesome and clean;
- **The EU Water Framework Directive 2000/60/EC** – this Directive sets out rules to halt deterioration in the status of European Union (EU) water bodies and achieve 'good status' for Europe's rivers, lakes and groundwater, with a deadline of 2015 for this to be achieved. This deadline has not been achieved and work continues under the Directive. Specifically, the Directive aims to:
  - Protect all forms of water (surface, ground, inland and transitional);

- Restore the ecosystems in and around these bodies of water;
- Reduce pollution in water bodies; and
- Guarantee sustainable water usage by individuals and businesses.

3.5.4 As a package of legislation the above Directives are seeking to ensure that water resources are managed sustainably, taking into account the impacts of climate change, and that water quality is protected, maintained and improved where necessary. As with most EU legislation, the aims, objectives and approaches have been transposed into national policy.

### National

3.5.5 The Conservation of Species and Habitats Regulations (2017), the “Habitats Regulations”, provide the overarching framework for the protection of habitats and species in the UK and this is fed through into the NPPF. These Regulations were amended by the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018).

3.5.6 The legislation sets out the requirements for determining if a plan or project may affect the protected features of a habitat site before deciding whether to undertake, permit or authorise it. In relation to water resources, this applies to designated sites that are dependent on water quality and quantity for their habitats and species, such as the Pevensy Levels Ramsar site and SAC in Wealden.

3.5.7 The government’s 25 Year Environment Plan (2018) includes as one of its goals the need to deliver cleaner water, acknowledging that this is one of the raw materials we draw from the planet in order to live and so it is critical that it is protected and enhanced. As part of its policies on water, the Plan states that it will reform the UK’s approach to water abstraction, increase water supply and incentivise greater water efficiency and less personal use. It also includes policies on reducing the impact of wastewater on the environment; minimising the risk of chemical contamination in our water and continuing to maintain clean recreational waters.

3.5.8 The Environment Bill (2020) seeks to manage water sustainably, taking into account the impacts of climate change. The water measures put forward in the Bill will help to secure long-term, resilient water and wastewater services, making sure that the UK has a cleaner, greener and more resilient country for the next generation. The Bill reforms elements of abstraction licensing to link it more tightly to the 25 Year Environment Plan goal of restoring water bodies to as close to natural state as possible.

3.5.9 The Environment Bill introduces additional requirements for Water Company planning for future water supply and wastewater and drainage networks, enabling more resilient solutions to drought and flooding. It also creates a power to update the list of priority substances and their respective standards which are potentially harmful to surface waters and groundwater.

3.5.10 The Bill states an intention to maintain and improve environmental designations as the UK leaves the EU. Legislative changes arising from this Bill will

be reflected in updates to the Sustainability Appraisal process as the Council progresses with the Local Plan.

3.5.11 On 16th March 2020, the Environment Agency launched the National Framework for Water Resources to transform the way we use and look after our water supplies. The framework will help reduce demand, halve leakage rates, develop new supplies, move water to where it's needed and reduce the need for drought measures that can harm the environment. The framework looks to reduce consumption to an average of 110 litres per person per day by 2050, amongst other measures to improve efficiency and security of supply.

3.5.12 The South East River Basin Management Plan was published in December 2015 by DEFRA and the Environment Agency and confirms the actions to improve the water environment by 2021. It sets out the Environment Agencies position that in the Southern Region, local government should set out local plan policies requiring new homes to meet the stricter water efficiency standard of 110 litres per person per day as described in relevant parts of the Building Regulations.

3.5.13 In the absence of such a policy, all new homes have to meet the mandatory national standard set out in the Building Regulations of 125 litres/person/day. However, this does not preclude development proposals from aiming for lower water use.

3.5.14 The Southern Water 'Water Resource Management Plan 2020-2070 sets out how the company intends to supply healthy, reliable drinking water to more than one million homes and businesses for the next 50 years. It is published every five years to reflect changes in customer views, the need to protect the environment and the latest information on climate change and housing growth figures.

3.5.15 South East Water's Water Resources Management Plan<sup>43</sup> 2020 to 2080, sets out the companies' estimate of the amount of water it will need, and what it will need to do – where and by when – to meet those future water needs. The Plan, amongst other measures, will seek to reduce leakage by a further 15% by 2025 (there has already been a reduction of 8% between 2010/11 and 2017/18) and commits to halving leakage levels by 2050. They are also committing to applying innovative behavioural economics techniques as part of their wider water efficiency programme. This will see average customer water use reduce from 150 litres per person per day in 2017/18 to 139 litres per person per day in 2025, 118 litres per person per day in 2045 and 90 litres per person per day in 2080.

3.5.16 The Plan also:

- Is resilient to a 1:200 year drought event;
- Eliminates the risk of invasive non-native species being transferred between river catchments; and
- Takes account of uncertainty around the impact of necessary abstraction reductions to ensure the water used is sustainable

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<sup>43</sup> <https://corporate.southeastwater.co.uk/media/3465/sew-final-wrmp-2020-2080.pdf>

3.5.17 Water, People, Places: A Guide for master planning sustainable drainage into developments was prepared by the Lead Local Flood Authorities of the South East of England. This guidance outlines the process for integrating sustainable drainage systems (SuDS) into the master planning of large and small developments, including how to design them into sites with varying site conditions i.e. on sites with high groundwater levels; flat sites; sites with poor permeability etc. Consideration of the movement of water and its interaction with space at the earliest stage of design is crucial to the success of SuDS and allows the developer to maximise wider benefits. This guidance complements existing guidance on SuDS design, maintenance and operation which should be used to inform detailed design and delivery of SuDS.

3.5.18 The guidance states that SuDS should not be thought of as individual items, but as an interconnected system, where water slowly flows from where it falls to a soakage area or discharge point through a series of features that help to treat, store, re-use, convey and celebrate water. An important concept for any SuDS design to follow is known as the 'treatment train'. By passing water through several stages of treatment, sediment and other pollutants will be removed more effectively, and maintenance costs are reduced as this minimises the risk of downstream SuDS features becoming clogged or blocked. This will assist in ensuring water quality is maintained and in some instances improved.

3.5.19 Pollution typically found in runoff including sediment, oils, metals, fertilizer, pesticides, and rubbish can be harmful to watercourses and coastal waters. The soils, gravels and vegetation present in many forms of SuDS act as filters, removing many pollutants before returning cleansed water to the natural environment. The guidance sets out the different SuDS measures that can be used in the treatment train, where they are suitable and the context they need.

3.5.20 The guidance also highlights that South East England is a water stressed region and that many SuDS features can be used locally to capture, treat and manage water for re-supply of cleansed water to buildings or landscapes. Rainwater harvesting can be installed at a range of scales, from individual property scale to site-wide scale, by storing treated runoff at the end of a SuDS treatment train. Re-using rainwater for non-potable purposes such as irrigation and toilet flushing will help reduce potable water demand.

3.5.21 The National Planning Policy Framework (2019) includes a number of measures/actions related to water resources and water quality. The NPPF requires that strategic policies set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for infrastructure for water supply and wastewater. It also requires plans to set out the infrastructure required for water management and take into account the long term implications of climate change on water supply when looking at approaches to mitigation and adaptation.

3.5.22 The NPPF also states that planning policies and decisions should contribute to and enhance the natural and local environment by preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of water pollution and that wherever possible development should "...*help to improve local environmental conditions such*

*as air and water quality, taking into account relevant information such as river basin management plans” (para 170 (e)).*

## Local

3.5.23 The Environment Agency’s River Basin Management Plan (RBMP) South East River Basin District (2009) provides a framework for protecting and enhancing the benefits provided by the water environment and incorporates the requirements / objectives of the Water Framework Directive, together with the programme of measures to achieve them.

3.5.24 The Environment Agency’s Part 1 South East River Basin District RBMP (2015) sets out the current state of the water environment, the pressures affecting it, the environmental objectives for protecting and improving it, the programmes of measures / actions needed to achieve the objectives and the progress made since the 2009 RMBP. Wealden District also lies within the Thames River Basin District and therefore that RBMP is also relevant to the local context in terms of the district’s water environment.

3.5.25 The River Basin Districts are further subdivided into smaller catchments and three catchments cover Wealden – Adur & Ouse and the Cuckmere and Sussex Havens in the South East RBMP and the Medway in the Thames RBMP.

3.5.26 The South East River Basin Management Plan (2015) informs decisions on land use planning because water and land resources are closely linked. It contains:

- **Baseline classification of the quality of water bodies** with the intention of preventing water bodies deteriorating;
- **Statutory objectives for protected areas** highlighting the areas of land and bodies of water that have specific uses that need special protection;
- **Statutory objectives for water bodies which are legally binding objectives for each quality element in every water body**, including an objective for the water body as a whole with the default objective of ‘good’ status unless natural conditions, technical feasibility or disproportionate cost make improvement impractical by 2021 or by 2027 where it would be more appropriate, have less impact on existing activities or where the environment will need more time to respond to the planned measures; and
- **Summary programme of measures to achieve statutory objectives.**

3.5.27 The document highlights that priority issues for the Cuckmere and Pevensey Levels catchment are diffuse pollution, physical obstructions to fish passage and non-native invasive species. These are preventing the waters achieving ‘good status’ under the Water Framework Directive.

3.5.28 The Environment Agency also develop Abstraction Licencing Strategies for catchment areas which set out how water resources are managed by the Agency within each catchment. For Wealden, the relevant Abstraction Licencing Strategies

are the Cuckmere and Pevensey Levels Abstraction Licencing Strategy (March 2019)<sup>44</sup> and the Adur & Ouse Abstraction Licencing Strategy (March 2019)<sup>45</sup>.

3.5.29 The Environment Strategy for East Sussex (2020) has identified five priority environmental themes aligning with international and national policy, these are: climate change, natural capital, air quality, water and resource efficiency. It highlights a specific action in relation to water consumption, which is to deliver advice and home visits/business audits to assist households and businesses to reduce water usage.

## **Baseline and Trends**

### Water consumption

3.5.30 On average, a person in England currently uses 141 litres of water per day<sup>46</sup>. Metering is the strongest tool in the box for reducing consumption, with metered customers using around 33 litres less per day on average. South East Water are the water company supplying Wealden District and the average water consumption of their customers is 151 litres per person per day.

3.5.31 South East Water abstracts a significant amount of water from Hazards Green in the Wallers Haven for the public water supply to serve existing residents. As evidenced within the Cuckmere and Pevensey Levels Abstraction Licensing Strategy (March, 2013), no increase to this licence will be issued due to the sensitivity of the Pevensey Levels ecosystem to changes in water levels.

3.5.32 Wealden District is an area of 'serious water stress' as is much of the South East of England. This means that:

- the current household demand for water is a high proportion of the current effective rainfall which is available to meet the demand; or
- the future household demand for water is likely to be a high proportion of the effective rainfall available to meet that demand.

### Water quality

3.5.33 Water quality issues and the ways in which they are addressed need to be considered in line with the requirements of the Water Framework Directive (WFD) (2000/60/EC) which aims to:

- Prevent any deterioration in the water quality and ecosystems of waterbodies;
- promote sustainable water use on a long term protection of water resources;
- enhance protection and improvement of the aquatic environment;
- reduce the pollution of groundwater and prevent further pollution; and
- contribute to mitigating the effects of floods and droughts.

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<sup>44</sup> <https://www.gov.uk/government/publications/cuckmere-and-pevensey-levels-catchment-abstraction-licensing-strategy>

<sup>45</sup> <https://www.gov.uk/government/publications/adur-and-ouse-catchment-abstraction-licensing-strategy>

<sup>46</sup> Source: Discover Water as cited in WWT PR19 Challenge Report #5 Water Consumption (2019). Available at: <https://waterwise.org.uk/wp-content/uploads/2019/10/WWT-Report-.pdf>



3.5.34 Within the District, the Cuckmere and Pevensy Levels Catchment has seen a somewhat consistent pattern in the water quality of its surface waterbodies. There are a total of 18 waterbodies within the catchment, 17 are categorised as river, canal and surface water transfers and one as a lake within the Environment Agency's Catchment Data Explorer<sup>47</sup>.

3.5.35 Table 5 presents the status of the surface waterbodies as classified under the WFD:

Year	Ecological status or potential					Chemical status	
	Bad	Poor	Moderate	Good	High	Fail	Good
2015	0	6	11	1	0	1	17
2016	0	5	12	1	0	0	18
2019	0	6	11	1	0	18	0

**Table 5: Ecological and chemical classification for surface waters Cycle 2 2015; 2016 and 2019**

3.5.36 The aim is that by 2027 and beyond, 14 of the surface waterbodies will be in good ecological status with 4 being in moderate ecological status.

3.5.37 The main issues preventing waters reaching good status within the Cuckmere and Pevensy Levels catchment relate to pollution from waste water treatment works and pollution from agriculture and rural land management. Physical modifications related to agricultural and rural land management are also a key issue<sup>48</sup>.

3.5.38 The Pevensy Levels SAC and Ramsar site lies within the catchment area and one of the key aspects to maintaining its designation is that of water quality and water levels. The main source of water for the Levels comes from the Hailsham North and South Waste Water Treatment Works (WwTW), which discharge treated effluent into the Levels under strict discharge consents from the Environment Agency. These are operated by Southern Water.

3.5.39 The EA has previously expressed concerns in regards to new development within the catchment area of the Hailsham North and South WwTWs because of the relationship between the discharge of treated effluent and the continued decline in ecological quality downstream from them both.

3.5.40 However, Southern Water have identified and initiated works to enable a high rate biological treatment process that is capable of meeting the requirement to achieve a high quality effluent to come forward. Southern Water's Position Statement of December 2019 states that the deadline for the construction, commissioning and operation of the process is 22nd December 2021 but that in the interim they are working with the Environment Agency and Natural England to develop an 'Operating Agreement' to achieve the required high quality effluent from the works.

<sup>47</sup> <https://environment.data.gov.uk/catchment-planning/ManagementCatchment/3022/Summary>

<sup>48</sup> Summary Table: Reasons for not achieving good status. Available at: <https://environment.data.gov.uk/catchment-planning/summarypages/summary/ManagementCatchment/3022>

3.5.41 Works to upgrade the Hailsham North WwTWs were granted planning permission by East Sussex County Council on 7th November 2019. Works to upgrade the Hailsham South WwTWs were granted planning permission on 10th January 2020.

3.5.42 It should also be considered that development in south Wealden may connect to the Eastbourne WwTW as the nearest point of capacity, which may have the effect of reducing available capacity for development in Eastbourne, for which the Eastbourne WwTW would be the only option

3.5.43 Water quality is not only governed by the quantity and type of contaminants but also the volume and velocity of the water conveying them. Chemical contaminants carried by water have the possibility of affecting wetland habitat and impacting upon soils, flora and fauna. Pollutants can reach waterbodies in a number of ways:

- Surface water running directly into watercourses;
- Drainage systems which discharge surface water runoff through pipes into the channel;
- Groundwater pollution (although this is rare as groundwater is generally protected from pollution by the overlying layers of soil and rock); and
- Surface water collected by the sewer system

3.5.44 Surface water run-off has the potential to be a major source of water pollution within the district. Pollutants reach wetland areas/watercourses mainly through run-off whereby water flows over impervious surfaces picking up a number of pollutants generated by human activity. Such pollutants can include sediment from construction sites, toxic metals and petroleum wastes from roadways and industrial or commercial areas, nutrients and bacteria from residential areas and nutrients and pesticides from agriculture and gardening activities.

3.5.45 The protection of groundwater is particularly important in Sussex as a whole, since the majority of the public water supply is abstracted from water-bearing strata or aquifers. Groundwater Source Protection Zones (SPZs) are identified and mapped by Defra and the Environment Agency, which indicate where there are likely to be particular risks to the quality or quantity of groundwater. There are a number of groundwater SPZs within Wealden (see Figure 14) and any new development will be expected to comply with the requirements of the Environment Agency in order to ensure that it does not pose a risk or result in damage to groundwater supplies or other water resources.

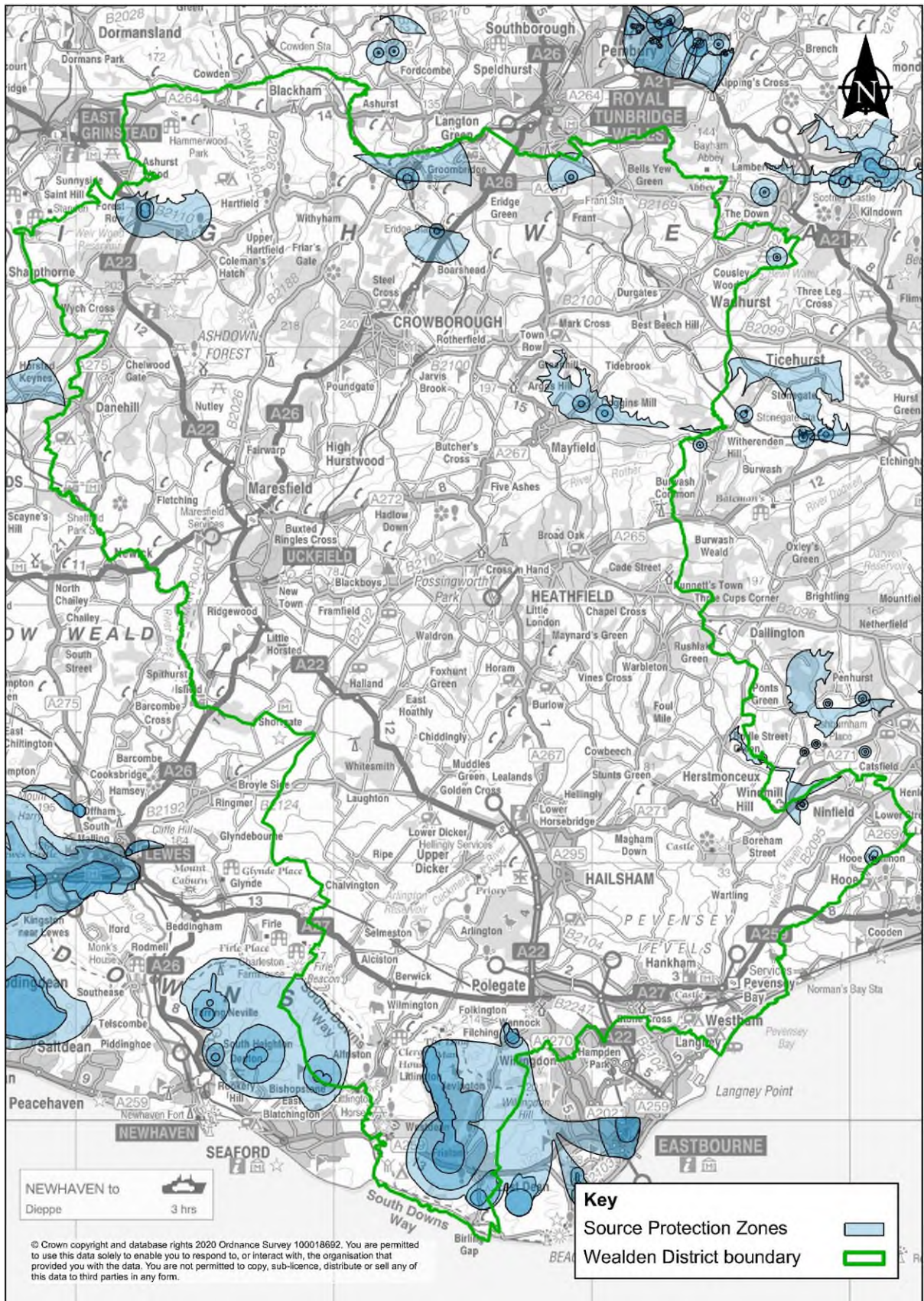


Figure 14: Groundwater Protection Zones - Wealden



## **Key Sustainability Issues**

3.5.46 The key issues arising from the review of PPPs and baseline information relating to water resources are:

- An increase in development will place extra pressure on the districts water resources;
- Development proposals can lead to an increase in impermeable surfaces which not only exacerbate flood risk from surface water runoff but also result in the conveyance of pollutants to watercourse – both of which can have impacts on water quality; and
- Climate change will impact water resources in terms of water supply as well as water quality i.e. hotter drier summers increasing demand for water supply; less frequent rainfall.

## **Likely evolution without the Local Plan**

3.5.47 The likely evolution without the Local Plan is:

- Reducing water consumption will rely on South East Water's Management Plan which has lengthy milestones and spans a 60 year period – reductions may not be met in a timely manner; and
- New development will have to meet Building Regulations requirements for water consumption but WDC may not be able to implement the tighter 110 litres/person/day.

## **Possible Local Plan/Policy Approach**

3.5.48 The possible Local Plan/Policy approaches to the key issues are:

- Include a policy that requires the stricter water consumption target of 110litre/person/day contained within the Building Regulations for new development, where the evidence supports such an approach;
- Include an overall SuDS policy within the Plan that follows the drainage hierarchy and measures set out in the ESCC Flood Risk Management Plan as these can assist in preventing water quality deterioration and improving water quality;
- Ensure that the Pevensey Levels SAC and Ramsar site is fully taken into account in terms of any development proposals within its catchment so as to ensure the species and habitats it is designated for are protected and enhanced, where possible;
- Ensure that any policies take account of the measures set out in South East Water's Management Plan to ensure they are complementary and are not in conflict, where possible;
- Ensure that climate change is fully taken into account in any policies related to water resources – both the need for mitigation and adaptation.
- The Local Plan needs to ensure that new development will not cause deterioration of the status of any ground or surface water bodies (including transitional/estuarial and coastal waters) and that it does not compromise any

other improvements to meet good ecological status in the future as required by the Water Framework Directive.

### **Sustainability Appraisal Objectives**

3.5.49 In order to address these sustainability issues, there should be sustainability appraisal objectives dealing with:

- Improving water quality and water efficiency;
- Reduce water pollution;
- Adaptation and mitigation of flooding and flood risk; and
- The effects of climate change on water resources.

## 3.6 Flooding

### Relevant Plans, Policies and Programmes (PPPs)

#### International

3.6.1 At the international level the following PPPs are relevant to the issue of water resources:

- UN Resolution 2015 Transforming our world: the 2030 Agenda for Sustainable Development (2015)

3.6.2 The 2030 Agenda is committed to tackling the causes and impacts of climate change, which include flooding. The document sets out 17 ‘Sustainable Development Goals’ and Goal 13 is to:

*“Take urgent action to combat climate change and its impacts”*

#### European

3.6.3 At European level, the most relevant PPPs to the issue of flooding are:

- **European Floods Directive (2007)** - which provides a framework for the assessment and management of flood risk, aiming at the reduction of the adverse consequences for human health, the environment, cultural heritage and economic activity.

#### National

3.6.4 The Flood and Water Management Act (2010) sets out measures to ensure that risk from all sources of flooding, not just rivers and seas, are managed more effectively. This includes: incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; roll back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems.

3.6.5 The Act also sets out who is responsible for managing flood risk. The Environment Agency has a strategic overview role and manages flood risk from main rivers, the sea and large reservoirs, whilst County and Unitary Authorities have a new leadership role in local flood risk management, covering all other sources of flood risk.

3.6.6 The National Planning Policy Framework (2019) includes a number of measures/actions related to managing flood risk and many of these have cross overs with other areas i.e. climate change and the natural environment/biodiversity.

3.6.7 The NPPF makes it clear that development in areas at risk of flooding should be avoided and directed away from areas at highest risk (whether existing or future). However, it does state that where development is necessary in such areas, “...the

*development should be made safe for its lifetime without increasing flood risk elsewhere” (para 155).*

3.6.8 Furthermore, the NPPF requires strategic policies to be informed by a strategic flood risk assessment and should manage flooding from all sources. Strategic policies should consider “...cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards” (para 156)

3.6.9 In order to decide on the location of development, either within local plans or on an application basis, a sequential risk-based approach should be taken - taking into account the current and future impacts of climate change - so as to avoid, where possible, flood risk to people and property. Having done this, the NPPF (para 157) requires that any residual risk should be managed by:

- a) applying the sequential test and then, if necessary, the exception test;
- b) safeguarding land from development that is required, or likely to be required, for current or future flood management
- c) using opportunities provided by new development to reduce the causes and impacts of flooding (where appropriate through the use of natural flood management techniques); and
- d) where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations

3.6.10 The aim of the sequential test is to steer new development to areas with the lowest risk of flooding and development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. If it is not possible for development to be located in zones with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in national planning guidance.

3.6.11 The application of the exception test should be informed by a strategic or site specific flood risk assessment, depending on whether it is being applied during plan production or at the application stage. For the exception test to be passed it should be demonstrated that:

- a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and
- b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

3.6.12 The NPPF requires both parts of the exception test to be satisfied for development to be allocated or permitted (para 161).

3.6.13 In order to manage flood risk moving forward, developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate.

### Local

3.6.14 As already mentioned in paragraphs 3.5.23 – 3.5.26 there are three river catchment areas covering Wealden. Each of these catchments has a Catchment flood management plan (CFMP) produced by the Environment Agency, which considers all types of inland flooding, from rivers, ground water, surface water and tidal flooding, but not flooding directly from the sea, (coastal flooding), which is covered in 'shoreline management plans.

3.6.15 Only the Cuckmere and Sussex Havens CFMP<sup>49</sup> is applicable to Wealden. It sets out several measures to influence and work with the Council on under policy sub-areas 3; 5 and 6. Wealden District Council is partners to other policy sub-areas but with no specific measures.

- Sub area 3
  - Work with Wealden District Council to influence spatial development with the aims of ensuring no net increase in run-off from new developments (including the use of Sustainable urban Drainage Systems(SuDS)) and to ensure adequate foul and surface water infrastructure is available before new development; and
  - Work with Wealden District Council and the water companies to develop a Surface Water Management Plan (SWMP), with review of receiving watercourses/ catchments, foul and surface water, and consider the effects of climate change.
  
- Sub area 5
  - Work with Wealden District Council and Rother District Council to influence spatial development with the aims of ensuring no net increase in run-off from new developments; and
  - Work with Wealden District Council and the water companies to develop a Surface Water Management Plan (SWMP) for Heathfield to review capacity and vulnerability of groundwater, soil percolation, watercourses, and foul and surface water sewers and consider the effects of new development.
  
- Sub area 6
  - Work with Wealden District Council and Eastbourne Borough Council to influence spatial development with the aims of ensuring no net increase in run-off from new developments and to encourage the use of Sustainable urban Drainage Systems (SuDS) in all new developments that do not contribute to the public sewer system.

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<sup>49</sup> <https://www.gov.uk/government/publications/cuckmere-and-sussex-havens-catchment-flood-management-plan>



3.6.16 A Catchment Partnership has been established for each of the catchments mentioned above in order to direct and co-ordinate relevant activities and projects within the catchments through the production of a Catchment Management Plan. For Wealden, the relevant Catchment Partnership is the Cuckmere and Pevensey Levels CP<sup>50</sup>.

3.6.17 At the Council level, Wealden undertook a Strategic Flood Risk Assessment (SFRA) in 2017. This provides information of the type and level of flood risk within the district, taking into account the effects of climate change on the extent and frequency of different types of flooding, as well as mapping of flood risk and an analysis of flood risk for a number of sites in the district.

3.6.18 The SFRA (2017) makes recommendations for criteria that should be used to assess future development proposals and the development of the Sequential Test and sequential approach to flood risk. The SFRA will be updated as part of the work on the new Wealden Local Plan and will indicate locations that development should be steered away from, and if necessary the process for locating development sequentially and undertaking the exception test.

3.6.19 The East Sussex Local Flood Risk Management Strategy (LFRMS) provides the framework for the management of local flood risk in the county for the ten year period 2016 – 2026. It is supplemented by a series of technical appendices which provide further detail on the management of local flood risk in East Sussex including the responsibilities of the various bodies involved in risk management, the assessment of risk, the legal context and funding mechanisms.

3.6.20 The scope of the strategy is defined by the Flood and Water Management Act and therefore focuses on the management of flood risk from surface water, groundwater and ordinary watercourses. The Environment Agency remains responsible for the management of coastal and main river (or fluvial) flooding and the district and borough councils retain responsibility for the management of coastal erosion risk. The principle aims of the Strategy include:

- the implementation of a proportionate approach to managing risk;
- managing flood risk as part of the planning process;
- ensuring that landowners and property owners are aware of their responsibilities;
- the communication of flood risk information to those who need it;
- improving the evidence base;
- partnership working to deliver solutions to flooding problems; and
- identifying opportunities to bid for external funding to assist in delivering solutions.

3.6.21 East Sussex County Council is the Lead Local Flood Authority (LLFA) as defined under the Flood and Water Management Act 2010<sup>51</sup>. The Council is a key partner in planning local flood risk management and can carry out flood risk management works on minor watercourses working with the LLFA and others,

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<sup>50</sup> <http://www.cplcp.org.uk/>

<sup>51</sup> Flood and Water Management Act 2010: <http://www.legislation.gov.uk/ukpga/2010/29/contents>

including through taking decisions on development in the district which ensure that risks are effectively managed.

3.6.22 The Council, together with the LLFA, manages flood risk from all sources except main rivers, the sea and large reservoirs. These risks are managed by the Environment Agency.

3.6.23 The Pevensey and Cuckmere Water Level Management Board (WLMB) are currently carrying out a scoping study, channel survey and hydraulic modelling programme for the catchment to better understand the movement of water through the system and how this may impact on flooding and flood risk.

### **Baseline and Trends**

3.6.24 Parts of the district have a particular susceptibility to surface water flooding as a result of under capacity in the local drainage system; blockages within culverts or drains and increased surface runoff in times of intense rainfall. Therefore, in addition to the SFRA some areas also have Surface Water Management Plans (SWMP):

- Forest Row (2015);
- Crowborough (2015);
- Heathfield (2015);
- Hailsham and Hellingly (2015);
- Eastbourne/Polegate/Willingdon (2012); and
- Uckfield (2016).

3.6.25 Flooding may also occur due to a failure in the sewerage infrastructure. At present, developers need to provide evidence that adequate capacity exists in the public sewerage and water supply network to serve their development. Where capacity does not exist and to avoid overloading of existing infrastructure, a drainage strategy is required to show the necessary infrastructure and its funding.

3.6.26 The district has some land within flood zones 2 and 3 (see Figure 15). Zone 3 is further sub-divided into zone 3a and zone 3b, whereby zone 3b is also referred to as the functional floodplain.





**Figure 15: Flood Zones 2 and 3 - Wealden**

3.6.27 The primary sources of flooding within the District are fluvial (river) flooding from the River Cuckmere and River Uck, tidal flooding as a result of sea defences

being breached, primarily at Pevensey and Pevensey Bay, from surface water flooding following periods of intense rainfall and from surcharging drainage systems.

### Fluvial Flood Risk

3.6.28 The principle watercourses flowing through the district are listed in Table 6. Tributaries of these watercourses include other main rivers as well as smaller ordinary watercourses and unnamed drains.

<b>Watercourse</b>	<b>Classification</b>	<b>Description</b>
River Medway	Main River	The headwaters of the River Medway flow through the north of the district intercepting the villages of Forest Row and Hartfield.
Shortbridge Stream	Main River	The Shortbridge Stream is a tributary to the River Ouse and flows through the west of Wealden including the village of Shortbridge.
River Uck	Main River	The River Uck is a tributary to the River Ouse and flows through the west of Wealden including the town of Uckfield. Main Rivers contributing to the Uck within Wealden include Tinkerage Stream, Framfield Stream and Ridgewood Stream
Cuckmere River	Main River	The Cuckmere River is entirely contained within Wealden District and drains a large proportion of south Wealden. The Cuckmere flows through Hellingly, Hailsham and Alfriston. Main Rivers contributing to the Cuckmere include Knockhatch Stream
Pevensey Levels Drains	Main River	There are a number of Main Rivers draining the Pevensey Levels including Waller's Haven, Hurst Haven, Pevensey Haven, Salt Haven and Glynleigh Sewer. These have generally rural catchments, but the headwaters do reach Stone Cross, Polegate and Hailsham

**Table 6: Key watercourses in the District<sup>52</sup>**

3.6.29 Fluvial food risk is most notable on the Pevensey Levels but is also predicted in Uckfield, Crowborough, Forest Row, Horam, Hailsham and Polegate. There are large rural areas at risk of fluvial flooding any of which could potentially be a site for development and understanding this risk is the purpose of the SFRA.

3.6.30 Climate change does not just affect the extent of flooding. Even where flood extents do not significantly change; flooding is likely to become more frequent as a result of climate change. The impact of an event is also likely to become more severe, although there is still uncertainty as to whether extreme events are likely to increase or decrease over the UK in the future, and the magnitude of the localised

<sup>52</sup> WDC Strategic Flood Risk Assessment June 2017  
[https://www.wealden.gov.uk/UploadedFiles/WLP\\_Evidence\\_Base\\_Level\\_1\\_SFRA\\_June\\_2017.pdf](https://www.wealden.gov.uk/UploadedFiles/WLP_Evidence_Base_Level_1_SFRA_June_2017.pdf)



impact of these changes. Further details regarding the uncertainties in predicting the impacts of climate change can be found in:

- [UK Climate Projections \(UKCP09\)](#)
- [Environment Agency \(2016\) Flood Risk Assessments: Climate Change Allowances](#)

### Coastal Flooding

3.6.31 The Wealden District coastline extends from the Seven Sisters to Pevensey Bay. The Seven Sisters are at least 30 metres above sea level and not vulnerable to coastal flooding. However, the Pevensey Levels are potentially vulnerable to flooding of this type given their low-lying nature and reliance on flood defences. The Pevensey defence is provided solely by a large shingle ridge and is managed by Pevensey Coastal Defence Ltd, a public private partnership (PPP) set up to provide long term maintenance of defences. However, there is still a residual risk of tidal flooding, if the defences were to fail.

3.6.32 Climate change is predicted to influence the rate of sea level rise, in addition to offshore wind speed and extreme wave height. The East Sussex coastal modelling completed by the Environment Agency in 2012 tested a number of climate change scenarios and concluded that the Pevensey Levels is sensitive to climate change, with a number of additional properties predicted to be at risk in the future, despite the presence of defences. Understanding the increased coastal flood risk due to climate change will be critical to sustainable development.

### Surface Water Flooding

3.6.33 Surface water flooding occurs when rainfall fails to infiltrate to the ground or enter the drainage system. Ponding generally occurs at low points in the topography. The likelihood of flooding is dependent on not only the permeability of the surface, but also saturation of the receiving soils, the groundwater levels and the condition of the surface water drainage system (i.e. surface water sewers, ESCC highway authority drains and gullies, open channels, ordinary watercourses and SuDS).

3.6.34 The risk of flooding from surface water and/or the sewer network is difficult to predict accurately, and is heavily dependent upon local conditions during the passing of a storm. For example, leaves and/or a parked car may be blocking a gully, water levels within the receiving watercourse may be elevated preventing free drainage from (or backing up of) the sewers.

3.6.35 The updated Flood Map for Surface Water (uFMfSW) predominately follows topographical flow paths of existing watercourses or dry valleys with some isolated ponding locations in low lying areas. The uFMfSW shows surface water flood risk in Wealden is concentrated along watercourses or fluvial corridors.

3.6.36 Surface water flood risk should not form a constraint to development, if it can be appropriately managed. The uFMfSW indicates where surface water flood risk

considerations should be made as part of the planning process. Where there is a surface water flow path through the site, East Sussex County Council advice is that:

- the developer must understand the source of the flow path;
- where possible the flow path should be managed in a green corridor; and
- if diversion of the flow path is required, then the impact upstream, downstream and at the site must be understood.

3.6.37 Climate change is predicted to increase rainfall intensity in the future by up to 40%<sup>53</sup> under the new range of allowances published by the Environment Agency. This will increase the likelihood and frequency of surface water flooding, particularly in impermeable urban areas, and areas that are already susceptible. Changes to predicted rainfall should be incorporated into flood risk assessments and drainage and surface water attenuation schemes associated with developments.

### Groundwater Flood Risk

3.6.38 As part of the Level 1 SFRA, mapping of the whole district was undertaken to identify the areas of groundwater concern<sup>54</sup>. This data, provided by East Sussex County Council, shows where geological and hydrogeological conditions indicate that groundwater is a concern. It does not show the likelihood of groundwater flooding occurring at any particular return period.

3.6.39 Areas of ground water concern are more prevalent in the north and south of the district. In the north, the sandstone geology acts as a secondary aquifer with the potential to hold water within the rock. During high water table periods these areas are at risk of groundwater flooding to basements and at the surface.

3.6.40 The permeable geology of the Low Weald in the south of the district, coupled with low lying topography, presents conditions which could cause groundwater to emerge.

3.6.41 Groundwater flood risk is considered the most prevalent source of flood risk across Wealden and as such, special consideration of this should be made as part of the Local Plan and development management decisions. The areas of groundwater concern should be used to indicate where groundwater flood risk considerations should be made as part of the planning process. East Sussex County Council advice is that:

- consultation should be made with the LLFA at an early stage of the planning process;
- groundwater monitoring over winter should be included; and
- the development design should be resilient to groundwater flood risk.

3.6.42 East Sussex County Council is currently undertaking work on ground water flood risk within the south of Wealden and this will help to inform the next SFRA for the Local Plan as well as the SA going forward.

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<sup>53</sup> <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

<sup>54</sup> See Appendix F of the SFRA (June 2017)

[https://www.wealden.gov.uk/UploadedFiles/WLP\\_Evidence\\_Base\\_Level\\_1\\_SFRA\\_June\\_2017.pdf](https://www.wealden.gov.uk/UploadedFiles/WLP_Evidence_Base_Level_1_SFRA_June_2017.pdf)

3.6.43 The effect of climate change on groundwater flooding problems, and those watercourses where groundwater has a large influence on winter flood flows, is more uncertain. The updated climate change guidance released in February 2016 does not provide information on expected changes to groundwater flooding under future climate change. However, milder wetter winters may increase the frequency of groundwater flooding incidents in areas that are already susceptible, but warmer drier summers could counteract this effect by drawing down groundwater levels to a greater extent during the summer months. Where groundwater flooding is expected to influence a development site, it will be expected that consideration of groundwater flooding under a changing climate is assessed and measures taken to mitigate any change in risk.

#### Properties at risk

3.6.44 As part of work to address properties at risk from flooding within the district, the Council used EA data from their 'High Surface Water Band (properties with a greater than 3.3% chance of flooding each year) and their 'High NaFRA (Fluvial) band (properties with a greater than 3.3% chance of flooding in any given year)' as well as data from East Sussex County Council's Flood Incident Database to identify properties as part of a phased approach.

3.6.45 As part of Phase 1 of the project properties were identified and offered support to reduce flood risk in Alfriston, Hellingly, Uckfield and Forest Row. This part of the project was undertaken in spring 2017-Spring 2018. As part of Phase 2, the project identified and offered support to all other properties at high flood risk across the rest of Wealden in spring 2018 and summer 2019. This means that anyone in Wealden at high risk of flooding has been offered flood resilience support.

#### Key Sustainability Issues

3.6.46 The key issues arising from the review of PPPs and baseline information relating to flooding are:

- Development proposals can lead to an increase in impermeable surfaces which will exacerbate flood risk from surface water runoff;
- Developments will need to be able to adapt to potential for increased flood risk from the impacts of climate change i.e. more intense rainfall events;
- Some parts of the district are already susceptible to surface water flooding and Uckfield has suffered severe flooding several times from the River Uck;
- Surface water from areas of south Wealden drains via Eastbourne Park. Significant surface water discharge through Eastbourne Park has the potential to cause flooding in areas of Eastbourne

#### Likely evolution without the Local Plan

3.6.47 The likely evolution without the Local Plan is:

- Development in inappropriate locations, vulnerable to flood risk of all types;

- Increased water runoff from development through lack of appropriate SuDS techniques; and
- Failure to plan for the expected impacts of climate change on flood risk.

### **Possible Local Plan/Policy Approach**

3.6.48 The possible Local Plan/Policy approaches to the key issues are:

- The Plan and policies should ensure that the sequential and exceptions test are followed when considering the allocation of sites for development;
- The Plan and policies need to be informed by a Strategic Flood Risk Assessment (SFRA) for the district;
- There should be an overall flood risk policy that takes account of the ESCC Flood Risk Management Plan and sets the sequential and exceptions test within the Plan;
- In all areas of the district consideration should be given to sustainable drainage systems (SuDS) to ensure runoff from new developments is limited to that of equivalent Greenfield runoff rates; and
- Any SuDS implementation should be in line with the requirements and standards set out in the ESCC Flood Risk Management Strategy (2016-2026) and the SFRA for the district.

### **Sustainability Appraisal Objectives**

3.6.49 In order to address these sustainability issues, there should be sustainability appraisal objectives dealing with:

- Adaptation and mitigation to flooding/flood risk, taking account of climate change



## 3.7 Soil and Land Contamination

### Relevant Plans, Policies and Programmes (PPPs)

#### International

3.7.1 At the International level, the most relevant PPPs for the issue of soil and land contamination are:

- UN Resolution 2015 Transforming our world: the 2030 Agenda for Sustainable Development (2015)

3.7.2 The Agenda is determined to tackle soil and land pollution as part of its 17 'Sustainable Development Goals'. Goal 2 seeks to end hunger, achieve food security and improved nutrition and promote sustainable agriculture'; Goal 3 seeks to ensure healthy lives and promote well-being for all ages and Goal 12 seeks to ensure sustainable consumption and production patterns. Each Goal has a subset of objectives with some directly related to soil and land contamination:

- Goal 2: By 2030...improve land and soil quality;
- Goal 3: By 2030 substantially reduce the number of deaths and illnesses from hazardous chemicals and air, water and soil pollution and contamination;
- Goal 12: By 2020 achieve the environmentally sound management of all chemicals and all wastes throughout their lifecycle....and significantly reduce their release to air, water and soil in order to minimise their adverse impacts on human health and the environment.

#### European

3.7.3 At the European level, the most relevant PPPs to the issue of soil and land contamination are:

- **European Landfill Directive (1999)** – Prevents and reduces the negative effects on the environment from the landfilling of waste by introducing stringent technical requirements for waste and landfills;
- **European Waste Framework Directive (2008)** - Sets out the waste hierarchy requiring the reduction of waste production and its harmfulness, the recovery of waste by means of recycling, re-use or reclamation and final disposal that does not harm the environment, including human health; and
- **European Industrial Emission Directive (2010)** - Lays down rules on integrated prevention and control of pollution arising from industrial activities. It also lays down rules designed to prevent or, where that is not practicable, to reduce emissions into air, water and land and to prevent the generation of waste, in order to achieve a high level of protection of the environment taken as a whole.

## National

3.7.4 The government's 25 Year Environment Plan (2018) acknowledges that as part of its natural capital approach soil health is crucial. It also recognises the need to tackle the growing problem of waste and soil degradation; recover soil fertility and replenish depleted soil. To reflect this, one of its goals is that by 2030 all of England's soils will be managed sustainably and appropriate soil metrics will be developed.

3.7.5 The Plan also looks to improve soil health through developing a soil health index. Other measures include reducing soil compaction through subsoiling or effective crop rotation in relation to food production; reducing soil erosion from farming and reducing soil pollution from farming activity (use of fertilisers). Policy 3 of the Plan specially seeks to improve soil health through developing better information and data, which at the moment is held piecemeal by different institutions and businesses.

3.7.6 Safeguarding our Soils: A strategy for England (2011) sets out a vision for soil use in England which includes better protection for agricultural soils, protecting stores of soil carbon, improving the resilience of soils to climate change and preventing soil pollution. The essential message in relation to development is that pressure on soils is likely to increase in line with development pressure and the planning system should seek to mitigate this.

3.7.7 In terms of the NPPF (2019), policy relating to soil protection is limited and included within the wider chapter on conserving and enhancing the natural environment. Para 170 (a) and (e) does however state that:

*“Planning policies and decisions should contribute to and enhance the natural and local environment by...protecting and enhancing valued landscapes, sites of biodiversity or geological value and **soils** (in a manner commensurate with their statutory status or identified quality in the development plan”*

*“Planning policies and decisions should contribute to and enhance the natural and local environment by...preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of **soil**, air, water or noise pollution or land instability”*

3.7.8 With regards to land contamination, the NPPF (2019) is again limited, however para 178 (a) does state that:

*“Planning policies and decisions should ensure that... a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation)”*

3.7.9 The NPPF does make it clear that where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner (para 179).

### Local

3.7.10 Local Authorities have a statutory duty to deal with contaminated land within their area. The Town and Country Planning Act 1990 also gives powers to Local Authorities to ensure that land that is contaminated is cleaned up so that it is suitable for its proposed use.

3.7.11 Part 2A of the Environmental Protection Act 1990 places a duty on the Council to publish a contaminated land strategy, inspect its area in accordance with the strategy and to keep a public register of prescribed particulars regarding remediation notices, remediation statements or declarations, appeals and notifications in relation to land formally determined as 'contaminated land'. It is not a 'register of contaminated land', a common misconception.

### **Baseline and Trends**

3.7.12 Impacts on soil include the loss of productive areas and erosion of soils due to construction activities, as well as contamination from the use of chemical agents, and past contamination from lead in vehicle exhausts and other toxic land uses and processes. Impacts on soil also include contamination and erosion from agricultural practices and farming.

### Land contamination

3.7.13 There is increased pressure to redevelop brownfield sites (sites that have been previously developed). It is important to ensure that elevated levels of contamination identified on these sites are reduced to levels which no longer pose a significant risk to human health or the wider environment. As a predominantly rural district, there are few brownfield sites within Wealden. However, commercial premises, including farm yards and barns, may be affected by contamination due to past uses. Such contamination may have occurred due to oil leaks, buried waste, asbestos containing materials, leaking pesticides etc.

3.7.14 Permitted Developments such as the conversions of offices to residential premises, may also fall into the category of contaminated land. This is because such premises, if built before the year 2000 are likely to contain asbestos containing materials (ACMs) which could form a Source-Pathway-Receptor linkage with future receptors. Therefore a suitable Asbestos survey would be required and potential removal of any ACMs.

3.7.15 The Council's approach to dealing with contaminated land can be found on the website<sup>55</sup> together with the Contaminated Land Strategy<sup>56</sup> which sets out the Council's approach for the identification, inspection, assessment and remediation of contaminated land.

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<sup>55</sup> <https://www.wealden.gov.uk/environment-and-pollution/pollution/land-that-may-be-contaminated/>

<sup>56</sup> <https://www.wealden.gov.uk/aefiles/UploadedFiles/ContaminatedLandstrategy.pdf>

## Soil

3.7.16 There is no significant local data on the health of the districts soils however the national picture gives a very good indication of the likely situation for the district as well as the opportunities that exist to improve it.

3.7.17 Improving soil health has emerged as one of the potential environmental beneficiaries of leaving the EU. It is seen as an opportunity to take ownership of all aspects of national soils policy in order to help meet the target of sustainable managed soils by 2030 enshrined in the 25 Year Plan for the Environment<sup>57</sup>.

3.7.18 The Environment Agency published 'The State of the Environment: Soil'<sup>58</sup> report in June 2019 which provides historical context in support of the above view. The Common Agricultural Policy prioritised food production over environmental concerns for example, whilst the abandonment of the European Union Soils Framework Directive created a policy vacuum. Meanwhile, at a national level, investment in national and local farming advisory services, soil training and enforcement has declined.

3.7.19 All of these factors contributed to the situation described in the Environment Agency's report whereby soil's ability to carry out essential environmental services is under serious threat. Across the board the signs are worrying. Soil's role in carbon storage, flood prevention, food production and as a home to biodiversity are in jeopardy. Soil degradation is both a driver and an indicator of climate change.

3.7.20 There are many benefits of having healthy soils including the fact that soil holds 3 times as much carbon as the atmosphere, it reduces the risk of flooding by absorbing water, it is a wildlife habitat and it delivers 95% of global food supplies<sup>59</sup>.

3.7.21 UK soil contains about 10 billion tonnes of carbon, roughly equal to 80 years of annual greenhouse gas emissions. Intensive agriculture has caused arable soils to lose 40 to 60% of their organic carbon, and the impacts of climate change pose further risks. Extended periods of wet weather can cause widespread damage to soil structure with very heavy rainfall and thunderstorms causing soil erosion which exacerbates flood risks.

3.7.22 Some of the key findings from the EA's report are:

- Soil is an important natural capital resource, providing many essential services;
- There is insufficient data on the health of our soils and investment is needed in soil monitoring;
- Soil degradation was calculated in 2010 to cost £1.2 billion every year;

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<sup>57</sup> <https://sustainablesoils.org/environment-agency>

<sup>58</sup> Environment Agency (June 2019). The state of the environment: soil. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/805926/State\\_of\\_the\\_environment\\_soil\\_report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/805926/State_of_the_environment_soil_report.pdf)

<sup>59</sup>

- Almost 4 million hectares of soil are at risk of compaction in England and Wales, affecting soil fertility and our water resources, and increasing the risk of flooding;
- Over 2 million hectares of soil are at risk of erosion in England and Wales;
- Soil biodiversity and the many biological processes and soil functions that it supports are thought to be under threat;
- Wasting food and growing crops for bioenergy are putting additional pressure on soils;
- Spreading of some materials can give rise to contamination. Some 300,000 hectares are contaminated in the UK;
- Microplastics are widespread in soil with unknown consequences; and
- The Environmental Land Management Scheme provides an opportunity to reward farmers for protecting and regenerating soils

### **Key Sustainability Issues**

3.7.23 The key issues arising from the review of PPPs and baseline information relating to soil and land contamination are:

- There is no significant local data on the health of the districts soils;
- Development could lead to increased soil compaction and erosion, primarily during the construction phase of development;
- Where policies and development fail to protect soils this could result in the release of large quantities of CO<sub>2</sub> into the atmosphere as well as impeding the soils ability to store carbon;
- Failure to protect soils will have negative impacts on soil health and its ability to sustain the flora and fauna that depend on it;
- Soil erosion and compaction contributes to increased flood risk;
- Development can involve the importation of soil which may have negative effects in terms of the fact it is potentially not 'local' soil and it can introduce invasive species; and
- The remediation of contaminated land can be expensive but if not done, or if done incorrectly, this can pose a significant health risk to people and the environment.

### **Likely evolution without the Local Plan**

3.7.24 The likely evolution without the Local Plan is:

- Pressure on soils is likely to increase in line with development pressure.

### **Possible Local Plan/Policy Approach**

3.7.25 The possible Local Plan/Policy approaches to the key issues are:

- The Local Plan and policies need to consider the impact on soils of development, particularly for specific sites, and seek to develop criteria relating to how soil is dealt with in development sites i.e. measures to reduce compaction, to limit the importing of soil to a site as much as possible; and

- The Local Plan could consider the possibility of polices connected to leaving areas of land to allow for soil health to recover.

### **Sustainability Appraisal Objectives**

3.7.26 In order to address these sustainability issues, there should be sustainability appraisal objectives dealing with:

- Protect and enhance habitats and biodiversity;
- Minimise waste; and
- Remediation of contaminated land.

## 3.8 Air Quality

### Relevant Plans, Policies and Programmes (PPPs)

#### International

3.8.1 At the International level, the most relevant PPPs relating to air quality are:

- UN Resolution 2015 Transforming our world: the 2030 Agenda for Sustainable Development (2015)

3.8.2 The Agenda is seeking to end poverty, protect the planet and improve the lives and prospects of everyone. The document sets out 17 ‘Sustainable Development Goals’ and Goal 3 relates to health and includes a resolution to substantially reduce the number of deaths and illnesses from hazardous chemicals and air, water and soil pollution and contamination by 2020. Actions related to Goal 11 on cities includes a commitment to reduce the adverse per capita environmental impact of cities, including by paying special attention to air quality and municipal and other waste management.

#### European

3.8.3 At the European level, the most relevant PPPs relating to air quality are:

- **European Air Quality Framework Directive (1996) and Air Quality Directive (2008)** - these put in place measures for the avoidance, prevention, and reduction in harmful effects to human health and the environment associated with ambient air pollution and establish legally binding limits for the most common and harmful sources of air pollution. The 2008 Directive sets legally binding limits for concentrations in outdoor air of major air pollutants that impact public health such as particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) and nitrogen dioxide (NO<sub>2</sub>). As well as having direct effects, these pollutants can combine in the atmosphere to form ozone, a harmful air pollutant (and potent greenhouse gas) which can be transported great distances by weather systems<sup>60</sup>;
- **European Industrial Emission Directive (2010)** – which lays down rules on integrated prevention and control of pollution arising from industrial activities. It also lays down rules designed to prevent or, where that is not practicable, to reduce emissions into air, water and land and to prevent the generation of waste, in order to achieve a high level of protection of the environment taken as a whole.

#### National

3.8.4 The 2008 Directive was made law in England through the [Air Quality Standards Regulations 2010](#), which also incorporates the [4th air quality daughter](#)

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<sup>60</sup> <https://uk-air.defra.gov.uk/air-pollution/uk-eu-policy-context>

[directive \(2004/107/EC\)](#) that sets targets for levels in outdoor air of certain toxic heavy metals and polycyclic aromatic hydrocarbons.

3.8.5 The Government set out its plans for dealing with all sources of air pollution, making air healthier to breathe, protecting nature and boosting the economy in the Clean Air Strategy 2019. It complements three other UK government strategies, the Industrial Strategy, Clean Growth Strategy and the 25 Year Environment Plan.

3.8.6 The NPPF states that planning policies and decisions should prevent new and existing development from contributing to or being put at unacceptable risk from, or adversely affected by, unacceptable levels of air pollution. It also states that policies and proposals should accord with EU limit values, accounting for any Air Quality Management Areas (AQMAs) and the cumulative impact of Air Quality as a result of the proposals. The NPPG states that Local Plans need to account for any AQMAs and can use the SA to determine a baseline position from which to work.

3.8.7 The NPPF also requires that:

- Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas;
- Opportunities to improve air quality and mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications; and
- Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.

3.8.8 The 'UK plan for tackling roadside nitrogen dioxide concentrations' was published in July 2017. This is the air quality plan for bringing nitrogen dioxide within statutory limits in the shortest possible time. The plan identifies a range of investment projects to lower the environmental impact of motoring this includes a high level of investments in ultra-low emission vehicles (ULEVs) and related grants aimed at supporting air quality improvements.

3.8.9 The Department for Transport document, The Road to Zero (2018) sets out new measures towards cleaner road transport, aiming to put the UK at the forefront of the design and manufacturing of zero emission vehicles. It explains how cleaner air, a better environment, zero emission vehicles and a strong, clean economy will be achieved. One of the main aims of the document is for all new cars and vans to be effectively zero emission by 2040. The government is currently consulting on whether to bring forward this deadline to 2035.

3.8.10 The following documents are also of relevance, as indicated in Planning Practice Guidance (PPG) :



- the UK Air Information Resource (UK-AIR), which contains information on historic and current air quality across the UK, including a portal of Defra's national assessment against relevant Limit Values and air quality management areas;
- the National Atmospheric Emissions Inventory for emissions of air pollution including maps at a 1km by 1km resolution for a wide range of pollutants;
- the Pollutant and Release Transfer Register, which has links to emissions from installations permitted under the Environmental Permitting Regulations, which is useful for point sources; and
- The Clean Air Strategy which sets out actions for dealing with 5 major sources of air pollution. A detailed National Air Pollution Control Programme was published by the Department for Environment, Food and Rural Affairs in April 2019.

## Local

3.8.11 The Environment Strategy for East Sussex (2020) seeks to protect and enhance the county's natural and built environment for current and future generations including tackling and adapting to climate change. The Strategy identifies air quality as one of its five priority environmental themes, with the key action identified being to develop a Local Cycling and Walking Infrastructure Plan.

3.8.12 The Sussex Air Quality Partnership (Sussex-Air) aims to drive improvements in air quality (and carbon reduction) in Sussex. The partnership is made up of representatives from local authorities in East and West Sussex, the Sussex Health Protection Agency, Sussex Primary Care Trusts, the Environment Agency, the University of Sussex and the University of Brighton. The aim of the partnership is to assist partners to comply with their statutory Local Air Quality Management (LAQM) duties and contribute to improving air quality and health in Sussex. The Business Plan 2019/2020 seeks to deliver a work programme to: improve the local air quality evidence base; improve information and advice to the public; outline DEFRA grant projects; and coordinate partnership communications.

3.8.13 The 5 key objectives of the Partnership, include:

- Providing advice and support and improving expertise and knowledge base;
- Project development and implementation;
- Partnership working;
- Developing cross cutting work on health improvement, climate change, environment and transport; and
- Communicating air quality issues and initiatives in Sussex

3.8.14 The East Sussex County Council Local Transport Plan (2011 to 2026) sets out the County's direction for planning and providing the transport infrastructure and services that are needed to deliver sustainable economic growth and support additional housing in the county during this period. The vision for the plan includes delivering a high quality environment. It recognises that most of the air pollution in the county is generated by road traffic and includes measures that focus on reducing emissions. This includes reducing the need to travel; promotion of different modes of

transport; and supporting local authorities to carry out air quality reviews and the preparation of air quality action plans.

3.8.15 A priority issue for the Eastbourne and South Wealden Area is to improve connectivity and capacity both within the area, and between it and the rest of the South East. The current lack of good strategic connections is seen as inhibiting development and acts as a barrier to creating a more diverse economy that would be more resilient to economic downturns; improvements to the strategic road network would help create economic growth. Integration of housing, employment and social facilities is key in order to reduce the need to travel.

3.8.16 It also recognises that key sections of road and key junctions are under stress from current traffic levels which add to the area's local and strategic connectivity problems. Further pressure from proposed development will exacerbate this. In addition, some parts of Eastbourne and South Wealden suffer from a lack of access to medical facilities which mean people need to travel across the area; achieving a better geographical spread of facilities and filling existing shortfalls in provision would help address this.

3.8.17 For the north of the district, the LTP identifies that the key priorities are:

- retaining and enhancing both Heathfield and Crowborough as service centres for the local community and surrounding settlements thereby reducing the need to travel, through the provision of local sustainable travel option;
- focusing on improvements on safe, coherent walking and cycling routes on key routes/corridors in Crowborough and Heathfield particularly those giving access to the town centre;
- focusing on improvements to public transport on key routes and corridors, especially into and around Crowborough and Heathfield town centre;
- improving access to and modal integration at local rail stations; and
- identifying potential solutions to improve the current public transport links between towns and settlements within the district to support the local economy and reduce rural isolation.

### **Baseline and Trends**

3.8.18 Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. There is also often a strong correlation with equalities issues, because areas with poor air quality are also often the less affluent areas.

3.8.19 The latest Air Quality Report<sup>61</sup> for Wealden identifies that road traffic is the dominant source of air pollution in the area, the major routes being the A22, the A26, the A267, the A259, the A27 and the A272. The main pollutants of concern with respect to road traffic are nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>10</sub> and

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<sup>61</sup> [http://www.sussex-air.net/Reports/AnnualStatusReports/ASR\\_Wealden\\_2018.pdf](http://www.sussex-air.net/Reports/AnnualStatusReports/ASR_Wealden_2018.pdf)

PM2.5). Currently, there are no areas in Wealden where members of the public are exposed to levels of these pollutants in excess of the UK Air Quality Objectives.

3.8.20 Wealden District Council manages local air quality in close collaboration with East Sussex County Council (which contributed to monitoring until 2014) and with the Sussex Air Quality Partnership (Sussex Air). The partnership provides assistance to members and information to the public via its web-site with recent air quality data, news updates, educational resources, links and other services such as airAlert.

3.8.21 In recent years, local monitoring has identified high levels of NO<sub>2</sub> at two roadside locations (A267 East of Cross in Hand, and West of Boship Roundabout), in areas where members of the public are not affected. In March 2017 the A267 East of Cross in hand monitoring location changed due to difficult access and it not being a representative site. The site was moved further down the same road and nearer to residential properties. In 2017, concentrations at the nearest sensitive receptors for both locations achieved the UK air quality objective for annual mean NO<sub>2</sub>, with concentrations lower than 40 µg/m<sup>3</sup>.

3.8.22 Two new locations for monitoring NO<sub>2</sub> were introduced in May 2017 in Forest Row. At the new A22 roadside site, the annualised monitored concentration of NO<sub>2</sub> slightly exceeded the UK air quality objective for annual mean NO<sub>2</sub> (40.6 µg/m<sup>3</sup>), although when distance-corrected for relevant exposure, this fell to below the objective value.

3.8.23 PM<sub>10</sub> and PM<sub>2.5</sub> are not monitored in Wealden District, but data from neighbouring Eastbourne suggest concentrations are consistently low (well below the UK annual mean objectives), decreasing slightly but with significant year-to-year variations. The number of days with high PM<sub>10</sub> concentrations (above the 24-hour objective) has decreased between 2013 and 2017.

3.8.24 O<sub>3</sub> is monitored in two locations in Wealden: Isfield and Lullington Heath. Annual average O<sub>3</sub> levels at Lullington Heath have increased since 2011 but remain below the objective. Levels at Isfield have been stable and have been above the objective except in 2014. The number of days with high ozone concentrations (above the 8-hour objective) has decreased since 2011, with significant year-to-year variability.

3.8.25 Sulphur dioxide (SO<sub>2</sub>) is also measured at the Lullington Heath station. However, in recent years there have been no exceedances of any of the three UK Air Quality Objectives (15-minute, 1-hour and 24-hour).

### **Key Sustainability Issues**

3.8.26 The key issues arising from the review of PPPs and baseline information relating to air quality are:

- Development has the potential to lead to the deterioration in air quality due to increased traffic movements, unless a modal shift away from car use to sustainable transport measures is achieved;

- Technological improvements are likely to have an impact on air quality levels over the long term which will assist the Council's ability to improve air quality, e.g. ultra-low emission vehicles;
- The district suffers from the lack of a comprehensive electric vehicle charging network which, notwithstanding the cost of such vehicles, impedes their take up;
- The district is predominately rural and in some areas lacks a connected public transport network, cycle network and walking infrastructure to facilitate a move away from private cars that would help improve air quality;
- At present the district does not have an Air Quality Management Area (AQMA) nor does it suffer from air quality issues on human health; and
- To prevent the deterioration in air quality, and to assist in reducing emissions relating to climate change, the district's population will need to transform the way it travels and there will need to be a move away from fossil fuels

### **Likely evolution without the Local Plan**

3.8.27 The likely evolution without the Local Plan is:

- Failure to promote more sustainable modes of transport could contribute to a deterioration in air quality levels as a result of increased road traffic from developments (primarily private cars).

### **Possible Local Plan/Policy Approach**

3.8.28 The possible Local Plan/Policy approaches to the key issues are:

- Criteria must be established for when ULEV infrastructure i.e. charging points, is required within development proposals;
- Actions to develop the ULEV charging network across the district must be established, working with neighbouring authorities and other stakeholders;
- The Local Plan and policies should allow for close integration of the priorities within the Wealden District Council Climate Change Plan and Action Plan, where appropriate; and
- The Local Plan and policies should seek a reduction in traffic congestion and encourage sustainable modes of transport in order to reduce air pollution i.e. walking; cycling; public transport.

### **Sustainability Appraisal Objectives**

3.8.29 In order to address these sustainability issues, there should be sustainability appraisal objectives dealing with:

- Reducing carbon emissions;
- Facilitating renewable energy generation and technologies;
- Looking at carbon sinks (sequestration);
- Reduce pollution, improve air quality; and

- Reduce the use and reliance on cars and promote sustainable transport modes (walking, cycling, and public transport).

## 3.9 Waste and Recycling

### Relevant Plans, Policies and Programmes (PPPs)

#### International

3.9.1 At the International level, the most relevant PPPs relating to waste are:

- UN Resolution 2015 Transforming our world: the 2030 Agenda for Sustainable Development (2015)

3.9.2 The Agenda recognises that sustainable urban development and management are crucial to the quality of life of people. It wants to reduce the negative impacts of urban activities and of chemicals which are hazardous to human health and the environment through, amongst other things, the reduction and recycling of waste. It seeks to achieve by 2030 a reduction in the adverse per capita environmental impact of cities, including by paying special attention to air quality and municipal and other waste management and to substantially reduce waste generation through prevention, reduction, recycling and reuse.

#### European

3.9.3 At the European level, the most relevant PPPs relating to waste are:

- **European Landfill Directive (1999)** – which prevents and reduces the negative effects on the environment from the landfilling of waste by introducing stringent technical requirements for waste and landfills;
- **European Waste Framework Directive (2008)** - Sets out the waste hierarchy requiring the reduction of waste production and its harmfulness, the recovery of waste by means of recycling, re-use or reclamation and final disposal that does not harm the environment, including human health; and
- **European Industrial Emission Directive (2010)** - Lays down rules on integrated prevention and control of pollution arising from industrial activities. It also provides regulations designed to prevent or, where that is not practicable, to reduce emissions into air, water and land and to prevent the generation of waste, in order to achieve a high level of protection for the environment.

#### National

3.9.4 A key action of the government's 25 Year Environment Plan (2018) is to increase resource efficiency and reduce pollution and waste. It aims to minimise waste, reuse materials as much as possible and manage materials at the end of their life to minimise the impact on the environment. In order to do this, the Plan sets out the following aims:

- Working towards the ambition of zero avoidable waste by 2050;
- Working to a target of eliminating avoidable plastic waste by end of 2042;

- Meeting all existing waste targets – including those on landfill, reuse and recycling – and developing ambitious new future targets and milestones;
- Seeking to eliminate waste crime and illegal waste sites over the lifetime of this Plan, prioritising those of highest risk. Delivering a substantial reduction in litter and littering behaviour; and
- Significantly reducing and where possible preventing all kinds of marine plastic pollution – in particular material that came originally from land.

3.9.5 The government’s Environment Bill (2020), which is currently going through the Parliamentary process, looks to set new legally binding targets in four priority areas, one of which is waste and resource efficiency. The Bill seeks to help move the economy away from the ‘take, make, use, throw’ system to a more circular economic model. The ambition is to keep resources in use for longer and ensure that the maximum value is extracted from them.

3.9.6 National planning policy in relation to waste and recycling is largely split into two documents, the NPPF (2019) and the National Planning Policy for Waste document that was published in October 2014.

3.9.7 The NPPF (2019) includes as part of the environmental objective for the principle of sustainable development, that development needs to “...*contribute to protecting and enhancing our natural, and historic environment; including... minimising waste and pollution*” (para 8 (c)).

3.9.8 It also requires that strategic policies set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for infrastructure for waste management, as well as ensuring planning policies “...*so far as practicable, take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials, whilst aiming to source minerals supplies indigenously*” (para 204 (b)).

3.9.9 Waste policies are also set out in the National Planning Policy for Waste (October, 2014) that should be read in conjunction with the NPPF (2019). This document sets out the Government’s ambition to work towards a more sustainable and efficient approach to resource use and management and provides a ‘Waste Hierarchy’ for all local authorities to adhere to.

3.9.10 In terms of plan-making, the document outlines how waste planning authorities (in two tier authorities, this would normally be the County Council) should prepare Local Plans which identify sufficient opportunities to meet the identified needs of their area for the management of waste streams. The document also outlines how waste planning authorities identify, in their Local Plans, sites and/or areas for new or enhanced waste management facilities in suitable locations and provides guidance on the determination of planning application for new/enhanced waste facilities.

3.9.11 Lastly, National Planning Practice Guidance does provide some further information in support of the implementation of waste planning policy that should be read in conjunction with the national planning policy documents above.



## Local

3.9.12 The East Sussex Joint Waste Management Strategy (2014-2025) covers local authority collected waste as well as waste from commercial and industrial premises and from construction, demolition and excavation works. Non-local authority collected waste makes up approximately 78% of waste created in the area. The plan's approach is to reduce the amount of waste created and to make sure that there is enough capacity in the future to deal with increases in recycling and recovery of waste. The strategy anticipates that there will not be a need for any more landfill sites in the county (page 5 of the Strategy refers).

3.9.13 The East Sussex Waste and Minerals Plan (adopted in 2013) sets out the strategic policy decisions for waste and minerals in the county. This Plan forms part of the 'Development Plan' covering East Sussex, part of the South Downs National Park and Brighton & Hove. The East Sussex, South Downs and Brighton & Hove Waste and Minerals Sites Plan was adopted in 2017. It highlights industrial sites in which waste related development will be supported highlighting a number of sites within Wealden:

- **SP-A/B Old Factory, West of A22, A271, and A267 Roundabout, Lower Dicker** - comprises a disused two-storey office building with a pitched roof fronting the A22 and a large industrial shed to the rear. Hardstanding within the site provides a yard space. There are also a number of temporary buildings to the western boundary. Due to the small size of site and proximity to sensitive receptors, larger recycling or recovery facilities are unlikely to be suitable;
- **SP-A/C Pumping Station, A271, nr Amberstone Bridge, Hailsham** - consists of a water pumping station and surrounding land. It is located on the northern side of the A271 in Amberstone, a short distance north east of Hailsham. The site comprises a part-single part two-storey modern office building, a two-storey brick built, possibly Victorian era, building with a pitched roof, and a single-storey brick built structure with a flat roof. There is a large area of hardstanding to the east of these buildings which appears to have recently been used to store highways related equipment, such as traffic cones and fencing
- **SP-O/E Maresfield Camp, Maresfield (Ashdown Business Park)** - a former camp site located to the south west of Maresfield, adjacent to Batts Bridge Roundabout, a junction between the A272 and the A22. A household waste recycling centre and the Maresfield Fire Service Training Centre are located adjacently to the west of the site
- **SP-O/H Station Road / Old Swan Lane Industrial Estate, Hailsham** - a mixture of developed, commercial / industrial uses and undeveloped fields. Part of site is an existing waste site named Hailsham HWRS. Part of site identified as adjoining a wastewater treatment works Hailsham South;
- **SP-O/I Station Road Industrial Estate, Hailsham** - The site largely consists of an established industrial estate, although an area / field towards the south-west is undeveloped scrubland, buffering the estate from the Cuckoo Trail cycleway to the west;

- **SP-S/D West Uckfield (Land at), Uckfield** - The site has been identified as a mixed use urban extension, comprising of housing, employment provision, education facilities and associated infrastructure
- **SP-E/A Cophall Wood Waste Transfer Station (Land North of), A22, Polegate** - is an existing waste recycling facility
- **SP-E/B Woodside Depot, A22, Polegate** - Depot is an existing highway / construction depot, mostly comprising of a large hardstanding area. Presently, the operator stores and reuses material generated from their construction business
- **SP-WCA/AP Wealden Worms, Steel Cross, Crowborough** – Safeguarded waste site

3.9.14 The East Sussex Waste and Minerals Plan (2013) is currently being reviewed by East Sussex County Council, the South Downs National Park Authority and Brighton and Hove City Council, following on from the monitoring of the existing plan. Through this process, three areas have been identified which the authorities have considered are in need of review. These include:

- The provision of sand and gravel (aggregates);
- The safeguarding of minerals resources and infrastructure; and
- Improving the effectiveness of specific policies.

3.9.15 The East Sussex Waste and Minerals Plan (2013) also needs to be updated to take account of the new national planning policy that has been published since the plan was adopted. The authorities are currently consulting on a 'Waste and Minerals Local Plan – Draft Revised Policies' document over 12 week period with the document expected to be submitted to the Planning Inspectorate in early 2021.

3.9.16 Wealden District Council is a Waste Collection Authority (WCA) and part of a joint waste collection service with Rother District Council and Hastings Borough Council. The Council is also a partner to the East Sussex Joint Waste Management Strategy, along with Eastbourne Borough Council, Hastings Borough Council, Lewes District Council and Rother District Council. The Strategy, prepared by East Sussex County Council, sets out how waste within the county will be managed up to 2025.

3.9.17 The strategy aims to:

- Reduce the amount of waste produced;
- Increase the amount of waste reused, recycled and composted;
- Reduce the amount of waste landfilled;
- Recover more value from our waste;
- Provide waste services that offer value for money, i.e. that are good and affordable, and are accessible to everyone;
- Review and continuously improve our waste services to ensure they remain environmentally sustainable and affordable; and
- Manage waste as close as possible to its source, ideally within the county.

3.9.18 By 2020 the Strategy will:

- Work to limit the total amount of household waste produced to 995 kg per household per year;
- Recycle and compost 50% of the household waste we produce;
- Reuse 15% of the household waste we produce;
- Recover energy from at least 95% of the household waste that isn't reused, recycled or composted; and
- Divert at least 95% of household waste from landfill.

3.9.19 And by 2025 the Strategy will:

- Recycle and compost 60% of the household waste produced.

### **Baseline and Trends**

3.9.20 The percentage of household waste that is being recycled in Wealden has increased significantly over the past 12 years, with a baseline figure of 28.5% for the 2017/18 year. Total household waste per capita is at 377kg for the year 2017/18, which has decreased by 11.5% since 2007/08.

3.9.21 Whilst the percentage of household waste sent to landfill in the district has increased to 690 tonnes in 2017/18, from a low of 115 tonnes in 2015/16, overall there has been a significant reduction of 98% since 2008/09.

3.9.22 The composting of household waste has also increased with a baseline figure of 24.3% for the 2017/18 year compared to 19.2% for the year 2007/08. But perhaps the most significant trend has been in the percentage of household waste being used in energy recovery, with a baseline figure of 46.1% for the year 2017/18. This compares to just 7.4% in 2007/08.

### **Key Sustainability Issues**

3.9.23 The key issues arising from the review of PPPs and baseline information relating to waste and recycling are:

- Increased development leads to an increase in household waste generation and the potential for a decrease in recycling and composting;
- An increase in development leads to an increase in construction waste and the need for this to be disposed of properly; and
- The district has a very good record of recycling waste but will need to increase recycling rates and provide facilities for dealing with waste locally.

### **Likely evolution without the Local Plan**

3.9.24 The likely evolution without the Local Plan is:

- Significant increased waste generation associated with new development.

### **Possible Local Plan/Policy Approach**

3.9.25 The possible Local Plan/Policy approaches to the key issues are:

- The Local Plan and policies should focus on avoiding waste where possible and promote the sustainable waste management hierarchy and ensure disposal and landfill is the last option considered;
- Ensure that the ESCC Waste Management Strategy is taken into account alongside any locally derived strategies; and
- To safeguard waste sites identified in the adopted Waste and Minerals Sites Plan (2017).

### **Sustainability Appraisal Objectives**

3.9.26 In order to address these sustainability issues, there should be sustainability appraisal objectives dealing with:

- Reducing pollution;
- Reduce the amount of waste; and
- Minimise use of non-renewable resources.

## 3.10 Historic Environment

### Relevant Plans, Policies and Programmes (PPPs)

#### International

3.10.1 At the international level, the following PPPs are relevant to the historic environment:

- **Unesco 1972 Convention Concerning the Protection of the world Cultural and Natural Heritage (the World Heritage Convention)** – this led to the drawing up of the World Heritage List; and
- **UN Resolution 2015 Transforming our world: the 2030 Agenda for Sustainable Development (2015)** – Goal 11 Sustainable cities and communities

3.10.2 Goal 11 of the 2030 Agenda seeks to make cities inclusive, safe, resilient and sustainable and includes as one of its targets “*to strengthen efforts to protect and safeguard the world’s cultural and natural heritage*”.

#### European

3.10.3 At the European level, the following PPPs are relevant to the historic environment:

- **European Convention for the Protection of the Architectural Heritage of Europe (1985)** - requires that the signatories maintain an inventory of it and take statutory measures to ensure protection of architectural heritage. Conservation policies are also required to be integrated into planning systems and other spheres of government influence as per the text of the convention.
- **Valletta Treaty (1992) formerly the European Convention on the Protection of the Archaeological Heritage (Revisited)** - aims to protect the European archaeological heritage “as a source of European collective memory and as an instrument for historical and scientific study”.
- **2005 Framework Convention on the Value of Cultural Heritage for Society**: highlighted the social and economic benefits of preserving cultural heritage as a prerequisite for achieving sustainable development

#### National

3.10.4 The Government’s Statement on the Historic Environment for England 2010 highlights the importance of historic environment and the need to recognise its importance and manage its value in light of the contribution that it can make to social, economic and cultural life. Includes reference to promoting the role of the historic environment within the Government’s response to climate change and the wider sustainable development agenda.

3.10.5 The Heritage Statement (2017) sets out how the Government will support the heritage sector to protect and care for the historic environment, in order to maximise its economic and social impact and to ensure that everyone can enjoy and benefit from it.

3.10.6 Historic England's 'Sustainability Appraisal and Strategic Environmental Assessment' Advice Note (2016) sets out its expectations for the consideration and appraisal of effects on the historic environment as part of the Sustainability Appraisal/Strategic Environmental Assessment process.

3.10.7 The Historic England 'The Historic Environment in Local Plans' Historic Environment Good Practice Advice in Planning: 1, provides information to assist local authorities in implementing historic environment policy in the NPPF and PPG.

3.10.8 As part of sustainable development, the NPPF requires that strategic policies set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for the conservation and enhancement of the natural, built and historic environment. It requires Local Plans to be based on adequate, up-to-date and relevant evidence, (para 31) which would include the historic environment.

3.10.9 The NPPF (2019) advises that Local Plans consider the significance of heritage assets, so that appropriate levels of protection can be afforded. It acknowledges that heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites and that these assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations (para 184).

3.10.10 Paragraph 185 of the NPPF states that:

*"Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats This strategy should take into account:*

- a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;*
- b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*
- c) the desirability of new development making a positive contribution to local character and distinctiveness; and*
- d) opportunities to draw on the contribution made by the historic environment to the character of a place".*

3.10.11 In considering the designations of Conservation Areas, the NPPF states that local planning authorities "...should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest" (para 186). It also requires that local planning authorities maintain or should have access to a historic environment record and that this should contain up-to-date evidence about the historic environment in their area. The record should be used for assessing the significance of heritage assets and the contribution they make to their

environment and to predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.

### **Baseline and Trends**

3.10.12 The East Sussex Historic Environment Record (ESHER) presently records a total of around 11,500 designated and non-designated heritage assets within Wealden District. Of this total, some 2370 (20%) are designated, but around 9130 (80%) are non-designated. It is likely that some of the non-designated heritage assets are of national or regional importance.

3.10.13 Wealden has 41 designated Conservation Areas<sup>62</sup>, 33 of which are within the jurisdiction of Wealden District Council and 8 of which are located within the part of the district that falls within the management of the South Downs National Park Authority, who plan for their own area.

3.10.14 The Council is presently drafting Character Appraisal Documents and an over-arching Management Plan for the 33 Conservation Areas within the District. The Character Appraisal Documents will articulate the special interest and character of each of the Conservation Areas to help inform planning decisions.

3.10.15 The importance of the historic environment of the district is also reflected in the number of protected heritage assets it has. Within the district, including that part within the South Downs National Park, there are over 2,200 listed buildings designated as being of special architectural or historic interest and 105 scheduled monuments.

3.10.16 Historic England's [Register of Historic Parks and Gardens of Special Historic Interest in England](#) was established in 1983. On the register there are 20 entries within Wealden District. These sites are not open to the public unless advertised as so.

3.10.17 The heritage assets in Wealden which are at risk of being lost, due to decay, neglect or inappropriate development are<sup>63</sup>:

- Parish Church of St Andrew, The Tye, Alfriston (Grade I Listed);
- Parish Church of All Saints, Waldron, Heathfield and Waldron (Grade I Listed);
- High Rocks Camp (see also Wealden, East Sussex), Frant (Scheduled Ancient Monument); and
- Kidbrooke Park, Forest Row (Grade II Historic Park & Garden).

3.10.18 Wealden's rich history is also reflected in the number of sites of archaeological interest in the District. Sites where there are recorded archaeological

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<sup>62</sup> Further information on the Districts Conservation Areas and Conservation Area Character Appraisals: <https://www.wealden.gov.uk/planning-and-building-control/heritage/conservation-areas/>

<sup>63</sup> Historic England Heritage at Risk Register. Available at: <https://historicengland.org.uk/advice/heritage-at-risk/search-register/results/?searchType=HAR&search=Wealden>



remains are designated as Archaeological Notification Areas (ANAs). Detail of these sites are held by East Sussex County Council Archaeology Team.<sup>64</sup>

### **Key Sustainability Issues**

3.10.19 The key issues arising from the review of PPPs and baseline information relating to the historic environment are:

- Several heritage assets within Wealden are on Historic England's Heritage at Risk Register, which present conservation issues;
- Development has the potential to impact on heritage assets, although there are opportunities for enhancement through sensitive design and consideration of opportunities for new development within conservation areas and within the setting of heritage assets to enhance or better reveal their significance;;
- Short-term visions for the development and demand for new housing and other needs could result in inappropriate development and demolition, which could affect the character of historic areas/buildings within the district;
- Potential loss or harm caused to the setting of heritage assets as a result of development; and
- Potentially, the loss of character to heritage assets by incremental change is the biggest pressure.

### **Likely evolution without the Local Plan**

3.10.20 The likely evolution without the Local Plan is:

- Sites, areas and buildings that have not been formally designated, such as those on a local list, will have limited protection against inappropriate development.

### **Possible Local Plan/Policy Approach**

3.10.21 The possible Local Plan/Policy approaches to the key issues are:

- The Local Plan and policies must continue protecting, and wherever possible sustaining, enhancing and better revealing the significance of the district's rich historic environment, including designated and non-designated heritage assets, through new development making a positive contribution to local character and distinctiveness;
- As and when opportunities arise, the Local Plan should support and encourage the reduction of the number of sites on the Heritage at Risk Register;
- Policies should protect and promote a high quality environment. Ensure that development needed for economic or social needs does not adversely affect the character of the district and should reflect the character of place created by the historic environment whilst recognising the positive contribution that

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<sup>64</sup> Further information on the District ANAs see <https://www.eastsussex.gov.uk/environment/archaeology/planning>

conservation of heritage assets can make to sustainable communities including their economic vitality;

- The Local Plan and policies must take account of the Conservation Area Character Appraisals; and
- Local Plan policy should set policies to preserve and record archaeological remains and to enhance the East Sussex Heritage Environment Record.

### **Sustainability Appraisal Objectives**

3.10.22 In order to address these sustainability issues, there should be sustainability appraisal objectives dealing with:

- Conserving and enhancing the historic environment and heritage assets;
- Making the best use of existing buildings;
- Climate change; and
- Improving the quality of the built environment.

## 3.11 Population

### Relevant Plans, Policies and Programmes (PPPs)

3.11.1 Overall there are no specific individual PPPs that relate purely to the issue of population and planning. Rather, the PPPs listed in Appendix A and under other topic areas in this Chapter all have a bearing on the population as they seek to maximise the beneficial effects of development on people whilst balancing this with impacts on climate change, the environment, the economy and communities. Having said this, some PPPs with most relevance are identified below.

#### International

3.11.2 At the international level, the following PPPs have relevance to population:

- UN Resolution 2015 Transforming our world: the 2030 Agenda for Sustainable Development (2015);
- United Nations Convention on Access to Information, Public Participation in Decision- Making and Access to Justice in Environmental Matters (1998);
- UN Paris Climate Change Agreement (2016); and
- Kyoto Protocol on Climate Change, United Nations, 1997

3.11.3 The 2030 Agenda for Sustainable Development (2015) has at its heart a universal call to action to end poverty, protect the planet and improve the lives and prospects of everyone. The 17 Goals it sets out, and which were adopted by all UN Members in 2015 as part of the 15 year plan to achieve them, includes Goal 3 which incorporates various health issues ranging from road-traffic accidents to reducing the numbers of deaths and illnesses from hazardous chemicals and air, water and soil pollution and contamination.

3.11.4 The UN Convention (1998) establishes certain rights of the public with regard to the environment. The Parties to the Convention are required to make provisions for these rights to become effective.

3.11.5 The PPPs related to climate change are fundamentally connected to population and people as this is perhaps the biggest threat to society that we will face.

#### European

3.11.6 At the European level, the following PPPs have most relevance to population:

- **European Environmental Noise Directive (2002)** - Sets out a hierarchy for the avoidance, prevention and reduction in adverse effects associated with environmental noise, including noise generated by road and rail vehicles, infrastructure, aircraft and outdoor, industrial and mobile machinery.

- **European Air Quality Framework Directive (1996) and Air Quality Directive (2008)** - Puts in place measures for the avoidance, prevention, and reduction in harmful effects to human health associated with ambient air pollution and establishes legally binding limits for the most common and harmful sources of air pollution; and
- **European Floods Directive (2007)** – Provides a framework for the assessment and management of flood risk, aiming at the reduction of the adverse consequences for human health, amongst other concerns.

### National

3.11.7 At the national level, the suite of legislation that applies to the development sector will have an overall effect on population as it is seeking to plan for sustainable growth to benefit people and communities.

3.11.8 The Climate Change Act (2008) and associated climate change PPPs set legally binding targets for reducing emissions, and now have the aim of the UK being net zero (or carbon neutral) by 2050. This will both impact on people's lives, in terms of the ways in which we travel, where development is located and the transport infrastructure we develop, and seek to improve them through ensuring the most adverse effects of climate change are either halted or as is likely mitigated and adapted to.

3.11.9 The Governments 25 Year Environment Plan (2018) and the Environment Bill (2020) have much the same effect in that they are aimed at improving the natural and built environment to the benefit not only of wildlife and biodiversity but also of people. The 25 Year Environment Plan sets the following overall goals, which will all work together to improve people's lives through improving the environment and ensuring the sustainable use of resources:

1. Clean air;
2. Clean and plentiful water;
3. Thriving plants and wildlife;
4. A reduced risk of harm from environmental hazards such as flooding and drought;
5. Using resources from nature more sustainably and efficiently;
6. Enhanced beauty, heritage and engagement with the natural environment;
7. Mitigating and adapting to climate change;
8. Minimising waste;
9. Managing exposure to chemicals; and
10. Enhancing biosecurity.

3.11.10 The Government set out its plans for making air healthier to breathe, protecting nature and boosting the economy, by dealing with all sources of air pollution, in the Clean Air Strategy 2019. It complements the government's Industrial Strategy, Clean Growth Strategy as well as the 25 Year Environment Plan. The Industrial Strategy sets out how the government will boost productivity across the UK through five foundations – ideas, people, infrastructure, business, environment, and places. The Clean Growth Strategy sets out the UK's reaffirmed ambition to promote the ambitious economic and environmental policies to mitigate climate change and

deliver clean, green growth – all of which will have beneficial effects on people and the population.

3.11.11 The Public Health England (PHE) Strategy 2020 to 2025 sets out how PHE will work to protect and improve the public's health and reduce health inequalities over the next 5 years.

3.11.12 The Government set out in its Housing White Paper (Fixing our Broken Housing Market) published in February 2017, its plans to reform the housing market and boost the supply of new homes in England, in order to keep up with population growth and address the historic under-supply of homes. A number of the proposed reforms within the White Paper have been translated into the NPPF (2019).

3.11.13 As already stated, PPPs are not necessarily specific to population but rather their aims and objectives/goals are seeking to maximise positive and minimise negative effects on people. The NPPF as a whole is seeking to enable sustainable development to meet the needs of the population whilst also balancing the needs of the environment and economy.

3.11.14 The NPPF does seek to support the Government's objective of significantly boosting the supply of homes and recognises it is important that a sufficient amount and variety of land can come forward where it is needed, that needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

3.11.15 In addition, the NPPF requires that strategic policies in a Local Plan are informed by a local housing needs assessment to determine the minimum number of homes needed, using the standard methodology (unless exceptional circumstances justify an alternative approach), and ensuring that the size, type and tenure of housing needed for different groups in the community is considered and reflected in housing policies. This includes an assessment of the need for affordable housing as well as undertaking a review of its strategic housing and economic land availability assessment in order to have a clear understanding of the land available in its area.

3.11.16 The NPPF also recognises that rural areas may have different issues/needs when it comes to housing and states that in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this. To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.

3.11.17 It is not just housing within the NPPF that will have a bearing on the population and people's lives. The NPPF also has policies to build a strong and competitive economy (including supporting a prosperous rural economy); to ensure the vitality of town centres; to promote healthy and safe communities (including provision of open space and recreation); promoting sustainable transport, including infrastructure for walking and cycling; supporting high quality communications

networks; achieving well designed places for people to live and work; meeting the challenge of climate change including flood risk and conserving and enhancing the natural and historic environment.

## Local

3.11.18 At the local level, PPPs are also not necessarily population specific, but as with the NPPF they work together to maximise positive and minimise negative effects. The Council will be undertaking a housing needs assessment, that includes affordable housing and older people's housing, as well as other evidence base work on the economy, the environment, open space and recreation provision to name a few. This will ensure that the planning strategy will be the most appropriate and sustainable for the district.

3.11.19 Key to this will be the consideration of the Climate Change Action Plan that the Council developed within any strategies or policies that are taken forward as ultimately society cannot thrive unless the impacts and causes of climate change are addressed in some form.

3.11.20 The aims of the Council's Corporate Plan 2019 – 2023 will also be key as these seek to:

- Protect and enhance Wealden's high quality natural environment and heritage;
- Promote a better quality of life for Wealden people through activities that improve health, resilience and well-being;
- Improve access to essential services for all our communities;
- Ensure development meets future needs, with associated investment in infrastructure;
- Take advantage of opportunities to promote new, cleaner technologies;
- Work with partners to regenerate our diverse market towns, creating jobs and attracting investment;
- Support our local businesses and entrepreneurs to achieve a locally sustainable economy; and
- Generate ongoing sources of income to reinvest in local priorities and optimise funding from external sources.

## **Baseline and Trends**

### Population

3.11.21 The estimated resident population of Wealden in 2018 was 160,175, rising from 141,150 in 2002, an increase of 13.5%<sup>65</sup>. It is expected to rise to 192,312 in 2033<sup>66</sup> an increase of just over 20%.

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<sup>65</sup> Office for National Statistics (ONS), Mid-year Population Estimates. Population estimates, 2001-2018 – districts. Available at: [www.eastsussexinfofigures.org.uk](http://www.eastsussexinfofigures.org.uk)

<sup>66</sup>ESCC (April 2020). Population projections by age and gender (dwelling-led), 2018-2033 – districts. Available at: [www.eastsussexinfofigures.org](http://www.eastsussexinfofigures.org)



3.11.22 The age structure of the district shows a significant proportion of the population are over 65 years old, with a baseline figure of 26.5% in 2020 and that this figure is projected to rise to 31.8% by 2033. Conversely, there is projected to be a decrease in 18-64 years olds over the same time period from 54.2% in 2020 to 50.1% in 2033 and in 0-17 year olds from 19.3% in 2020 to 18.1% in 2033<sup>67</sup>.

3.11.23 When compared to the national and regional pictures, the Census reveals that Wealden District has a significantly higher percentage of the population in the over 65 age group. This mirrors the population projections and indicates that Wealden District is an attractive place to live for older people, whilst the relative affluence can mean it is difficult for younger people to move in or stay.

3.11.24 The district has a net outflow of younger people (15-24) in 2019, although this has improved over the last 10 years. This may reflect that many younger people are moving to higher education provided outside of the district (there is no university in the district) or that the affluence of the district makes it difficult for younger people to stay (i.e. difficulties in being able to get on the property ladder, accessing well paid jobs etc.). There is also a net inflow of those aged 25-44 highlighting that the district is attractive for families with children perhaps.

	2009	2019
0-14	349	481
15-24	-547	-362
25-44	149	662
45-64	140	586
65+	36	75

**Table 7: Internal migration by age group - Wealden<sup>68</sup>**

3.11.25 The majority of the districts population live in urban areas, with the split being 55% urban to 45% rural residents. However the age profile of urban and rural areas is relatively similar (see Table 8).

Age group	Urban (%)	Rural (%)
0-15	18.2	17.2
16-64	59.2	59.4
65+	22.6	23.4
Total	100	100

**Table 8: Population by urban and rural areas in 2011<sup>69</sup>**

### Indices of Multiple Deprivation

3.11.26 Relative deprivation is an aspect of population. The Index of Multiple Deprivation (IMD) 2019 is the official measure of relative deprivation for small areas (or neighbourhoods) in England. The IMD ranks every small area (Lower Super

<sup>67</sup> ESCC (April 2020) Population projections by age and gender (dwelling-led), 2018-2033 – districts. Available at: [www.eastsussexinfofigures.org](http://www.eastsussexinfofigures.org)

<sup>68</sup> Office for National Statistics (ONS) Internal migration by age group, 2002-2019) – districts. Available at: [www.eastsussexinfofigures.org.uk](http://www.eastsussexinfofigures.org.uk)

<sup>69</sup> Office for National Statistics (ONS), KS102EW. Population by urban and rural areas in 2011 – parishes. Available at: [www.eastsussexinfofigures.org.uk](http://www.eastsussexinfofigures.org.uk)

Output Area) in England from 1 (most deprived) to 32,844 (least deprived). For larger areas we can look at the proportion of LSOAs within the area that lie within each decile. Decile 1 represents the most deprived 10% of LSOAs in England while decile 10 shows the least deprived 10% of LSOAs.

3.11.27 The number of LSOAs within the most deprived 10% nationally has improved slightly, from 200 in 2015<sup>70</sup> to 195 in 2019.<sup>71</sup> Using the IMD rank of average summary measure, Wealden ranks 254 in 2019, out of 317 local authorities, which indicates a low level of deprivation. However, this apparent relative lack of deprivation within the district hides a more complex picture.

3.11.28 The percentage of households within the district living in fuel poverty was 8.3% in 2017. This means that 8.3% of households in Wealden in 2017 find it difficult to afford sufficient fuel to maintain a satisfactory heating regime<sup>72</sup>.

3.11.29 The percentage of children living in low income families (used to be known as children in poverty) in the district has not improved. In 2014/15, 10.9% of children lived in low income households and in 2018/19 this has risen to 13.9%<sup>73</sup>.

## Disability

3.11.30 Data shows that 17.5% of the district's population has a limiting long term illness, health problem or disability which limits their daily activities or the work they can do (includes problems that are due to old age)<sup>74</sup>.

3.11.31 Data for limiting long-term illness<sup>75</sup> and disability<sup>76</sup> shows that in 2032 in Wealden there will be around 40,192 people (a rate of 21.3 persons per 100) with a limiting long term illness and 36,531 people (a rate of 20.9 persons per 100) with a disability, which could limit their daily activities or the work they could do. For East Sussex as a whole, the figures stand at 23.7 persons per 100 people with a limiting long term illness and 23 persons per 100 with a disability.

3.11.32 The projected increase of the population in Wealden having a limiting long-term illness from 2017 – 2032 is 27%. The projected increase for those with a disability is 30.8%. These projected rises will need to be accounted for in the types of services, facilities and developments that come forward through the Local Plan, particularly in terms of new accommodation provided.

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<sup>70</sup> Department for Communities and Local Government (DCLG), Indices of Deprivation, 2015 (constructed by Oxford Consultants for Social Inclusion (OCSI). Available at: [www.eastsussexinfofigures.org.uk](http://www.eastsussexinfofigures.org.uk)

<sup>71</sup> Ministry of Housing, Communities and Local Government (MHCLG), Indices of Deprivation, 2019 (constructed by Oxford Consultants for Social Inclusion (OCSI). Available at: [www.eastsussexinfofigures.org.uk](http://www.eastsussexinfofigures.org.uk)

<sup>72</sup> Department for Business, Energy & Industrial Strategy (BEIS). Households in fuel poverty, 2008-2017 - super output areas. Available at: [www.eastsussexinfofigures.org.uk](http://www.eastsussexinfofigures.org.uk)

<sup>73</sup> Department for Work and Pensions (DWP), via the StatXplore website. Children in low income families 2014-2019 - super output areas. Available at: [www.eastsussexinfofigures.org.uk](http://www.eastsussexinfofigures.org.uk)

<sup>74</sup> Office for National Statistics (ONS), KS301. Residents with limiting long-term illness in 2011 – parishes. Available at: [www.eastsussexinfofigures.org.uk](http://www.eastsussexinfofigures.org.uk)

<sup>75</sup> East Sussex County Council Research and Information Team (May 2019). Limiting long-term illness projections (dwelling-led), 2017-2032 – districts. Available at [www.eastsussexinfofigures.org.uk](http://www.eastsussexinfofigures.org.uk)

<sup>76</sup> East Sussex County Council Research and Information Team (May 2019). Disability projections (dwelling-led), 2017-2032 – districts. Available at [www.eastsussexinfofigures.org.uk](http://www.eastsussexinfofigures.org.uk)

3.11.33 The percentage of the working population (those aged 16-64) who are economically inactive in the district stands at 38.8% and of those, 6.5% were inactive due to long term sickness or disability. The England and Wales average for this category is 10.7%; for the South East it is 7.9%; and for East Sussex it is 9.1%<sup>77</sup>.

### **Key Sustainability Issues**

3.11.34 The key issues arising from the review of PPPs and baseline information relating to the population are:

- The district has an ageing population and a net out-migration of younger people which has the potential to affect areas such as housing provision as well as the economy and service provision i.e. health care;
- The proportion of the district's population living with a long term illness or a disability is projected to increase by 2032 which again has implications for housing provision i.e. homes suitable for adaptation to the life stage of the occupant(s) as well as health care provision; and
- The percentage of children living in low income families in the district has not improved.

### **The Likely Evolution without the Local Plan**

3.11.35 The likely evolution without the Local Plan is:

- Potential for out-migration of young people to continue due to a lack of affordable homes and the availability of suitable employment;
- Potential for a lack of adequate services and facilities for elderly and young people;
- Deprivation levels may continue to worsen for certain areas of the district due to a lack of appropriate and adequate housing and employment opportunities and a healthy environment;
- The proportion of the population with a limiting long term illness or disability continues to increase and facilities or services are not provided to support them;
- Lack of health facilities and services to assist those with long term illnesses or disabilities; and
- Lack of adaptable housing provided to meet needs of an ageing population and those with disabilities.

### **Possible Local Plan/Policy Approach to sustainability issues**

3.11.36 The possible Local Plan/Policy approaches to the sustainability issues are:

- The Local Plan should ensure that there is access to essential facilities for those with a disability and/or long term illness;

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<sup>77</sup> Office for National Statistics (ONS), DC6301EW. Economic activity by general health and provision of unpaid care in 2011 – districts. Available at: [www.eastsussexinfigures.org.uk](http://www.eastsussexinfigures.org.uk)

- The Local Plan and policies should look at increasing health service provision to meet requirements for older age groups and those with disabilities or limiting long term illnesses;
- Policies relating to housing provision should ensure that they account for the need for homes to be adaptable to the different life stages of occupants i.e. as people get older;
- Ensure, where necessary and appropriate, that enough local health care facilities are provided as part of new development and that there is comprehensive transport to health centres and facilities throughout the district;
- The Local Plan should address issues of social exclusion and accessibility for disadvantaged groups and ensure that social and economic sustainability objectives are taken fully into consideration in key wards; and
- The Local Plan should investigate why there is a net out-migration of younger people to see if the causes can be addressed i.e. affordability of housing, provision of job opportunities, education provision etc.

### **Sustainability Appraisal Objectives**

3.11.37 In order to address these sustainability issues, there should be sustainability appraisal objectives dealing with:

- Providing good quality, affordable homes;
- Creating healthy, safe and inclusive communities/environments;
- Climate change impacts; and
- Access to facilities and services.

## 3.12 Social Care

### **Relevant Plans, Policies and Programmes (PPPs)**

#### International

3.12.1 At the international level, the following PPPs have relevance to social aspects of life:

- UN Resolution 2015 Transforming our world: the 2030 Agenda for Sustainable Development (2015); and
- World Health Organisation (WHO) – Age Friendly Communities

3.12.2 The 2030 Agenda for Sustainable Development (2015) has at its heart a universal call to action to end poverty, protect the planet and improve the lives and prospects of everyone. As part of the Agenda's vision, it seeks to create a world with equitable and universal access to health care and social protection where physical, mental and social well-being are assured. Many of the Goals set out in the 2030 Agenda relate to social care aspects including Goal 1 'No poverty'; Goal 3 'Good Health and wellbeing' and Goal 11 'Sustainable cities and communities'.

3.12.3 The WHO Global Network for Age-friendly Cities and Communities (the Network) was established to foster the exchange of experience and mutual learning between cities and communities worldwide. Cities and communities in the Network are of different sizes and are located in different parts of the world. Their efforts to become more age-friendly take place within very diverse cultural and socio-economic contexts. What all members of the Network do have in common is the desire and commitment to promote healthy and active ageing and a good quality of life for their older residents.

#### European

3.12.4 At the European level there are no specific PPPs related to social care although many of the PPPs listed in Appendix A and under other sub topics in this Chapter have social aspects embedded within them or have indirect linkages such as the impact of European PPPs on climate change which will have societal benefits.

#### National

3.12.5 Social care provisions in legislation<sup>78</sup> include social work, personal care, protection or social support services for children or adults in need or at risk; including those with needs arising from illness, disability, old age or poverty.

3.12.6 The aims of social care provision are:

- To protect the people who use the care services from abuse or neglect;
- To prevent deterioration of or promote physical or mental health;

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<sup>78</sup> The primary legal definitions for social care in England originates from the National Health Service and Community Care Act 1990

- To promote independence and social inclusion;
- To improve opportunities and life chances;
- To strengthen families; and
- To protect human rights in relation to peoples' social needs.

3.12.7 The emphasis on moving towards a more individualised approach to addressing the needs of older people is underlined in the document 'Putting People First'. This ministerial document establishes the collaboration between central and local government, the sector's professional leadership, providers and the regulator. It sets out the shared aims and values which will guide the transformation of Adult Social care, and recognises that the sector will work across agendas with users and carers to transform people's experience of local support and services. The intention is to move away from the paternalistic, 'one size fits all approach' that has characterised the delivery of some social care services in recent years and to put the user (and carer) firmly in the centre, choosing and guiding their care and support according to pre-agreed outcomes.

3.12.8 This approach builds on earlier studies, such as 'All Our Tomorrows: Inverting the Triangle of Care'<sup>79</sup>. This describes a shift away from a focus on acute care and the frailest older people to a more preventative approach. The concept of a triangle of care is used to depict how most resources currently go to the few. This triangle needs to be inverted, putting community engagement and the promotion of wellbeing at the top in terms of both importance and resources. The extension of universal services for all older people should be crucial to all agencies. Individuals would benefit from this approach as well as the health and social care economy as a whole (through reduced pressure on services) and the local community (becoming sustainable and retaining its diversity and history).

3.12.9 The NPPF (2019) does not contain any explicit requirements in terms of social care provision, rather it incorporates any measures or actions into policy areas dealing with health and wellbeing overall as well as housing and communities. However, some extracts that could be applied to the social care arena are provided below:

- *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 (para 8b);*
- *Planning policies and decisions should aim to achieve healthy, inclusive and safe places which... enable and support healthy lifestyles, especially where this would address identified local health and well-being needs (para 91c);*
- *To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should... plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public*

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<sup>79</sup> All Our Tomorrows: Inverting the Triangle of Care Association of Directors of Social Services October 2003

*houses and places of worship) and other local services to enhance the sustainability of communities and residential environments (para 92a);*

- *To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should... take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community (para 92b); and*
- *Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to... older people, people with disabilities... (para 61).*

## Local

3.12.10 The Council's Corporate Plan 2019-2023 contains a number of aims and objectives that are related to social care including supporting initiatives to address changing health needs across the District, with work on dementia and social isolation as well as seeking to meet local needs in the housing market including for those older people seeking to downsize. These issues will be assessed as part of the Council's forthcoming housing needs assessment in support of the new Local Plan.

3.12.11 The Wealden Older Persons Housing and Support Strategy 2008-2028 has been produced in partnership with East Sussex County Council and a number of other key stakeholders to specifically address issues relating to older persons housing and support.

3.12.12 The strategy aims: 'To enhance the social inclusion, dignity, choice and independence of older people living in Wealden District Council, by maintaining people in their own homes and through the provision of a range of housing and housing related support services'.

3.12.13 Wealden District Council has also undertaken its own Housing Strategy (2017 – 2020) that concentrates on increasing housing supply, improving housing quality and providing advice to support individuals and communities within Wealden District that require new homes/accommodation. This includes a commentary on the delivery of new accommodation for older people and those in social care.

3.12.14 In 2019 there were 15,526 patients on the dementia register in Wealden. Pevensey & Westham had the highest rate of depression for all East Sussex wards and districts (138 per 1,000 population)<sup>80</sup>. According to the Wealden District Local Needs and Assets Profile (2017)<sup>81</sup> High Weald Lewes Havens CCG and Eastbourne Hailsham and Seaford CCG have significantly higher incidence and prevalence of depression compared to England.

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<sup>80</sup> Source: Freedom Leisure Scoping Paper 2019. Provided by Wealden Community and Regeneration Officers (April 2020)

<sup>81</sup> <http://www.eastsussexjsna.org.uk/JsnaSiteAspx/media/jsna-media/documents/overviews/2017%20LNAP/LNP-Wealden-District-2017.pdf>



3.12.15 The Council's intention is to support people's wellbeing and their independence in their own homes; preventing, reducing and delaying the need for mainstream services.

### **Baseline and Trends**

#### **Provision of services and support to elderly**

3.12.16 In 2008/09, only 30.7% of respondents to the Annual Place Survey in Wealden thought older people in their local area are able to access the services and support they needed to continue to live in their own home<sup>82</sup>. However, over half of the respondents said they did not know, so the results may be skewed to some degree.

#### **Provision of unpaid care**

3.12.17 Since the 2001 Census, the number of people providing unpaid care in Wealden has increased by 16.3%, whilst the population within the district increased by 6.4%. The largest proportional increase in unpaid care is amongst those people providing 20-49 hours per week (55.6% increase since 2001) and those providing over 50 hours per week (27.7% increase since 2001)<sup>83</sup>. This reflects the trends of an ageing population profile in the district as well as the increase in numbers of people with disabilities or long term illnesses.

#### **Care Homes**

3.12.18 In terms of other forms of social care provision, of the total number of residents in communal establishments<sup>84</sup> in Wealden in 2011, just over 20% were in a care home with nursing provision whilst just over 37% were in a care home without nursing provision. These were private care establishments<sup>85</sup>. Within Local Authority care homes in 2011, only 0.5% of the total residents were accommodated.

### **Key Sustainability Issues**

3.12.19 The key issues arising from the review of PPPs and baseline information relating to social care are:

- There are a relatively high proportion of residents in some form of care home, either with or without nursing provision, and given the ageing population this could likely increase;
- There may be pressure on care home facilities in the future given the ageing population of the district;

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<sup>82</sup> Ipsos MORI for East Sussex County Council. (Mid-2009). Provision of services and support to elderly, 2008/09 – districts. Available at: [www.eastsussexinfo.org.uk](http://www.eastsussexinfo.org.uk)

<sup>83</sup> Office for National Statistics (ONS), KS301. Provision of unpaid care in 2011 - parishes. Available at: [www.eastsussexinfo.org.uk](http://www.eastsussexinfo.org.uk)

<sup>84</sup> A communal establishment is an establishment providing managed residential accommodation. 'Managed' in this context means full-time or part-time supervision of the accommodation

<sup>85</sup> Office for National Statistics (ONS), KS405. Residents in communal establishments by type in 2011 – parishes. Available at: [www.eastsussexinfo.org.uk](http://www.eastsussexinfo.org.uk)

- The Council is focused on improving the lives of older people through the Older Persons Housing and Support Strategy 2008-2028;
- Increasing overall population and an increasingly elderly demographic profile will place increased demands on health and social support services, as well as housing; and
- Potential lack of care facilities development within the district.

### **Likely evolution without the Local Plan**

3.12.20 The likely evolution without the Local Plan is:

- Failure to provide adequate social and care facilities for the districts ageing population;
- A failure to provide adequate social and care facilities would mean potentially more pressure will be generated for unpaid care givers who may/could otherwise be economically active; and

### **Possible Local Plan/Policy Approach to sustainability issues**

3.12.21 The possible Local Plan/Policy approaches to the sustainability issues are:

- Policies should look at providing housing mix to accommodate the changing age profile of the district, ensuring suitable housing adaptability where possible and financially viable;
- Ensure that enough social care facilities are provided as part of new development; and
- The Local Plan should incorporate the aims and objectives of the Older Persons Housing and Support Strategy 2008-2028, or any amended local strategy.

### **Sustainability Appraisal Objectives**

3.12.22 In order to address these sustainability issues, there should be sustainability appraisal objectives dealing with:

- Providing good quality, affordable homes including those suitable for an ageing population;
- Creating healthy, safe and inclusive communities/environments;
- Climate change impacts; and
- Access to facilities and services.

## 3.13 Housing

### Relevant Plans, Policies and Programmes (PPPs)

#### International

3.13.1 At the international level, the following PPPs have relevance to housing:

- UN Resolution 2015 Transforming our world: the 2030 Agenda for Sustainable Development (2015);
- UN Paris Climate Change Agreement (2016); and
- Kyoto Protocol on Climate Change, United Nations, 1997.

3.13.2 The 2030 Agenda for Sustainable Development (2015) has at its heart a universal call to action to end poverty, protect the planet and improve the lives and prospects of everyone. The 17 goals it sets out, and which were adopted by all UN Members in 2015 as part of the 15 year plan to achieve them, includes Goal 11 'Make cities and human settlements inclusive, safe, resilient and sustainable' which has as one of its aims:

*"By 2030, ensure access for all to adequate, safe, and affordable housing..."*<sup>86</sup>

3.13.3 The PPPs related to climate change are fundamentally connected to housing as they seek to reduce greenhouse gas emissions, which include those from domestic buildings.

#### European

3.13.4 At the European level, the following PPPs are relevant to housing:

- **European Energy Performance of Buildings Directive (2010) and the Energy Efficiency Directive (2012)** – These pieces of legislation establish the framework for boosting the energy performance of buildings, which will help to achieve a highly efficient and decarbonised building stock by 2050, leading to a reduction in carbon emissions;
- **European Floods Directive (2007)** – Provides a framework for the assessment and management of flood risk, aiming at the reduction of the adverse consequences for human health, the environment, cultural heritage and economic activity; and
- **Charter of Fundamental Rights of the European Union (2000/C364/01)** – Article 34 is devoted to social security and social assistance. Paragraph 3 reads *"In order to combat social exclusion and poverty, the Union recognises and respects the right to social and housing assistance so as to ensure a decent existence for all those who lack sufficient resources, in accordance with the rules laid down by Community law and national laws and practices"*.

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<sup>86</sup> Goal 11.1

<https://sustainabledevelopment.un.org/content/documents/21252030%20Agenda%20for%20Sustainable%20Development%20web.pdf>

## National

3.13.5 The Climate Change Act (2008) requires that emissions of carbon dioxide and other greenhouse gases are reduced and that climate change risks are prepared for. The Act also establishes the framework to deliver on these requirements. Through the Climate Change Act, the UK government has set a target to significantly reduce UK greenhouse gas emissions by 2050 and a path to get there.

3.13.6 This will include measures to reduce emissions from the housing sector through the design of new builds and energy efficiency, as well as the potential retrofitting of existing housing stock.

3.13.7 The Flood Risk Management Act (2010) also has relevance to housing as it aims to reduce the flood risk associated with extreme weather events whilst also providing for better, more comprehensive management of flood risk for people, homes and businesses. Flood risk needs to be taken into account at the earliest stages of plan-making and development proposals.

3.13.8 The Government set out in its Housing White Paper (Fixing our Broken Housing Market) published in February 2017, its plans to reform the housing market and boost the supply of new homes in England. This report confirms that since the 1970s, there has been on average 160,000 new homes each year in England and that the consensus is that we need from 225,000 to 275,000 or more homes per year to keep up with population growth and start to tackle years of under-supply. The Government's target has since risen to 300,000 additional homes in England per year by the mid-2020s. A number of the proposed reforms within the Government's Housing White Paper have been translated into the NPPF (2019).

3.13.9 One of the areas to have the biggest impact on housing is the Building Regulations, which have been tightened in recent times. The Future Homes Standard: changes to Part L and Part F of Building Regulations for new dwellings provides proposed options to increase the energy efficiency requirements for new homes in 2020. The Future Homes Standard will require new build homes to be future-proofed with low carbon heating and world-leading levels of energy efficiency which will be introduced by 2025. There are also requirements for strict water efficiency measures, space standards and adaptability of homes amongst others.

3.13.10 The above, and some other requirements of PPPs listed in Appendix A, are incorporated into the NPPF (2019) in terms of housing. At the heart of the NPPF is the presumption in favour of sustainable development which states as one of its requirements that:

*“For plan-making this means that...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*” (para 11b)

3.13.11 The general approach that the NPPF requires local plans and policies to take in relation to housing is that they should set out an overall strategy for the pattern, scale and quality of housing development, and make sufficient provision for housing including affordable housing (para 20a) within this policy. The key policies for housing are contained primarily in Chapter 5 of the NPPF which, amongst other requirements, states that:

*“To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay”* (para 59)

*“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for”* (para 60)

*“Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes”* (para 61).

*“Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site unless:*

- a) *off-site provision or an appropriate financial contribution in lieu can be robustly justified; and*
- b) *the agreed approach contributes to the objective of creating mixed and balanced communities”* (para 62).

3.13.12 In order to deliver on the policies of the NPPF for housing, local authorities must establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. This can include setting out housing requirement figures for designated neighbourhood plan areas as well.

3.13.13 The NPPF requirements are extensive in relation to housing and as a whole seek to ensure the housing needs of the population are met in the right places and are of the right type, with other policies such as design, climate change, energy efficiency included.

3.13.14 The NPPF identifies that strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a supply of:

- specific, deliverable sites for years one to five of the plan period; and
- specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.

3.13.15 The Planning Policy for Travellers Site (PPTS) document that was published in August 2015 outlines how Local Plans should seek to identify accommodation need for Gypsies, Travellers and Travelling Showpeople, as well as considerations for allocating sites and determining planning applications.

3.13.16 This document notes that local planning authorities should, in producing their Local Plans:

- Identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets;
- Identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15;
- Consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area;
- Relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density; and
- Protect local amenity and environment.

3.13.17 In addition, the PPTS confirms that criteria should be set to guide land supply allocations where there is identified need. Where there is no identified need, criteria-based policies should be included to provide a basis for decisions in case applications nevertheless come forward.

### Local

3.13.18 The Annual Report of the Director of Public Health in East Sussex (2019/20)<sup>87</sup> highlights the fact that whether or not you have your own home, the condition and design of the home, the neighbourhood that surrounds it and whether you need support in living independently can all impact your health in both positive and negative ways. The Report makes the link that housing is one of the major determinants of health, alongside employment - having a job - and relationships - having people to connect with.

3.13.19 The Report acknowledges that there are not enough houses to meet demand and that whilst decent homes standards have improved the quality of social

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<sup>87</sup> [http://passthrough.fw-notify.net/download/175249/http://www.eastsussexjsna.org.uk/JsnaSiteAspx/media/jsna-media/documents/publichealthreports/2019\\_20/DPH-report-2019\\_20\\_lowerWithLogos.pdf](http://passthrough.fw-notify.net/download/175249/http://www.eastsussexjsna.org.uk/JsnaSiteAspx/media/jsna-media/documents/publichealthreports/2019_20/DPH-report-2019_20_lowerWithLogos.pdf)

housing stock, this standard is seen as a bare minimum, and housing officers and registered housing providers are aspiring for higher quality and design, and for this to apply to private sector housing as well.

3.13.20 The Report makes several strategic recommendations in regards to housing in East Sussex as a whole:

- **To make all housing and neighbourhoods healthy** - East Sussex County Council and the District and Borough Councils will work more collaboratively on each of the Local Plans through the existing groups - Local Plan Managers and East Sussex Housing Officers Group (ESHOG), sharing data and intelligence to fully understand housing needs and population distribution and hardwiring the principles of “Putting health into place” to ensure health is central to place making, and the design and delivery of homes and neighbourhoods;
- **To make all homes healthy** - East Sussex County Council, the District and Borough Councils and the NHS will support and promote initiatives that improve the health and safety of homes, including adaptations that improve environmental sustainability, and promote independent living; and
- **To make people healthier in their homes** - East Sussex County Council, the District and Borough Councils, the NHS and the voluntary and community sector in East Sussex will collaborate to integrate the planning and delivery of care and support in housing, ensuring that specific homelessness and rough sleeping support is continued

3.13.21 The Wealden Strategic Partnership (WSP) has a focus within its vision that relates to housing, that is as follows:

- Enough decent, affordable homes to meet the needs of everyone who lives in or needs to live in the district.

3.13.22 In order to address housing development within the district the Council will undertake the required evidence base work, in line with the NPPF to ensure that the housing needs of the district are identified and properly taken into account in the spatial strategy for development as well as the specific policies relating to housing.

3.13.23 In addition to new build, the Council will also need to take account of other strategies being taken forward that relate to housing. The WDC Corporate Plan 2015-2019 sets out the Council’s priorities which are as follows:

- To continue to work with our partners to support:
  - Sustainable economic growth and sound financial management;
  - Engaged, resilient, active communities; and
  - Access to suitable housing, local jobs, services, facilities and leisure opportunities.

3.13.24 The WDC Housing Strategy 2017-2020 sets out how the Council will meet the Corporate Plan objectives by primarily:

- Increasing housing supply;



- Improving housing quality; and
- Providing housing advice and support for individuals and communities.

3.13.25 The WDC Homelessness Strategy 2018-2023 complements the Housing Strategy by directly contributing to all its objectives. It has proposed actions relating to homelessness and rough sleeping, increasing the supply of affordable housing, and improving the quality of housing. The strategies priorities are to:

1. Prevent homelessness in the district and meet our obligations under the Homelessness Reduction Act 2017:
  - Enhance our housing advice and prevention services by updated systems and introducing personalised housing plans;
  - Increase numbers of households assisted to access private rented accommodation;
  - Tackling the wider causes of homelessness; and
  - Ensure effective partnerships are in place to identify and prevent households at risk of homelessness.
2. Secure accommodation for homeless households:
  - Review access to and cost of temporary accommodation and explore alternatives;
  - Increase the supply of new affordable homes;
  - Make best use of existing social stock;
  - Provide assistance with accessing privately rented accommodation; and
  - Reviewing access to social housing;
3. Provide support for homeless households:
  - Work in partnership to deliver support services;
  - Ensure households are accessing appropriate support to sustain their tenancy and manage their lives; and
  - Ensure support services are meeting the needs of customers, are cost effective and compliment other services.

3.13.26 Whilst all of the above will be key considerations in the development of the new Local Plan, the targets under Priority 2 are likely to be best addressed through the development of the Local Plan.

3.13.27 The Wealden Older Persons Housing and Support Strategy 2008-2028 has been produced in partnership with East Sussex County Council and a number of other key stakeholders to specifically address issues relating to older persons housing and support. The strategy aims: ‘To enhance the social inclusion, dignity, choice and independence of older people living in the district, by maintaining people in their own homes and through the provision of a range of housing and housing related support services’.

### **Baseline and Trends**

3.13.28 Wealden’s high quality of life and its proximity to London and the Crawley/Gatwick area, creates a high demand for housing, especially in the north of the District. Studies of the housing market in the district have confirmed the existence of quite distinct housing market areas within it. This has in the past exerted

considerable upward pressure on house prices, particularly in the north of the district and has caused a widening gulf between local incomes and market prices, and led to significant shortages of market housing that is affordable for local households.

### Households

3.13.29 In 2018 there were 68,110 households in Wealden, an increase of just over 11% from 2008<sup>88</sup>, and by 2032 the figure is projected to reach 83,627 households<sup>89</sup>. The type of household is projected to change over the next 25 years, with an increase in one person households predicted and a decrease in households with children. By 2032, just over 30% of households in the district will be single person households, compared to just over 23% being households with children<sup>90</sup>.

3.13.30 The majority of single person households currently comprise of those aged over 65 and it is this age group that will see the highest percentage increase moving forward. However, Table 9 does show that the 35-44 and 55-64 age groups will also increase in terms of one person households. This may reflect societal changes but also reflects the ageing population of the district.

Age	Year						% change 2016-2032
	2016	2020	2023	2026	2029	2032	
16-24	249	220	206	209	224	235	-5.6
25-35	906	941	950	925	895	881	-2.8
35-44	1,332	1,405	1,521	1,570	1,601	1,613	21.1
45-54	2,607	2,625	2,475	2,397	2,389	2,511	-3.7
55-64	3,153	3,666	3,951	4,093	4,031	3,806	20.7
65-74	4,382	4,416	4,256	4,462	4,883	5,306	21.1
75-84	3,940	4,411	5,169	5,692	5,943	5,897	49.7
85+	2,499	2,677	2,868	3,086	3,587	4,329	73.2

**Table 9: Age structure of one person households<sup>91</sup>**

### House prices and affordability

3.13.31 In common with the rest of the South East of England, the cost of housing is extremely high in Wealden. In the first quarter of 2019 (Q1), the average house price in the district was £319,950, an increase of 27.9% on the average house price in 2015<sup>92</sup>. The district is also the second most expensive in terms of average house prices in the county, with Lewes being the highest at an average price of £320,000.

<sup>88</sup> ONS Household Estimates 1991-2018 – districts. Available at: [www.eastsussexinfigures.org.uk](http://www.eastsussexinfigures.org.uk)

<sup>89</sup> ESCC Projections April 2020. Household projections (dwelling-led), 2018-2033 – districts. Available at: [www.eastsussexinfigures.org.uk](http://www.eastsussexinfigures.org.uk)

<sup>90</sup> ESCC Projections April 2020. Household projections (dwelling-led), 2018-2033 – districts. Available at: [www.eastsussexinfigures.org.uk](http://www.eastsussexinfigures.org.uk)

<sup>91</sup> Office for National Statistics, 2016-based Household Projections in England. Household projections trend-based by type, 2016-2041 – districts. Available at: [www.eastsussexinfigures.org.uk](http://www.eastsussexinfigures.org.uk)

<sup>92</sup> Office for National Statistics house price data for small areas (2019). Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/articles/housepricestatisticsforsmallareasexplained/2015-12-15/relateddata> and <http://www.eastsussexinfigures.org.uk>

3.13.32 The attractiveness of the district as a place to live is also reflected in the rent levels found in the private sector. The average rent in the South East in 2019 was £875 per month and in East Sussex it was £795 per month. Wealden District has the second highest rent at £895 per month, again only slightly behind Lewes where private rental in 2019 was £950 per month<sup>93</sup>.

3.13.33 Affordability of housing within Wealden is therefore an issue, particularly for existing residents of the district. The median house costs are over 11 times the median gross annual earnings of residents in the district<sup>94</sup>, which in 2019 were £27,046<sup>95</sup>. It is also relevant that there are disparities in terms of house prices and affordability between the north and south of the district, with the north historically being more expensive and therefore less affordable than the south.

### Social housing stock

3.13.34 As well as the private rented sector, the district also has a local authority rental sector and there are tenancies from Housing Associations (HA) and social housing providers (SHP). Weekly rents for local authority housing are £86.75 per week and with HA and SHP the weekly rent is £103.84<sup>96</sup>.

3.13.35 In 2019, the number of local authority houses for rent within the district was 2,941, with 2,618 being provided by housing associations and social providers<sup>97</sup>. This represents a drop in local authority affordable housing from 3,062 in 2015. However, the Council has since formed Sussex Weald Homes and is building affordable homes for the district again. In comparison, housing association and social provision has increased from 2,327 units in 2015 to the current level, and so affordable housing provision is coming forward.

### Housing commitments, commencements and completions

3.13.36 As of April 2019, there were 6,420 housing commitments in Wealden, with the vast majority (85.3%) being granted on Greenfield sites, reflecting the lack of previously developed land within the district. Table 10 shows these housing commitments by site size. As can be seen, the overwhelming majority are large sites although there are a significant number of small sites of 5 or less dwellings, which may reflect the introduction to the market of smaller, independent developers or self-builders. It is interesting to note that Wealden has the largest commitments on sites of 5 dwellings or less of the 5 local authorities within East Sussex.

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<sup>93</sup> Valuation Office Agency (June 2019). Available at <http://www.eastsussexinfigures.org.uk>

<sup>94</sup> Office for National Statistics. House Price to Workplace-Based Earnings Ratio (March 2020) Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian>

<sup>95</sup> Office for National Statistics. House Price to Workplace-Based Earnings Ratio (March 2020) Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian>

<sup>96</sup> Ministry of Housing Communities and Local Government (MHCLG), Live tables 701, 702 and 704. Local Authority and PRP rents, 1999-2018 – districts. Available at: [www.eastsussexinfigures.org.uk](http://www.eastsussexinfigures.org.uk)

<sup>97</sup> Social Housing Stock, 1997 – 2019. Source Ministry of Housing Communities and Local Government (MHCLG), Live tables 115 and 116. Available at: [www.eastsussexinfigures.org.uk](http://www.eastsussexinfigures.org.uk)

	Up to 5 dwellings	6 to 9 dwellings	10+ dwellings
Eastbourne	181	160	586
Hastings	175	122	1,831
Lewes	204	273	1,933
Rother	86	14	3,169
Wealden	584	133	5,703

**Table 10: Housing commitments by site size as at April 2019 - districts<sup>98</sup>**

3.13.37 The Councils Authority Monitoring Report (AMR)<sup>99</sup> shows that 828 net new houses were completed within Wealden District (excluding housing completions within the South Downs National Park) in 2018/19. This is substantially higher than in the previous monitoring periods and also exceeds the previously adopted housing target within the Core Strategy (2013) of 450 houses per annum (dpa). However, this is still far short of the new housing needs figure for Wealden District set under the 'standard methodology' of approximately 1,230 dwellings per annum (this varies each year).

3.13.38 The AMR 2018/19 reports that the number of affordable housing completions fell marginally from 144 in 2017/18 to 130 in 2018/19. If the affordable housing completions were compared to the overall net housing completions for the monitoring period 2018/19, then this would equate to around 16% of all net housing completions being affordable. This is substantially lower than the affordable housing target in the Affordable Housing Delivery Local Plan (May, 2016), which requires the delivery of 35% of all net completions to be affordable.

#### Self-Build and Custom Build<sup>100</sup>

3.13.39 A total of 21 applications to the Self-Build and Custom Housebuilding Register were logged between 31<sup>st</sup> October 2018 and 30<sup>th</sup> October 2019, resulting in a requirement for at least 21 suitable self and custom build plots to be granted planning permission between 31<sup>st</sup> October 2019 and 30<sup>th</sup> October 2022. Since the introduction of the Self-Build and Custom Housebuilding Register on 1<sup>st</sup> April 2016 to the 30<sup>th</sup> October 2019, there has been 71 individuals registered (no organisations). The monitoring of planning permissions for such self-build and custom build plots within Wealden will be included within the AMR from 2019/20 period.

3.13.40 Analysis of the information held on the Self-Build and Custom Housebuilding Register shows that 60% of the individuals applying to the register currently reside within Wealden District, 16% currently live outside of Wealden District but within East Sussex and 24% of applications were received from those who currently live outside of East Sussex.

3.13.41 There is a variation in plot size demand from those enrolled on the register, but 77% of applicants were interested in a plot of land under 1,500 sq. m in

<sup>98</sup>East Sussex County Council On-line Housing Development Monitoring Database, Lewes District Council planning department (October 2019). Housing commitment by site size at April 2019 – districts. Available at: [www.eastsussexinfigures.org.uk](http://www.eastsussexinfigures.org.uk)

<sup>99</sup> <https://www.wealden.gov.uk/planning-and-building-control/planning-policy/planning-policy-documents/authority-monitoring-report/>

<sup>100</sup> See the Authority Monitoring Report 2018/19

size. A plot of land beyond 2,000 sq. m in size was only requested by 10% of applicants to the register and furthermore 10% of applicants stated that they would consider a plot of land of any size.

3.13.42 All applicants to the Self-build and Custom Housebuilding Register stated that they would be interested in a detached dwelling house, with 76% of applicants solely seeking to build a detached dwelling house. Furthermore, 14% of applicants are interested in building a semi-detached house, 4% expressed interest in a terraced dwelling house and 1% of applicants to the register are interested in a flat or apartment. Of those on the register, the following property sizes were stated as preferences:

- One bedroom – 1%
- Two bedrooms – 19%
- Three bedrooms – 36%
- Four bedrooms – 39%
- Five bedrooms or more – 4%

### Housing tenure

3.13.43 The district has a higher proportion of owner occupied properties and a lower proportion of Council and other social rented properties. Of the owner occupiers, just over 42% owned their property outright without a mortgage<sup>101</sup>. This is a slight increase on the 2001 figure which stood at 40.9%.

3.13.44 The percentage of home owners with a mortgage stood at 41.6% in 2001 and has since decreased to 36.5% in 2011. Clearly in 2001 the figures were much closer together than now.

3.13.45 The proportion of properties rented from the Council has also fallen, from 5.3% in 2001 to 4.7% in 2011, whereas properties rented from other social providers has remained relatively stable at 2.5% in 2001 and 3% in 2011. The biggest change has been in the proportion of private rented properties, which has jumped from 5.6% in 2001 to 11.1% in 2011.

3.13.46 It is interesting to note that of the mortgage free properties, 14.6% are one person households, although the majority still comprise of a family unit (25.9%)<sup>102</sup>.

3.13.47 Nearly 45% of all household spaces<sup>103</sup> within the district are detached houses or bungalows<sup>104</sup>. This highlights the fact that there is a proportionally higher availability of detached properties in the district. This may not necessarily meet the housing needs of the population and will be considered in detail as part of the Council's Housing Needs Assessment in support of the Local Plan.

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<sup>101</sup> East Sussex in Figures, 2013. Households by Housing Tenure in 2011. Available at:

<http://www.eastsussexinfigures.org.uk>

<sup>102</sup> East Sussex in Figures, 2013. Households by tenure and household composition in 2011. Available at

<http://www.eastsussexinfigures.org.uk>

<sup>103</sup> A household space is the accommodation used or available for use by an individual household.

<sup>104</sup> East Sussex in Figures <http://www.eastsussexinfigures.org.uk>

## Gypsies, Travellers and Travelling Showpeople

3.13.48 The Council undertook a Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (GTAA) in November 2016. This assessment was undertaken following the change in definition to Gypsies, Traveller and Travelling Showpeople in 2015. This assessment indicated that for period from 2016 to 2037/38, there was an additional permanent need for 21 'travelling' households in the district for this period (that met the new definition).

3.13.49 This included 10 'travelling' households in a current need that included households on unauthorised developments, those in overcrowded accommodation, need from older teenage children and movement from bricks and mortar. In addition, this included 12 'travelling' households with a future need (beyond five years) largely from new household formation. There was a single vacant public pitch at the time of the report.

3.13.50 As part of the new Local Plan, the Council will be updating its evidence base with regards to the permanent accommodation needs of Gypsies, Travellers and Travelling Showpeople, as well as transit accommodation needs across the County.

### Housing need

3.13.51 The Homelessness Reduction Act (HRA) 2017 came into effect in April 2018, and includes a shift of focus for local authorities to preventing rather than dealing with the consequences of homelessness.

3.13.52 During April 2018 - March 2019<sup>105</sup>, a total of 446 households approached, and were assessed by the Council as being threatened with homelessness or were presenting as homeless. The Council assessed 436 households as being eligible for help and was successful in preventing homelessness for 204 households by facilitating moves to alternative accommodation or enabling households to remain in their existing accommodation. The majority of homelessness preventions in the district are through securing existing or alternative accommodation for six months or more.

3.13.53 There are currently 827 households on the Council's housing waiting list<sup>106</sup>. Of these households, 49.6% require a 1 bedroom property; 29.8% require a 2 bedroom property; 16.7% require a 3 bedroom property; 3.9% require a property with 4 bedrooms and 0.12% require a property with 5 bedrooms.

### **Key Sustainability Issues**

3.13.54 The key issues arising from the review of PPPs and baseline information relating to housing are:

- Affordability within the district remains a significant problem;

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<sup>105</sup> <https://www.gov.uk/government/statistical-data-sets/live-tables-on-homelessness#contents>

<sup>106</sup> Wealden District Council Housing & Property Services Team (provided on 27<sup>th</sup> April 2020).



- The Council will be required to find a way to meet its housing need, as calculated by the standard methodology (unless exceptional circumstances justify an alternative approach), whilst also taking into account the sensitive natural environment of the district;
- The Council for the 2019 Housing Delivery Test (HDT) measurement fell short of its requirement at 87% and is required to undertake a Housing Action Plan in order to plan for improved housing delivery rates. This needs to be taken forward in the Local Plan;
- The housing mix at present in the district does not necessarily match what the demand is i.e. acute requirements for smaller properties and affordable properties;
- There is a limited amount of affordable (rented / part-owned) homes in the district including those provided by the Council;
- The Council's housing waiting list indicates that the provision of one or two bedroom accommodation for social affordable rent is the main priority;
- There is a healthy interest in the self-build and custom build market;
- There will be a requirement to deliver new permanent Gypsy and Traveller pitches for the new Local Plan period.
- The type of household is projected to change over the next 15 years with an increase in one person households predicted and a decrease in households with children; and
- By 2032, nearly a third of all households in the district will be one person and the largest increase will be in one person households over 65.

### **Likely evolution without the Local Plan**

3.13.55 The likely evolution without the Local Plan is:

- Failure to provide housing to meet the needs of households within the district in terms of age profile, tenure of house required etc.;
- House prices continue to rise and affordability worsens;
- Unable to meet increase in one person households, particularly for those aged over 65;
- The Council would be unable to achieve the housing need figure calculated via the 'standard methodology' in the NPPF (2019) and will not meet its Housing Delivery Test (HDT) requirements;
- Lack of a strategic framework would likely result in significant speculative development coming forward, particularly where it cannot meet its HDT requirements and is subject to various penalties;
- The Council would not be able to meet the needs of the self and custom build market; and
- The Council would not be able to meet the accommodation needs of Gypsy, Traveller and Travelling Showpeople community.

### **Possible Local Plan/Policy Approach to sustainability issues**

3.13.56 The possible Local Plan/Policy approaches to the sustainability issues are:



- The Local Plan and policies should ensure that development provides sufficient and suitable homes for all sections of the community, including meeting the affordable housing needs, older persons housing needs, gypsies, travellers and travelling showpeople, and the self-build/custom build plot requirements of the district;
- It is likely that there will be the need to allocate land for housing – market and affordable – and this must be carefully considered given the various constraints of the district;
- The location of additional housing (including site allocations) is important and the Local Plan and policies should ensure that it is situated on land and in areas accessible to employment, services & facilities, public transport, walking and cycling routes;
- Where possible, housing should be situated on previously developed land, although there is acknowledgement that there is a limited legacy of this type of land within the district;
- Policies will need to look at the housing mix required in the district in order to accommodate the changing age profile of the district, ensuring suitable housing adaptability where possible. Housing policies must account for the life stages of the districts population;
- Policies will need to consider the overall housing tenure mix for the district in line with the locally produced housing needs assessments;
- The Strategic Housing and Economic Land Availability Assessment (SHELAA) will be a key document in support of the Local Plan to ensure that allocations for housing are provided in the most suitable locations;
- The overall approach to housing within the Local Plan needs to take into account the Council’s Housing Strategy, Older Persons Housing Strategy and any other local strategies as appropriate and relevant; and
- Consider opportunities to design in safe and accessible walking and cycling networks to developments. This could then help support and encourage the proportion of residents who walk and cycle in the District. This could have beneficial impacts on health, obesity, reducing emissions and sustainable transport.

### **Sustainability Appraisal Objectives**

3.13.58 In order to address these sustainability issues, there should be sustainability appraisal objectives dealing with:

- Providing good quality, affordable homes suitable for all life stages;
- Creating healthy, safe and inclusive communities/environments;
- Climate change impacts including energy efficiency of homes; and
- Making the most efficient use of land.

## 3.14 Health and Wellbeing

### Relevant Plans, Policies and Programmes (PPPs)

#### International

3.14.1 At the international level, the following PPPs have relevance to health and wellbeing:

- UN Resolution 2015 Transforming our world: the 2030 Agenda for Sustainable Development (2015);
- UN Paris Climate Change Agreement (2016); and
- Kyoto Protocol on Climate Change, United Nations, 1997

3.14.2 The 2030 Agenda for Sustainable Development (2015) has at its heart a universal call to action to end poverty, protect the planet and improve the lives and prospects of everyone. The 17 Goals it sets out, and which were adopted by all UN Members in 2015 as part of the 15 year plan to achieve them, includes Goal 3 'Ensure healthy lives and promote well-being for all at all ages', which incorporates various health issues ranging from road-traffic accidents to reducing the numbers of deaths and illnesses from hazardous chemicals and air, water and soil pollution and contamination.

3.14.3 The PPPs related to climate change are fundamentally connected to health and wellbeing as they seek to ensure climate change is addressed and its impacts are mitigated, as well as preparing the world for climate change adaptation.

#### European

3.14.4 At the European level, the following PPPs have relevance to health and wellbeing:

- **European Environmental Noise Directive (2002)** - Sets out a hierarchy for the avoidance, prevention and reduction in adverse effects associated with environmental noise, including noise generated by road and rail vehicles, infrastructure, aircraft and outdoor, industrial and mobile machinery.
- **European Air Quality Framework Directive (1996) and Air Quality Directive (2008)** - Puts in place measures for the avoidance, prevention, and reduction in harmful effects to human health associated with ambient air pollution and establishes legally binding limits for the most common and harmful sources of air pollution.
- **European Floods Directive (2007)** – Provides a framework for the assessment and management of flood risk, aiming at the reduction of the adverse consequences for human health, amongst other concerns.

## National

3.14.5 The government's 25 Year Environment Plan (2018) recognises and acknowledges that having contact and experiences in the natural environment can help improve people's health and wellbeing, both mentally and physically. It seeks to ensure that people are connected with the environment by the government aiming to:

- Help people improve their health and wellbeing by using green spaces including through mental health services;
- Encourage children to be close to nature, in and out of school, with particular focus on disadvantaged areas;
- 'Green' our towns and cities by creating green infrastructure and planting one million urban trees; and
- Make 2019 a year of action for the environment, working with Step Up To Serve and other partners to help children and young people from all backgrounds to engage with nature and improve the environment.

3.14.6 In September 2019, Public Health England (PHE) published the PHE Strategy 2020-25 which sets out how PHE will work to protect and improve the public's health and reduce health inequalities over the next 5 years. There is also the NHS long term plan and Sport England's 'Shaping our Future' strategy that will target the most inactive. The PHE Strategy 2020-25 sets a number of priorities that it seeks to achieve:

1. A smoke free society;
2. Healthier diets and healthier weights;
3. Cleaner air;
4. Better mental health;
5. Best start in life;
6. Effective responses to major incidents;
7. Reduced risk from antimicrobial resistance;
8. Predictive prevention;
9. Enhanced data and surveillance capabilities; and
10. New national science campus

3.14.7 The Government have recently produced a policy paper on 'Tackling Obesity: empowering adults and children to live healthier lives'<sup>107</sup>, in recognition that tackling obesity is one of the greatest long-term health challenges this country faces.

3.14.8 In terms of planning and development in relation to health and wellbeing, this is a key central theme in the NPPF (2019) and permeates through many areas of national policy. Chapter 8 of the NPPF is the primary section that contains policies to promote healthy and safe communities.

3.14.9 The NPPF requires that planning policies and decisions promote social interaction, including opportunities for meeting between people and that this can be achieved through, for example, "...mixed-use developments, strong neighbourhood

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<sup>107</sup> Department of Health and Social Care (July 2020). Tackling Obesity: empowering adults and children to live healthier lives. <https://www.gov.uk/government/publications/tackling-obesity-government-strategy/tackling-obesity-empowering-adults-and-children-to-live-healthier-lives>

centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages” (para 91a).

3.14.10 It also requires that planning policies and decisions create places that are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion (para 91b). Planning policies should also support healthy lifestyles, especially where this would address identified local health and well-being needs, and this can be achieved through the provision of accessible green infrastructure, sports facilities, local shops, access to healthier food and development layouts that encourage walking and cycling (para 91c).

3.14.11 In order to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should plan positively for the provision and use of shared spaces, community facilities and other local services; take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community; guard against the unnecessary loss of valued facilities and/ services; ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community and ensure an integrated approach to considering the location of housing, economic uses and community facilities and services (para 92).

3.14.12 The NPPF also requires planning policies to promote public safety and take into account wider security requirements.

3.14.13 Other sections of the NPPF also contribute indirectly to the health and wellbeing of people including housing provision that is of the right type and tenure; open space and recreation provision; a strong economy; sustainable transport in the form of cycling and walking and high quality communications networks. As a whole the NPPF is seeking to facilitate sustainable development that will overall improve health and wellbeing.

### Local

3.14.14 As already highlighted in section 3.13 ‘Housing’ (paragraphs 3.13.18 – 3.13.20) good housing is key to maintaining good health and East Sussex County Council will work collaboratively with the East Sussex LPAs to achieve healthy homes and neighbourhoods. The Healthy Town Network – a joint project between the NHS, Public Health England, housing developers and housing associations – is piloting a number of ‘Healthy Towns’ schemes to assess the benefits and learn from them. Sport England has also produced guidance on creating active environments<sup>108</sup> as it is acknowledged that the design of where we live and work can play a vital role in keeping us active.

3.14.15 The Sussex Health and Care Partnership’s Population Check (2019) focuses on the following priorities to allow services to better meet the needs of the population:

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<sup>108</sup> Sport England, Active Design <https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design>

- Looking at new ways to treat and care for more people and using staff more effectively;
- Helping people manage, and make decisions about, their own health and care better;
- Helping people make the right lifestyle choices;
- Reducing unjustified differences in clinical treatment; and
- Providing services closer to home with good communication and coordination.

3.14.16 The East Sussex Health and Social Care Plan (April 2020) plan has been produced by the East Sussex Clinical Commissioning Groups, East Sussex County Council (ESCC), East Sussex Healthcare NHS Trust (ESHT), Sussex Community NHS Foundation Trust (SCFT), and Sussex Partnership NHS Foundation Trust (SPFT). The partnership works together to deliver health and social care in East Sussex. By breaking down barriers between health and social care, improving the health and wellbeing of local people, and reducing health inequalities it will deliver the right care and support, at the right time and in the right place for the population of East Sussex.

3.14.17 The Plan aims to further strengthen work across the county through the East Sussex health and care programme to meet the needs of the population, including how to respond to the areas of deprivation and the significant older population that often have multiple-complex needs.

3.14.18 The Wealden Strategic Partnership (WSP) contains several elements of its vision that relate to health and wellbeing:

- Reduce health inequalities, provide appropriate information and advice and access to health and social care services in order to maximise the potential for good health and well-being;
- Enough decent, affordable homes to meet the needs of everyone who lives in or needs to live in the District;
- Access to lifelong learning, education and skills training to allow Wealden residents to fulfil their potential;
- A broad range of opportunities to improve quality of life, health and well-being, including sport, leisure, recreation and the arts; and
- Residents and visitors to Wealden are confident of their safety and free from the fear of crime.

3.14.19 The Partnerships current priorities are the economy; health and communities.

3.14.20 The Council's Corporate Plan 2019-2023 contains a number of aims and objectives that are related to health and wellbeing including promoting a better quality of life for the districts residents through activities that improve health, resilience and well-being. In terms of health and wellbeing, the Corporate Plan's priorities lie with wanting local communities to have the opportunity to enjoy an excellent quality of life through:

- Active, healthy and fulfilling lifestyles;
- Access to good health care;
- Safe environments for all ages;
- Thriving community clubs, sport, recreation and leisure; and
- Good housing local people can afford, in places they want to live.

3.14.21 The Corporate Plan also contains the Councils framework to achieving the above.

3.14.22 There is growing evidence that creative and cultural activity can lead to improved health and wellbeing and the Council is working on developing deeper partnerships with the Department of Health and Social Care, NHS England, social care providers and others to support further research in this area, learn from what is proven to work internationally, and explore the potential of promising new approaches such as social prescribing. The Council are working with a number of partners to deliver a successful ‘health coach’ programme at GP surgeries in Herstmonceux and Hailsham for example.

3.14.23 The ‘Healthy Wealden – A Health and Wellbeing Strategy (2017-2020)<sup>109</sup> was published in the autumn of 2017 and identifies that both physical and mental health and wellbeing are key priorities for the District given the rapidly growing and ageing population, and the associated challenges of independent living, rural isolation, and accessibility. The Strategy highlights the significant role that Wealden District Council has in delivering the public health agenda with three broad priority health and wellbeing themes recognised for Wealden residents:

- Reducing obesity levels;
- Increasing physical activity levels; and
- An increasingly ageing population creating a series of additional needs.

3.14.24 The Intergenerational Strategy will look into how the Council services, infrastructure, housing, technology and communities will need to evolve in order to continue meeting the demands of Wealden’s residents. It further looks at a number of ‘age friendly’ policies and best practice examples. This report will be published in late 2020.

3.14.25 Research into the usage of the Cuckoo Trail commenced in summer 2020. A strategy and Action Plan will be published in late 2020. Further background on the trail and a copy of the Cuckoo Trail leaflet can be found on the Council’s website<sup>110</sup>.

3.14.26 Officers have been working closely with the East Sussex, Healthy Weight Partnership to develop a Whole System Approach to obesity as set out in Public England’s guidance<sup>111</sup>. The East Sussex, Whole System Approach to Obesity is planned to be published in 2021.

<sup>109</sup> [https://www.wealden.gov.uk/UploadedFiles/Healthy\\_Wealden\\_Strategy\\_2017-2020.pdf](https://www.wealden.gov.uk/UploadedFiles/Healthy_Wealden_Strategy_2017-2020.pdf)

<sup>110</sup> <https://www.wealden.gov.uk/leisure/tourism/the-cuckoo-trail/>

<sup>111</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/820783/Whole\\_systems\\_approach\\_to\\_obesity\\_guide.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/820783/Whole_systems_approach_to_obesity_guide.pdf)

3.14.27 Other local PPPs that will have a bearing on the health and wellbeing of the district's population include the Housing Strategy 2017-2020; the Homelessness Strategy 2018-2023; the Wealden Older Persons Housing and Support Strategy 2008-2028 as well as strategies concerning the economy, open space and recreation (which are included in later sections of this chapter).

## **Baseline and Trends**

### Life expectancy

3.14.28 Life expectancy in the district is very good, with the average for males standing at 81.2 years and for females 84.7 years in 2016-2018. This average has been relatively consistent over the last 7 years<sup>112</sup>. For those aged over 65 the average life expectancy is 19.8 years for males and 22.3 years for females. Both life expectancy measures are above the national, regional and county averages.

### Self-reported health

3.14.29 The health of the districts residents is also important. When asked to assess their overall health as part of the 2011 Census, the overwhelming majority of residents reported themselves as being in either very good or good health (82.5%), with only 4.5% reporting that their health was bad or very bad. The remaining 13% reported their health as being fair.

### Disabilities

3.14.30 Although life expectancy and overall health reporting are very good for the district, there is a proportion of residents living with one or more disability. Figure 16 shows the projected number of people with a disability by age group in the district, for the period 2017-2032.

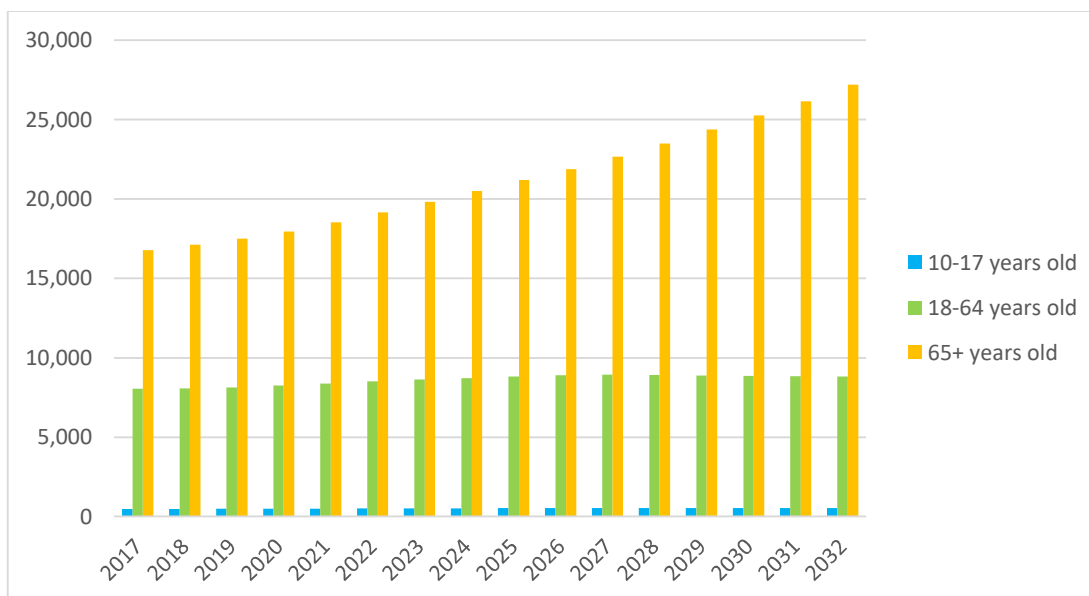
3.14.31 The data shows that the largest increase will be within the 65+ age group, with a rise of 38.3% by 2032. There will also be a relatively significant rise in the 10-17 age group of 12.5% by 2032 and 8.6% in the 18-64 age group.

3.14.32 Figure 16 shows that the district will not only have an ageing population but also a larger proportion of older residents with disabilities that may need additional help and services. It will also be important to address the increases in the younger age groups as well.

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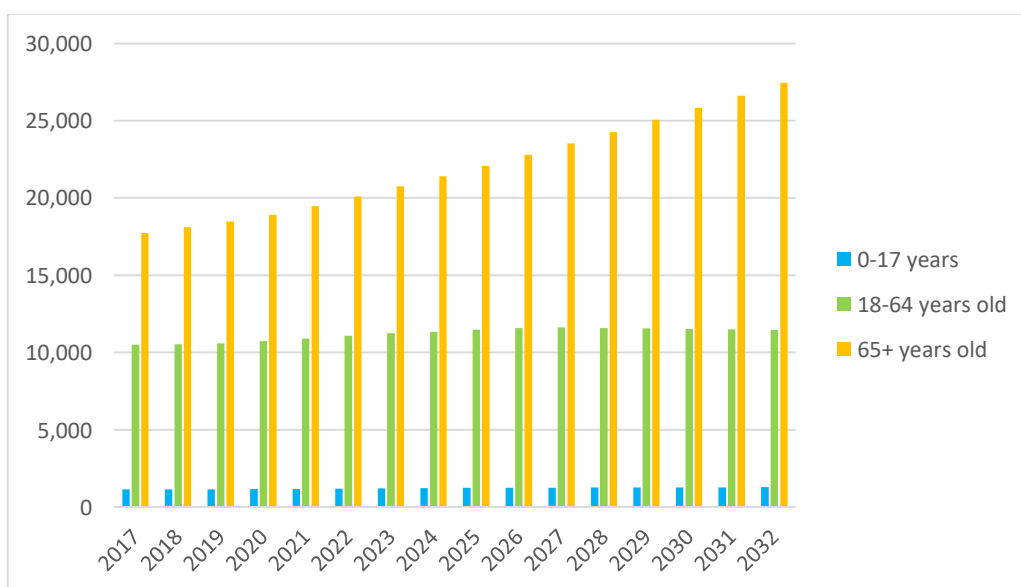
<sup>112</sup>Office for National Statistics. Life expectancy at birth by gender, 1991-2018 – districts. Available at: [www.eastsussexinfofigures.org.uk](http://www.eastsussexinfofigures.org.uk)





**Figure 16: Disability projections (dwelling-led), 2017-2032 - districts<sup>113</sup>**

3.14.33 There is a similar trend in the number of people living with a limiting long term illness in the district. Figure 17 shows the projected number of people with a limiting long-term illness by age group in the district, for the period 2017-2032.



**Figure 17: Limiting long-term illness projections (dwelling-led), 2017-2032<sup>114</sup>**

3.14.34 As with the data on disability, it is clear that the largest projected increase will be within the 65+ age group, with an increase of 35.4% by 2032. Again this data shows that the district will have a large proportion of older residents with limiting long term illnesses that may need additional help and services. However, it also reflects the case that as people age, illnesses may become more prevalent in

<sup>113</sup> East Sussex County Council Research Team (May 2019) Disability projections (dwelling-led), 2017-2032 - districts. Available at: [www.eastsussexinfigures.org.uk](http://www.eastsussexinfigures.org.uk)

<sup>114</sup> East Sussex County Council Research and Information Team (May 2019). Available at: <http://www.eastsussexinfigures.org.uk>

general. Attention will also need to be paid to the increases within the 0-17 age group (11% by 2032) and the 18-64 age group (8.4% by 2032).

### Access to GP Surgeries (2014)

3.14.35 Within the district, only 67.4% of households have access to a GP practice within 15 mins by public transport or walking<sup>115</sup>. This is the lowest percentage out of the local authorities in East Sussex and is far below the county figure of 77.2%. This is important to acknowledge and account for in the Local Plan when looking at where development should be located and also when looking at GP provision in the district.

3.14.36 It is worth noting that, according to the Joint Strategic Needs & Asset Assessment (JSNAA)<sup>116</sup>, accessibility varies across the district. For example in Hailsham and Polegate 84% of households can get to a GP practice within 15 minutes using public transport or walking, whereas in Uckfield this figure is 53% and in Crowborough this figure is 60%<sup>117</sup>.

### Obesity

3.14.37 As identified within the Health and Wellbeing Strategy (2017-2020), childhood excess weight is an issue within the district. In 2018/19, the percentage of reception aged children (4-5 years old) that were considered to be overweight was 12.3% and 8% were considered to be obese, including being severely obese<sup>118</sup>. Of those children in Year 6 (10-11 years old), 11.4% were considered to be overweight in 2018/19 with 15% being considered obese, including severely obese. Despite these figures, the district has the lowest percentage of year 6 children who are overweight or obese (significantly lower than East Sussex)<sup>119</sup>.

3.14.38 There is also a need to address issues with levels of adult obesity, which are high within the district and above the national average. The Joint Strategic Needs and Assets Assessment (JSNAA) latest data show that in 2015, 63.5% of the adult population within Wealden were considered to be overweight or obese<sup>120</sup>.

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<sup>115</sup> Department for Transport, Journey time statistics: Access to services 2016. Access to GPs, 2014-16 - super output areas. Available at: <http://www.eastsussexinfigures.org.uk>

<sup>116</sup> The Joint Strategic Needs Assessments process (JSNA) examines a broad cross-section of data and reveals needs which might otherwise be overlooked. Particular priorities have been identified by staff, patients and members of the public in focus groups, meetings and surveys. The data is presented under each Clinical Commissioning Group (CCG)

<sup>117</sup> Scorecard 2.13 Percentage of households that can access a GP practice within 15 minutes using public transport/walking, 2014 (modelled). Available at: <http://www.eastsussexjsna.org.uk/JsnaSiteAspx/media/jsna-media/documents/scorecards/2018/NHSView2WiderDeterminantsMarch2018.pdf>

<sup>118</sup> Public Health England. NCMP and Child Obesity Profile (2018/19). Available at: [https://fingertips.phe.org.uk/profile/national-child-measurement-programme/data#page/1/gid/8000011/pat/6/par/E12000008/ati/101/are/E07000065/iid/90316/age/200/sex/4/cid/4/page-options/car-do-0\\_ovw-tdo-0](https://fingertips.phe.org.uk/profile/national-child-measurement-programme/data#page/1/gid/8000011/pat/6/par/E12000008/ati/101/are/E07000065/iid/90316/age/200/sex/4/cid/4/page-options/car-do-0_ovw-tdo-0)

<sup>119</sup> Area Summary for Wealden District (March 2018) <http://www.eastsussexjsna.org.uk/JsnaSiteAspx/media/jsna-media/documents/scorecards/2018/Area%20Summaries/LA%20View/LA-Area-Summary--Wealden-2018.pdf>

<sup>120</sup> Public Health, East Sussex County Council, [www.eastsussexjsna.org.uk](http://www.eastsussexjsna.org.uk) JSNAA Scorecards – LA View 2018.

## Walking and cycling

3.14.39 Data shows that in 2016/17 only 2.9% of the adult population in the district cycled at least 5 times a week, whereas 30.7% walked for at least 10 mins five times a week<sup>121</sup>.

	Cycle				Walk (at least 10 minutes)			
	1 x per month	1 x per week	3 x per week	5 x per week	1 x per month	1 x per week	3 x per week	5 x per week
England	16.9	11.9	5.7	3.4	78.4	69.4	43.1	32
South East	19.4	13.4	6.1	3.6	81.2	71.5	44.4	32.4
Wealden	13.4	8.2	3.3	2.9	79.1	67.6	42	30.7

**Table 11: Walking and cycling for any purpose 2016/17**

3.14.40 However, the proportions undertaking walking for leisure in the district are significantly higher than the national, regional and local proportions, which could indicate Wealden's attractiveness for walking and is an encouraging trend. By contrast, cycling is relatively low overall and this could reflect issues with safety on the roads or the lack of cycle infrastructure within the district.

	Cycle				Walk (at least 10 minutes)			
	1 x per month	1 x per week	3 x per week	5 x per week	1 x per month	1 x per week	3 x per week	5 x per week
England	13.6	8	2.3	1.1	60.8	47.8	21.7	15.7
South East	16	9.3	2.5	1.1	66	51.3	23.2	16.4
East Sussex	13.4	7.9	2.3	1.1	67.1	53.3	25.8	19.3
Wealden	12.2	6.8	2.1	1.5	68.9	55.1	28.4	22.6

**Table 12: Walking and cycling for leisure 2016/17**

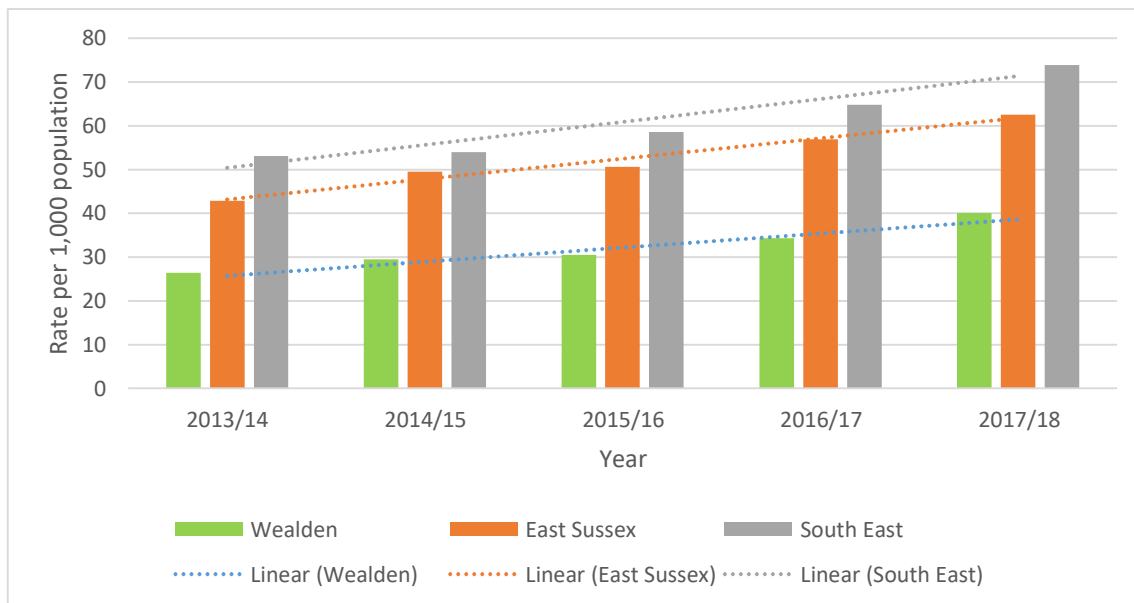
3.14.41 The Active Lives Survey East Sussex shows that in 2018-19 just over 62% of the adult population in Wealden (those aged 16 years +) were active and undertook 150 mins or more of physical activity per week. The data also shows that 26% of the adult population in Wealden were inactive, undertaking less than 30 mins of physical activity per week<sup>122</sup>.

## Crime and Community Safety

3.14.42 In terms of crime, Wealden remains one of the safest districts in East Sussex with an overall crime rate of 40.1 crimes per 1,000 population in 2017/18 (6,372 offences). This is the best out of the 5 East Sussex districts for the 2017/18 period. Whilst this does represent an increase from 26.4 in the 2013/14 period, the rate is still far lower than the average for the South East region (see Figure 18).

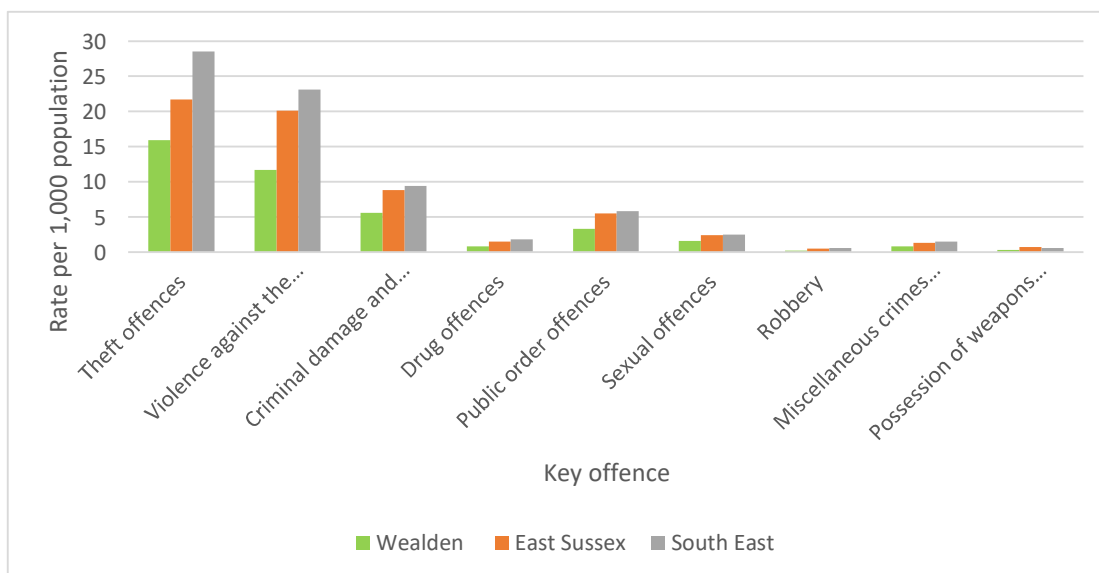
<sup>121</sup> Department for Transport. Walking and cycling, 2010-2017 – districts. Available at: [www.eastsussexinfofigures.org.uk](http://www.eastsussexinfofigures.org.uk)

<sup>122</sup> <https://www.activesussex.org/funding-insight/insight/active-lives-survey-sussex/>



**Figure 18: Recorded total crimes per 1,000 population<sup>123</sup>**

3.14.43 From looking at Figure 19, it can be seen that theft offences and violence against the person are the main criminal behaviours in the district, followed by criminal damage and arson, public order offence and sexual offences. However, these rates are very low.



**Figure 19: Recorded crime by key offence, 2017/2018 per 1,000 population<sup>124</sup>**

<sup>123</sup> Home Office, Police Recorded Crime (PRC). Recorded crime by key offences, 2003-2018 – districts. Available at: [www.eastsussexinfigures.org.uk](http://www.eastsussexinfigures.org.uk)

<sup>124</sup> Home Office, Police Recorded Crime (PRC). Recorded crime by key offences, 2003-2018 – districts. Available at [www.eastsussexinfigures.org.uk](http://www.eastsussexinfigures.org.uk)

3.14.44 In the most recent Place Survey, undertaken in 2008/09, over 90% of respondents felt safe outside in their local area during the day and over 60% said they felt safe outside after dark in their local area. This is the best of any of the districts in East Sussex<sup>125</sup>.

3.14.45 Residents were also asked whether they thought people from different backgrounds are getting on well together, and the overwhelming majority (83.8%) agreed that they were. Residents were also asked, as part of the survey, how strongly they felt they belonged to their immediate neighbourhood. Again, the vast majority said they felt strongly that they did belong (67.2%).

3.14.46 The survey also asked residents of the district how much of a problem they thought there was with people not treating each other with respect and consideration. There was a very positive response to this question with 78% of respondents stating that there was not a very big problem in this matter.

3.14.47 The above responses, although taken in 2008/09, indicate that the sense of community and community cohesion in the district is high, although there will always be pockets where this is not the case as with any area.

### **Key Sustainability Issues**

3.14.48 The key issues arising from the review of PPPs and baseline information relating to health and wellbeing are:

- Obesity and inactivity are issues within the district;
- When compared to the other East Sussex authorities, the crime rate has increased slightly;
- By 2032 there will be a significant increase in those aged over 65, which could bring a number of challenges;
- Those aged 65 with a disability or long term illness is also likely to significantly increase adding further demands on the social care system. There will also be an increase in the younger age groups of 0-17 year olds. An increase is also expected in 18-64 year olds with a disability or long term illness;
- Rise in single person households, particularly in the older age groups, can lead to feeling of social isolation and loneliness which can impact negatively on people's health and wellbeing;
- Just over two thirds of households in the district have access to a GP surgery within 15 mins by public transport or walking;
- The proportion of people within the district who walk for leisure at least 10 minutes 5 or more times a week is relatively high
- The proportion of people within the district who cycle for leisure at least 10 minutes 5 or more times a week is extremely low. This may indicate the lack of appropriate cycle infrastructure.

### **Likely evolution without the Local Plan**

3.14.49 The likely evolution without the Local Plan is:

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<sup>125</sup> Ipsos MORI for East Sussex County Council. Available at: [www.eastsussexinfigures.org.uk](http://www.eastsussexinfigures.org.uk)

- Pressure on the districts social care and medical infrastructure from increases in the population with a disability or limiting long term illness, particularly in the over 65 age group;
- Certain areas of the population may be overlooked in terms of services and facilities;
- Levels of obesity within the population continue to rise;
- The uptake of cycling for leisure will remain low;
- Walking and cycling infrastructure provision/improvement continues to be lacking;
- Rates of certain crimes could increase;
- Residents sense of safety and community cohesion could decline; and
- Significant increases in housing and other developments may increase levels of crime.

### **Possible Local Plan/Policy Approach to sustainability issues**

3.14.50 The possible Local Plan/Policy approaches to the sustainability issues are:

- When looking at the spatial strategy and levels of development for the district, the Local Plan should ensure that enough health care facilities are provided and that there is comprehensive transport to health centres and facilities throughout the district;
- Delivering more open space, children's playgrounds and leisure facilities as part of development and the overall spatial strategy could help increase levels of physical activity within the districts population;
- The Local Plan may need to consider specific health care provision for certain age groups i.e. the over 65's;
- The Local Plan should consider delivering policies designed to improve walking and cycling infrastructure as well as public transport to encourage people to lead healthier lives;
- Noise management policies should be considered for the district particularly given its rural nature and this can affect health and wellbeing;
- Consider opportunities to design in safe and accessible walking and cycling networks to new housing developments. This could then help support and encourage the proportion of residents who walk and cycle in the District. This could have beneficial impacts on health and wellbeing, obesity, reducing emissions and sustainable transport;
- The Local Plan should ensure that the Councils Health and Wellbeing Strategy 2017-2020 (and any subsequent update to this) is taken into account in its approach, as well as the aims and objectives of the Corporate Plan in regards to health and wellbeing;
- Use of design and layout policies to ensure safe, healthy and inclusive developments are brought forward; and
- Consider whether the number of takeaways in town centres can be restricted.

## **Sustainability Appraisal Objectives**

3.14.50 In order to address these sustainability issues, there should be sustainability appraisal objectives dealing with:

- Creating healthy, safe and inclusive communities/environments;
- Facilitating better walking and cycling infrastructure
- Climate change impacts;
- Access to facilities and services including leisure and open spaces; and
- Protecting and enhancing the countryside, landscape, and open space.



### 3.15 Leisure, Recreation and Open Space

#### Relevant Plans, Policies and Programmes (PPPs)

3.15.1 Many of the PPPs relating to leisure, recreation and open space are closely linked to those on health and wellbeing.

3.15.2 It is worth noting that Goal 11 of the UN Resolution 2015 Transforming our world: the 2030 Agenda for Sustainable Development (2015) has as one of its targets that by 2030 there will be the provision of universal access to safe, inclusive and accessible, green and public spaces, in particular for women and children, older persons and persons with disabilities. This is also relevant to 'Health and Wellbeing'.

#### European

3.15.3 At the European level, the following PPPs may have a bearing indirectly on leisure, recreation and open space :

- **European Environmental Noise Directive (2002)** - Sets out a hierarchy for the avoidance, prevention and reduction in adverse effects associated with environmental noise, including noise generated by road and rail vehicles, infrastructure, aircraft and outdoor, industrial and mobile machinery;
- **European Air Quality Framework Directive (1996) and Air Quality Directive (2008)** - Puts in place measures for the avoidance, prevention, and reduction in harmful effects to human health associated with ambient air pollution and establishes legally binding limits for the most common and harmful sources of air pollution. Improvements to air quality will make outdoor leisure and recreation, including in open spaces, more enjoyable and healthier;
- **European Floods Directive (2007)** – Provides a framework for the assessment and management of flood risk, which could impact on the types of open spaces pursued i.e. they may be 'multi-functional' serving both a recreational purpose and a flood mitigation purpose.

#### National

3.15.4 The government's 25 Year Environment Plan (2018) has as one of its aims to connect people with the environment in order to improve health and wellbeing and one way in which it seeks to achieve this is by helping people to use green spaces. It also seeks to encourage children to be close to nature, in and out of school, with particular focus on disadvantaged areas. The Plan recognises and acknowledges that access to and time spent in outdoor green/open spaces can help improve mental and physical health and wellbeing.

3.15.5 Natural England developed the Accessible Natural Greenspace Standard (ANGSt), which recommends that everyone, wherever they live, should have accessible natural greenspace:

- Of at least two hectares in size, no more than 300 metres (five minutes' walk) from home;
- At least one accessible 20 hectare site within two kilometres of home;
- One accessible 100 hectare site within five kilometres of home;
- One accessible 500 hectare site within ten kilometres of home; and
- A minimum of one hectare of statutory Local Nature Reserves per thousand population.

3.15.6 ANGSt is a powerful tool in assessing current levels of accessible natural greenspace and planning for better provision. But it needs the right mapping tools to apply these standards, and see exactly where greenspaces are in relation to households.

3.15.7 In terms of leisure, recreation and open space, the NPPF (2019) contains most of its policy requirements in Chapter 8. This clearly demonstrates the link the NPPF gives to leisure, recreation and open space provision and the promotion of healthy and safe communities. The parts of Chapter 8 specifically relevant to leisure, recreation and open space are extracted below:

- *Planning policies and decisions should aim to achieve healthy, inclusive and safe places which... enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling (para 91c)*
- *To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should... plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments (para 92a)*
- *Take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community (para 92b)*
- *Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate (para 96)*

3.15.8 The NPPF also makes it clear that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless an assessment has been undertaken that clearly shows the facility is surplus to requirements; the loss would be replaced by equivalent or better provision in terms of quality and quantity and in a suitable location or the development is for alternative provision and the benefits of it outweigh the loss of the current facility.

3.15.9 Furthermore, planning policies should protect and enhance public rights of way and enable the designation, as appropriate, of land as local greenspace (through a local plan or neighbourhood plan).

3.15.10 The impact of Covid-19 and the subsequent restrictions put on people's lives has had a profound effect on levels of physical activity and this links back to issues on health and wellbeing (see section 3.14). Shortly after the government issued guidance on social distancing and limiting people to one piece of outdoor exercise a day, Sport England commissioned regular surveys of the English public during the initial 8 weeks of lockdown to assess their activity levels and attitudes towards physical activity. The research also included the ways people kept active and whether they did it solo, or with other members of their household. Since the initial 8 weeks of lockdown, Sport England have continued with ad-hoc surveys at key points, such as the weekend the majority of indoor sport and physical activity facilities were allowed to reopen. The findings of these surveys can be found on Sport England's website<sup>126</sup>.

3.15.11 Some of the key headlines of the surveys over the 12 week period are:

- The vast majority of respondents 'agreed' or 'strongly agreed' that they undertook exercise to help manage their mental health;
- During the first 8 weeks of lockdown activity levels held up relatively well with a third of adults surveyed doing 30 mins or more of physical exercise (at a level that raised their breathing rate) on five or more days a week;
- In week 9 (19-22 June) as restrictions eased across the country and schools and workplaces reopened, just 30% of adults achieved five or more bouts of 30 minutes of physical activity. Children's physical activity levels were also lower with 12% doing nothing, and just 14% doing an hour or more;
- In week 10 (10-14 July) with pools, gyms and leisure centres still closed but other options now available, walking and homebased activity remained the most popular activities. However, exercise continues to play a vital role in helping people manage their physical and mental health and wellbeing. Positive trends are emerging as 53% of people saying they intend to walk at least once a month once restrictions are lifted – up from 49% walking pre-coronavirus.
- In week 11 (31 July – 3 August) as indoor facilities are allowed to open, regular physical activity levels remained unchanged but big activities see slight dips in participation. Walking, cycling, running and home activities fall for the second survey in succession, as other facilities and society as a whole continues to open up. However, children's activity levels are up slightly over the levels recorded in weeks nine and 10, with a potential cause being the increase in free time as a result of school holidays. Two thirds of those who didn't visit an indoor facility said they were unlikely to visit one within the next 28 days.
- In week 12 (11-14 September) life began to return to something resembling the pre-coronavirus norm, with more people back at their place of work and children back in school and adult physical activity settled at a lower level

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<sup>126</sup> <https://www.sportengland.org/know-your-audience/demographic-knowledge/coronavirus?section=research>

compared to the initial lockdown period. Whilst activity in the home fell, the proportion of people walking and cycling for any reason increased. However, with schools reopening, 15% of adults reported their children doing no weekday activity outside of school hour, but more parents reported their children doing more activity in the past week than in a typical week during the initial lockdown period.

## Local

3.15.12 The provision of good quality open spaces and opportunities for sport, leisure and recreation provide an important contribution to the health and well-being of the district's communities. They can also provide cultural, ecological and landscape functions. On a more social level, sport and recreation facilities can also promote community cohesion and can encourage community development. The leisure sector, including tourism, also provides an important economic function.

3.15.13 Within the district, Town and Parish Councils have traditionally been responsible for the provision of open space, sports and recreation facilities including children's and youth play facilities, recreation grounds, allotments and other facilities. Indoor recreational and sports facilities are concentrated in the leisure centres managed by the District Council through Freedom Leisure at Uckfield, Heathfield, Hailsham and Crowborough.

3.15.14 Promoting health and wellbeing is a key issue for the District in relation to sports, leisure and physical activity, as some sectors of the community face particular barriers to access such as disabled people; children and young people; households in the more isolated rural areas and those in the more deprived urban areas.

3.15.15 The Council's Community and Regeneration Team are working on a number of reviews and strategies i.e. leisure provision review, the Cuckoo Trail Strategy and Intergenerational Report that may impact on the Local Plan. Any recommendations from these papers will be incorporated into the Local Plan and SA as necessary. .

3.15.16 Sport England's, Strategic Planning Outcomes Guidance (SPOG) is essentially a framework for determining the types of interventions which will have the maximum impact in delivering against the councils own outcomes and objectives and is the process Sport England require to make investment decisions. It was developed and published in 2019. Discussions are underway with Sport England for Wealden District Council to begin work, following their guidance to look at its current service and how it may differ in the future.

3.15.17 Local Cycling and Walking Infrastructure Plans (LCWIPs) were identified within the Department for Transport Cycling & Walking Investment Plan (CWIP), which was published in 2017. They enable local authorities to use a strategic approach in identifying cycling and walking infrastructure. Whilst these are not mandatory documents for local authorities to develop, the DfT has indicated that they are likely to support applications for future funding from government grants and other sources of funding.

3.15.18 ESCC has worked with local stakeholders, including the district and borough councils, the South Downs National Park and local cycling, walking and access groups in the development of the East Sussex Local Cycling & Walking Infrastructure Plan (LCWIP). ESCC published the consultation with key external stakeholders on 22 April 2020 until 6 June 2020. Conversations have taken place between WDC and ESCC with WDC agreeing to participate in the consultation process. A public consultation is due to take place later this year.

3.15.19 Active Sussex<sup>127</sup> is one of 49 County Sports Partnerships in England and is largely funded by the Government to co-ordinate and facilitate the delivery of sport and physical activity initiatives across Sussex. Their purpose is to help drive improved access to, and an increased participation in, sport and physical activity in Sussex. Wealden is a part of this partnership and people can use the website to find activities and local clubs near them.

3.15.20 The Council's Playing Pitch and Outdoor Sports Needs Assessment (2018) provides an assessment of all available outdoor sports pitches/courts including football, rugby, cricket, hockey, as well as bowls, tennis and netball. The assessment evaluates:

- the current trends in participation and needs of different users;
- provides an audit of all existing pitches in regards to quality and access;
- analyses the adequacy of provision to meet both current and projected need;
- identifies key priorities and actions for the Council;
- identifies areas for creating new pitches, pitches that need improvements and pitches that may be surplus to requirements; and
- provides clear recommendations and an action plan to address the identified issues

3.15.21 The Wealden Indoor Built Sports Facility Needs Assessment (2016) provides an audit of existing indoor and outdoor leisure facilities within the Council's administrative area, an assessment of those facilities in terms of quantity, quality and accessibility, and to identify gaps in provision as a guideline for future investment.

3.15.22 The Open Space Study (2017) and the Green Infrastructure Study (2017) provide a robust assessment of needs and deficiencies in open space in order to establish local provision standards. The Green Infrastructure Study looks at all types of green space and green assets, not just open space or sports facilities, and provides an assessment at the district, sub district and town level. It also provides a proposed Green Infrastructure Network along with green infrastructure standards and principles.

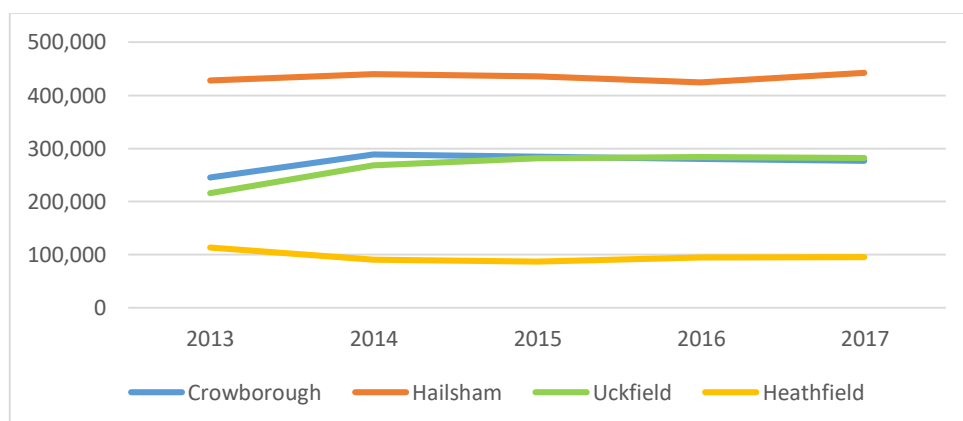
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<sup>127</sup> <https://www.activesussex.org/>

## **Baseline and Trends**

### **Leisure**

3.15.23 Freedom Leisure operates four centres in Crowborough, Hailsham, Heathfield and Uckfield on behalf of Wealden District Council. On average, just under 1.1m people per annum visit the four centres. Figure 20 shows the split between the centres between 2013 and 2017.



**Figure 20: Annual leisure center attendance figures<sup>128</sup>**

3.15.24 A number of reports have identified there is a deficiency in most sport facilities within Wealden, including:

- Wealden District Council’s Playing Pitch and Outdoor Sport Needs;
- Wealden District Council’s Open Space Study Assessment;
- Wealden District Council’s Indoor/ Built Sports Facility Needs Assessment;
- The Football Association’s Playing Pitch Strategy; and
- Sport England’s Active Places data - which identified a deficiency of sports hall and swimming provision in Wealden (see Table 13).

<b>Facility</b>	<b>Current facilities</b>	<b>National Standard</b>
Swimming	900 square metres of water space in community use.	National comparative data suggest an appropriate level of provision should be 1593sqm, a deficit of 693sqm.
Sports halls	The district currently has the equivalent of 40 courts within sports hall that are available for some level of community use.	National comparative data suggest an appropriate level of provision should be 41 courts (10.3 sports halls).

<sup>128</sup> Source: Freedom Leisure Scoping Paper 2019. Provided by Wealden Community and Regeneration Officers (April 2020)

Facility	Current facilities	National Standard
Health and Fitness Suites	It is estimated that only 226 of the 504 health & fitness stations are easily available for community use on a pay and play basis and at public centres (leisure centres and community schools).	This equates to 1.4 stations per 1000 population in 2016, lower than the recommended average.

**Table 13: Freedom Leisure Scoping Report 2019**

3.15.25 A review of leisure provision in Wealden in 2019 by Strategic Leisure Ltd undertook stakeholder consultation and used existing data from a number of studies to review the local need, existing leisure provision and current operational performance of Wealden’s leisure providers. A number of recommendations are made within the review. These will be incorporated into the SA and Local Plan process as appropriate.

### Sport

3.15.26 Consistent with the relatively high levels of affluence enjoyed by local residents, rates of regular participation in sport and active recreation are generally higher, and often significantly higher in the district than the national averages. However, this can mask significant differences between different parts of the district.

3.15.27 The level of physical activity of children is very important, particularly given the issues around obesity and weight management in children. Increasing levels of physical activity will help reduce the obesity levels of children within the district. The Active Lives Children and Young People Survey carried out throughout the school year by Active Sussex, asks children aged between five and 16 years old about how much physical activity they take part in, both in and out of school.

3.15.28 In Wealden in 2018/19, 53% of children surveyed stated they were ‘Active’ across the week, meaning they did an average of 60 minutes of exercise per day. This is a significant increase on the 2017/18 survey results of just 36% and is comparable to the proportion in East Sussex who were ‘Active’ (52%) and nationally ‘Active’ (47%) in 2018/19<sup>129</sup>.

3.15.29 There has also been a significant decrease in the proportion of children who are ‘Less Active’ in Wealden (doing less than an average of 30 minutes exercise per day) with only 24% coming into this category in 2018/19 compared to 39% in 2017/18<sup>130</sup>.

<sup>129</sup> <https://www.activesussex.org/funding-insight/insight/active-lives-children-and-young-people/>

<sup>130</sup> <https://www.activesussex.org/funding-insight/insight/active-lives-children-and-young-people/>



3.15.30 According to Sport England's Active Lives Survey, in May 2018-May 2019 just over 62% of the adult population<sup>131</sup> in Wealden participated in the recommended level of 150 minutes or more of physical activity<sup>132</sup> per week and were classed as being 'Active'. Table 14 shows the figures for each category and the percentage change since 2015. It should be noted however that there are areas of the district with lower activity levels i.e. Hailsham, Polegate, Pevensey and certain parts of Uckfield and Crowborough.

Year	Active - 150+ minutes a week (%)	Fairly Active - 30-149 minutes a week (%)	Inactive - <30 minutes a week (%)
Nov 15-Nov 16	68.6	11.3	20.2
May 17-May 18	61.3	15	23.7
May 18-May 19	62.6	12.6	24.8
Change from Baseline - Nov 15/16 (%)	-6	1.3	4.6
Change in last 12 months (%)	1.3	-2.4	1.1

**Table 14: Sport and Physical Activity Levels (adults aged 16+) - Wealden<sup>133</sup>**

3.15.31 It is important to note that whilst the percentage of the districts adult population in the 'Active' category is high, it has decreased since 2015 whereas the other two classifications have increased their percentages. However, the trend over the last 12 months has shown the reverse and according to the Wealden District Area Summary (2018) from the JSNAA, Wealden has the highest percentage of adults achieving 150 minutes physical activity per week of all districts and boroughs in East Sussex<sup>134</sup>.

3.15.32 Table 15 shows the percentage of respondents in May 2018 – May 2019 broken down by age group and levels of physical activity.

Age	Inactive	Fairly Active	Active
16-34	0	0	0
34-54	0	0	71.62
55-74	15.69	17.69	66.61
75+	48.86	0	36.53

**Table 15: Active Lives Local Data May 18/19 - Wealden<sup>135</sup>**

<sup>131</sup> Those aged 16 years +

<sup>132</sup> Physical activity here includes walking, cycling, dance, fitness and sporting activities but excludes gardening which is outside of Sport England's remit.

<sup>133</sup> Sport England Active Lives Survey. Table 3 Sport and Physical Activity Levels (adults aged 16+) by Local Authority Available at: <https://www.sportengland.org/know-your-audience/data/active-lives/active-lives-data-tables>

<sup>134</sup> <http://www.eastsussexjsna.org.uk/JsnaSiteAspx/media/jsna-media/documents/scorecards/2018/Area%20Summaries/LA%20View/LA-Area-Summary---Wealden-2018.pdf>

<sup>135</sup> Sport England Active Lives Survey. Active Lives Local Data May 18/19 – Age. Available at <https://www.sportengland.org/know-your-audience/data/active-lives/active-lives-data-tables>

3.15.33 It is interesting to note that the percentage for the older age groups is relatively high indicating that the older population still likes to remain physically active in some form.

3.15.34 The Council's Playing Pitch and Outdoor Sports Needs Assessment (2018) identified some level of deficiency in either quantity, quality or both. The Council will be updating the assessment to inform the new Local Plan but it is likely to remain that pitch provision needs to be improved within the district, particularly in the south.

3.15.35 One specific area is football, with the Football Association's Local Football Facilities Plan (LFFP) identifying a number of opportunities to accurately target investment in football facilities across the district. The LFFP identifies a programme of 13 priority projects for potential investment within the district including 3G pitches, improved grass pitches, changing rooms, pavilions / clubhouses and small-sided facilities<sup>136</sup>.

3.15.36 In terms of indoor sports facilities, there are four operating in the District which have the character of community leisure centres and are managed by a Trust (Freedom Leisure)<sup>137</sup>:

- Uckfield Leisure centre (wet and dry);
- Heathfield Leisure centre (dry only);
- Hailsham Leisure centre (wet and dry but no sports hall); and
- Crowborough Leisure centre (wet and dry).

3.15.37 Uckfield and Heathfield are owned by East Sussex County Council; Hailsham is owned by Wealden District Council and Crowborough Town Council own Crowborough. The centres at Uckfield and Heathfield are 'dual-use' sites meaning they are used by the colleges and community, with limited public access of some areas during term time. The contract for Hailsham and Crowborough Leisure Centres expires in 2027 and the contract for Uckfield and Heathfield Leisure Centres expires in 2022.

3.15.38 Some of the larger independent schools in the district have very impressive built sports facilities. Whilst these can sometimes be available for outside use by clubs and organisations, their primary function is to meet the needs of the school, and they are used for that purpose for long hours throughout the week.

3.15.39 The household survey conducted as part of the Wealden Indoor Built Sports Facility Needs Assessment (2016) highlighted that Sport and Leisure Centres are used regularly by significant numbers. The survey indicated that the majority of respondents used sports halls and swimming pools on a regular basis, and roughly 60-70% indicated that they were prepared to travel up to around 15 minutes to use such facilities, and the most popular mode being by car.

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<sup>136</sup> For further details see: <https://localplans.footballfoundation.org.uk/local-authorities-index/wealden/wealden-local-football-facility-plan/>

<sup>137</sup> Table 3.1 on page 21 of the Wealden Indoor Built Sports Facility Needs Assessment (2016) provides details of the facilities available at each of the leisure centres  
[https://www.wealden.gov.uk/UploadedFiles/Wealden\\_Indoor\\_Built\\_Sports\\_Facility\\_Needs\\_Assessment.pdf](https://www.wealden.gov.uk/UploadedFiles/Wealden_Indoor_Built_Sports_Facility_Needs_Assessment.pdf)

3.15.40 The assessment found that provision of new or redeveloped leisure centres was going to be most needed within the south of the district in the Hailsham and Polegate areas.

3.15.41 The Council will be undertaking a refresh of the Wealden Indoor Built Sports Facility Needs Assessment (2016) very soon as part of the evidence base for the new Local Plan and this may result in a different conclusion to that of the 2016 Assessment. However, leisure centre provision, including sports halls and swimming pools, will continue to be an important consideration of any planned growth for the district.

### Open Space

3.15.42 As part of the Wealden Open Space Study (2017) community consultation revealed that in the main the majority of households thought that there were enough open spaces and outdoor sport facilities, however there were three open space typologies where the majority of respondents suggested there is a general need for more – facilities for teenagers, natural green spaces (wildlife areas, nature reserves etc.) and informal open spaces (for ball games, picnics, hobbies, dog walking etc.). The community consultation also revealed that over a third of households rated the quality of Multi Use Games Areas (MUGAs) as poor or worse but that between 50%-60% of respondents highly rated the quality of country parks, natural green spaces, footpaths, bridleways, cycle paths, parks and recreation grounds. This highlights the importance residents place on these types of open space.

3.15.43 In terms of access, the Study found that at least 50% of households are willing to travel 16 minutes or more to visit country parks, natural green spaces, outdoor bowling greens, artificial turf pitches and water recreation facilities. However, a significant number of respondents felt facilities such as play areas, allotments and informal open spaces needed to be much more locally accessible.

3.15.44 The Study found that there is a deficiency of at least one type of open space in each Parish in the district. There are also accessibility and quality deficiencies where either additional provision could be provided or existing facilities could be improved. Whilst quantity, quality and access to provision will differ across the district the priorities for future provision in the district are as follows:

- To provide additional open space across the district, prioritising those areas with an existing deficiency in provision and towns or villages where an increase in population arising from development will result in additional pressure on existing facilities or a quantity deficiency of provision, either now or in the future;
- To improve access to a good range of open space, sport and recreation provision for all age groups through locating new facilities in an acceptable proximity to where people live or providing additional open space and associated facilities in locations that would improve accessibility to open space; and

- To improve and enhance existing open space, sports and recreation provision in relation to the quality and value of sites.

3.15.45 The Open Space Study also provides quantity and accessibility standards for new facilities, as well as recommendations to ensure good quality provision and these are highlighted in Table 16. Please see the full Open Space Study on the Council's website<sup>138</sup> for further specifics of the work.

Typology	Quantity standard (ha per 1,000 population)	Access Standard for new provision
Allotments	0.15	600m / 12-13 min walk
Amenity green space	1.0 (includes Natural Green Space)	600m / 12-13 min walk
Parks and recreation grounds including sports pitches	1.4	600m / 12-13 min walk
Children's play space	0.03	480m / 10 min walk
Youth play space	0.02	600m / 12-13 min walk
Natural green space	N/A	<ul style="list-style-type: none"> <li>• 20 hectare site within 2 km of home;</li> <li>• 100 hectare site within 5km of home; and</li> <li>• 500 hectare site within 10km of home</li> </ul>
Churchyards and cemeteries	N/A	N/A
Golf courses and fishing lakes	N/A	N/A

**Table 16: Summary of open space standards from the Open Space Study (2017)**

### **Key Sustainability Issues**

3.15.46 The key issues arising from the review of PPPs and baseline information relating to leisure, recreation and open space are:

- There are a number of areas within the district where deficiencies in open space, sport, leisure and recreation facilities have been identified, some are quite significant;
- Whilst activity levels throughout the district are above the national average, obesity levels remain high especially amongst adults;
- There are indications that relatively high proportions of older people in the district are 'Active' in undertaking physical activity, however generally activity levels decline as we age and this will have significant challenges as Wealden's population ages further; and
- There are various studies and strategies either underway or in the pipeline and it will be key for these to feed into the Local Plan process.

<sup>138</sup> [https://www.wealden.gov.uk/UploadedFiles/WLP\\_Evidence\\_Base\\_Open\\_Space\\_Study\\_Sept\\_2017\\_.pdf](https://www.wealden.gov.uk/UploadedFiles/WLP_Evidence_Base_Open_Space_Study_Sept_2017_.pdf)

### **The Likely evolution without the Local Plan**

3.15.47 The likely evolution without the Local Plan is:

- Delays in improvements to sport, leisure, recreation and open spaces;
- Provision of open spaces fails to meet standards and the provision of quality leisure facilities and provision does not expand in line with expected population and housing growth;
- Piecemeal approach to development due to lack of strategic co-ordination between plans and strategies; and
- Lack of infrastructure to support sport, leisure, recreation and open spaces.

### **Possible Local Plan/Policy Approach to sustainability issues**

3.15.48 The possible Local Plan/Policy approaches to the sustainability issues are:

- Development should be planned in such a way as to encourage healthier lifestyles i.e. safe walking provision, play spaces etc. so that children can be directed towards a healthier way of living. This will also be beneficial for the population as a whole;
- Local Plan policies and priorities should take account of the other work being undertaken on health and wellbeing and work together to achieve positive outcomes i.e. promoting and facilitating opportunities to enjoy the countryside and open space;
- The Local Plan and policies should consider improving access and affordability for all to services and facilities i.e. sports and leisure where possible;
- Where necessary and deliverable, sports facilities could be accounted for within the Local Plan;
- Types of facilities should be considered to accommodate the older population who wish to remain active as well as for younger age groups; and
- The Local Plan and policies should consider the provision of green space as part of development and the wider spatial strategy and also look to improve access to this to improve people's health and wellbeing.

### **Sustainability Appraisal Objectives**

3.15.49 In order to address these sustainability issues, there should be sustainability appraisal objectives dealing with:

- Facilitating better walking and cycling infrastructure
- Climate change impacts;
- Access to facilities and services including leisure and open spaces; and
- Protecting and enhancing the countryside, landscape, and open space.

## 3.16 Education and Qualifications

### Relevant Plans, Policies and Programmes (PPPs)

#### International

3.16.1 At the international level, the following PPP is relevant to education and qualifications:

- UN Resolution 2015 Transforming our world: the 2030 Agenda for Sustainable Development (2015).

3.16.2 The Agenda has at its heart a universal call to action to end poverty, protect the planet and improve the lives and prospects of everyone. The 17 Goals it sets out, and which were adopted by all UN Members in 2015 as part of the 15 year plan to achieve them, includes Goal 4 which states that it will ensure inclusive and equitable quality education and promote lifelong opportunities for all.

#### National

3.16.3 The NPPF (2019) outlines that strategic policies should set out an overall strategy for the pattern, scale and quality of development and make sufficient provision for community facilities, including educational facilities. This includes making sure that Local Plans set out the contributions required from developments towards infrastructure, such as that needed for education i.e. schools.

3.16.4 With specific reference to schools, the NPPF requires that local authorities take a proactive, positive and collaborative approach to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities, and that to achieve this they must work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted. According to the NPPF, local authorities need to, through the preparation of plans and decisions on applications, give great weight to creating, expanding or altering schools.

3.16.5 Planning policies should also support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for activities such as attending school.

#### Local

3.16.6 At the local level, East Sussex County Council is responsible for education provision, working in partnership with Wealden District Council in its area to ensure the educational needs of development coming forward in the district can be sufficiently accommodated.

3.16.7 The East Sussex County Council School Organisation Plan (2019-2023)<sup>139</sup>, identifies that some parts of the county, most notably for Wealden, the Hailsham

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<sup>139</sup> [https://www.eastsussex.gov.uk/media/14244/schoolorganisationplan\\_2019\\_2023\\_finaloctober2019.pdf](https://www.eastsussex.gov.uk/media/14244/schoolorganisationplan_2019_2023_finaloctober2019.pdf)

area, are likely to see demand for primary school places rising in the medium term. It also notes that recent high numbers in primary schools are now being reflected in rising Year 7 secondary school intakes. Year 7 numbers are predicted to peak around 2022/23 or 2023/24. As a result of rising numbers there will be a need to provide additional secondary school places in some areas of the county, most notably for Wealden, in Willingdon and Hailsham.

## **Baseline and Trends**

### **Education**

3.16.8 On average, Wealden has higher educational attainment for pupils at ages 5, 11 and 16 than the East Sussex average (significantly higher for pupils at age 11). However, it should be noted, that it is not possible to determine whether statistically significant differences exist between different areas' GCSE attainment scores (pupils at age 16)<sup>140</sup>.

3.16.9 Anecdotally, looking at a small number of school websites, this shows the disparity between schools within Wealden<sup>141</sup>:

- 100% of GCSE entries at Mayfield Girls School achieved A\*-C equivalent grades;
- 78% of students at St Bede's in Hailsham achieved grades 5-9 across all subjects, the equivalent of A\*-B; and
- 27% of Hailsham Community College students achieved a grade 5 and above in English and Maths.

### *Primary and Secondary Schools*

3.16.10 In 2016, just over 71% of primary school children (aged 5-10) had access to their school within a 15 minute walk or by public transport. For cycling this was 89.8% and by car 100% of primary school children had access within 15 minutes. However, this does not necessarily translate into that percentage of children opting to use that mode of transport<sup>142</sup>. In 2014, the figures were 73.1%; 90.4% and 100% respectively.

3.16.11 For the same year, access to secondary schools within 15 minutes' walk or public transport was possible for only 19.9% of children aged 11-15. Cycling was possible for 48.9% of 11-15 year olds in 2016 and 82.6% had the possibility of using the car<sup>143</sup>. In 2014, the figures were 23%; 50.8% and 83.1% respectively.

3.16.12 The vast majority of the pupils attending the district's schools are from white ethnic backgrounds (95.2% in 2009/10), with the largest minority ethnic groups

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<sup>140</sup> Source: JSNA, 2016 - [www.eastsussexjsna.org.uk](http://www.eastsussexjsna.org.uk)

<sup>141</sup> These figures are taken from the schools website and so should not be referred to as official statistics. They are to give an indication of educational differences in the district.

<sup>142</sup> Department for Transport, Journey time statistics: Access to services 2016. Access to primary schools, 2014-16 - super output areas. Available at: [www.eastsussexinfofigures.org.uk](http://www.eastsussexinfofigures.org.uk)

<sup>143</sup> Department for Transport, Journey time statistics: Access to services 2016. Access to secondary schools, 2014-16 - super output areas. Available at: [www.eastsussexinfofigures.org.uk](http://www.eastsussexinfofigures.org.uk)



being pupils from mixed backgrounds (2.4%) and Asian backgrounds (0.9%). This reflects the districts ethnicity overall.

### *Further education*

3.16.13 In 2017/18, 5,470 people participated in further education, with 70% achieving their qualification. Table 17 details the levels of participation and achievement<sup>144</sup>.

<b>Participation</b>				
	<b>Total</b>	<b>Full level 2</b>	<b>Full Level 3</b>	<b>English and Maths</b>
Numbers	5,470	930	1,820	1,440
%	100.0	17.0	33.3	26.3
<b>Achieved</b>				
	<b>Total</b>	<b>Full level 2</b>	<b>Full Level 3</b>	<b>English and Maths</b>
Numbers	3,830	490	1,000	880
%	70.0	12.8	26.1	23.0

**Table 17: Further Education: learners, skills and achievements, 2017/18 Wealden<sup>145</sup>**

\* This table reports full-year numbers - a count of the number of learners that participated at any point during the year. Learners undertaking/achieving more than one course will appear only once in the 'total learners' category.

3.16.14 It is clear that the achievement rate is high in Wealden and is comparable to the national achievement of 72.9%.

### Apprenticeships

3.16.15 The number of residents in Wealden achieving apprenticeships has reduced since 2014/15 from 920 to 780 in 2017/18. This represents a 13.2% decrease. However, the number of advanced and higher level apprenticeships has increased, standing at 350 and 90 in 2017/18 compared to 340 and 40 in 2014/15 respectively<sup>146</sup>.

### Qualifications

3.16.16 Wealden has a high proportion of the workforce in professional and technical occupations. This reflects the high qualifications of the workforce and that the residents are generally highly skilled. This is also reflected in the percentage of the working age population occupying skilled trades.

<sup>144</sup> The data in Table 17 include achievements obtained while studying Apprenticeships, through Workplace Learning, Community Learning and while attending Education and Training Provision which includes General Further Education Colleges including Tertiary, Sixth Form Colleges, Special College - Agricultural and Horticultural Colleges and Art and Design Colleges, Specialist Colleges and External Institutions.

<sup>145</sup> Department for Education and Education and Skills Funding Agency. Further Education: learners, skills and achievements, 2005-2018 – districts. Available at: [www.eastsussexinfofigures.org.uk](http://www.eastsussexinfofigures.org.uk)

<sup>146</sup> Skills Funding Agency and Department for Business, Innovation & Skills, via GOV.UK website. Apprenticeship starts and achievements, 2005-2018 – districts. Available at: [www.eastsussexinfofigures.org.uk](http://www.eastsussexinfofigures.org.uk)

	Wealden		East Sussex	South East	England & Wales
	Number	%	%	%	%
Managers directors and senior officials	10,076	14.0	12.0	12.3	10.8
Professional occupations	12,284	17.1	16.5	18.7	17.4
Associate professional and technical occupations	9,635	13.4	12.4	13.8	12.7
Administrative and secretarial occupations	8,198	11.4	11.2	11.5	11.4
Skilled trades occupations	10,139	14.1	13.6	11.1	11.5
Caring leisure and other service occupations	7,173	10.0	11.3	9.3	9.4
Sales and customer service occupations	4,929	6.9	7.9	7.9	8.4
Process plant and machine operatives	3,355	4.7	5.5	5.7	7.2
Elementary occupations	5,966	8.3	9.5	9.7	11.2
<b>Total</b>	<b>71,755</b>	-	-	-	-

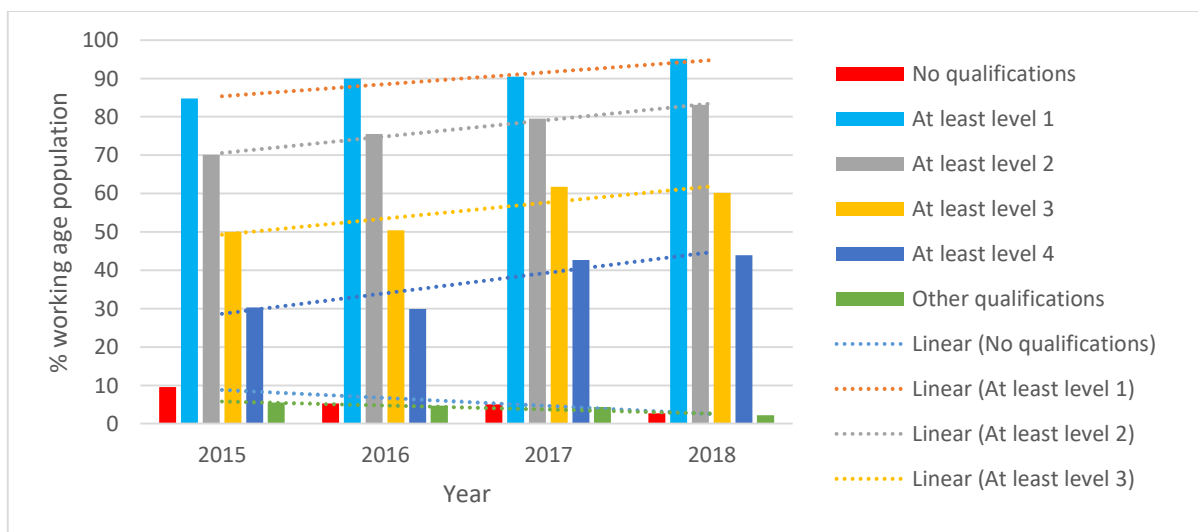
**Table 18: Occupations in Wealden, Census 2011<sup>147</sup>**

3.16.17 The level of qualifications within the district is high. In 2018, nearly 44% of the working age population have Level 4+ qualifications<sup>148</sup>, compared to 28.9% in 2011 and just over 60% have at least Level 3 qualifications<sup>149</sup>, compared to 12.2% in 2011. In addition, the percentage of the working age population with no qualifications has decreased dramatically from around 17% in 2011 to just 2.7% in 2018. Figure 21 highlights the improving trend in qualifications of the working age population in Wealden since 2015.

<sup>147</sup> Office for National Statistics (ONS), Table DC6604EW. Occupation by industry of employment in 2011 – wards. Available at: [www.eastsussexinfofigures.org.uk](http://www.eastsussexinfofigures.org.uk)

<sup>148</sup> Level 4+ qualifications include Degree (for example BA, BSc), Higher Degree (for example MA, PhD, PGCE), NVQ Level 4-5, HNC, HND, RSA Higher Diploma, BTEC Higher level, Foundation degree (NI), Professional qualifications (for example teaching, nursing, accountancy)

<sup>149</sup> Level 3 Qualifications include 2+ A levels, 4+ AS levels, Higher School Certificate, NVQ level 3, Advanced GNVQ, ONC, OND, BTEC National



**Figure 21: Qualifications of working age population in Wealden 2015-2018<sup>150</sup>**

3.16.18 The gross weekly earnings of residents in the district are, on average, around 2% higher than in East Sussex, although they are 11% lower than the South East average and 5.4% lower than the national average<sup>151</sup>. However, a highly qualified and relatively high earning population conceals the fact that there are those less fortunate: without work, with health problems, in fuel and housing poverty and those living in scattered pockets of relative deprivation across the district.

### **Key Sustainability Issues**

3.16.19 The key issues arising from the review of PPPs and baseline information relating to education and qualifications are:

- An increase in housing development could place pressure on the existing schools in terms of school places;
- Rising pupil numbers in Year 7 may result in a need to provide additional secondary school places in Willingdon and Hailsham particularly;
- There is a very low percentage of the working age population with no qualifications and a very high percentage with at least Level 4 qualifications. The districts working age population is generally highly qualified;
- There is, albeit anecdotally, a disparity in educational achievement in some of the district's schools;
- Wealden has a high proportion of the workforce in professional and technical occupations. This could narrow the employment base/opportunities for different businesses;
- There is a good percentage of the working age population in skilled trades;
- Overall, the numbers of people taking an apprenticeship has fallen; and
- High house prices could lead to shortage of lower paid and key workers (i.e. teachers, nurses etc.) living in the area.

<sup>150</sup> Annual Population Survey, Nomis/ONS. Qualifications of working age population, 2005-2018 – districts. Available at: [www.eastsussexinfofigures.org.uk](http://www.eastsussexinfofigures.org.uk)

<sup>151</sup> Annual Survey of Hours and Earnings (ASHE), Office for National Statistics (2019). Average (median) earnings, residence-based, 2002-2019 – districts. Available at: [www.eastsussexinfofigures.org.uk](http://www.eastsussexinfofigures.org.uk)

### **Likely evolution without the Local Plan**

3.16.20 The likely evolution without the Local Plan is:

- Sufficient school places may not be provided in the future;
- Development continues without a strategic approach to the provision of school places;
- Numbers taking apprenticeships continue to fall;
- Lack of vocational and apprenticeship opportunities; and
- Loss of well-educated population to other areas to find employment.

### **Possible Local Plan/Policy Approach to sustainability issues**

3.16.21 The possible Local Plan/Policy approaches to the sustainability issues are:

- Ensure that affordable housing targets are met including the provision of sufficient rented and shared ownership accommodation for both lower paid and key workers;
- Consider educational needs in developing strategic policies looking at accessibility to learning resources in new development and vocational courses i.e. in skilled trades; and
- That the Local Plan supports ESCC in relation to areas in the district where there is a need for more secondary and potentially primary school places and to ensure that the provision of school places is considered in relation to future housing growth and projections for education need.

### **Sustainability Appraisal Objectives**

3.16.22 In order to address these sustainability issues, there should be sustainability appraisal objectives dealing with:

- Improving levels of educational attainment and skills; and
- Delivering high quality employment opportunities.

## 3.17 Economy and Employment

### Relevant Plans, Policies and Programmes (PPPs)

#### International

3.17.1 At the international level, the following PPP is relevant to education and qualifications:

- UN Resolution 2015 Transforming our world: the 2030 Agenda for Sustainable Development (2015).

3.17.2 The Agenda has at its heart a universal call to action to end poverty, protect the planet and improve the lives and prospects of everyone. The 17 Goals it sets out, and which were adopted by all UN Members in 2015 as part of the 15 year plan to achieve them, includes Goal 8 which relates to promoting sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.

#### European

3.17.3 The Single Market Strategy is the European Commission's plan to unlock the full potential of the single market. The single market is at the heart of the European project, but its benefits do not always materialise because single market rules are not known or implemented, or they are undermined by other barriers. So the Commission has decided to give the single market a boost by improving mobility for service providers, ensuring that innovative business models can flourish, making it easier for retailers to do business across borders, and [enhancing access to goods and services throughout the EU](#).

#### National

3.17.4 The NPPF (2019) outlines that planning policies should 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.

3.17.5 Specifically, the NPPF (2019) states that Local Plans should:

- Encourage sustainable economic growth within their clear economic vision and strategy;
- Set criteria and identify sites for local investment to match community needs;
- Address investment barriers such as inadequate infrastructure, services/housing or poor environment; and
- Incorporate flexibility to account for unanticipated circumstances, allow new working practices and enable rapid responses to economic changes.

3.17.6 The NPPF (2019) also considers issues relating to supporting a prosperous rural economy and notes planning policies and decisions should enable:

- the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;
- the development and diversification of agricultural and other land-based rural businesses;
- sustainable rural tourism and leisure developments which respect the character of the countryside; and
- the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.

3.17.7 The Government's White Paper named 'Industrial Strategy: Building a Britain fit for the future' (November, 2017) sets out how the Government will help businesses create better, higher-paying jobs in every part of the United Kingdom with investment in the skills, industries and infrastructure of the future. It includes allocations within the National Productivity Investment Fund of £11.5bn for housing and £4.9bn for transport until 2022/23 (p130). 'Place' is a consideration within the strategy, with measures such as:

- agree Local Industrial Strategies that build on local strengths and deliver on economic opportunities; and
- create a new Transforming Cities fund that will provide £1.7bn for intra-city transport. This will fund projects that drive productivity by improving connections within city regions.

3.17.8 The Local Growth White Paper (2010) highlights the importance of economic policy that focusses on the delivery of strong, sustainable and balanced growth of income and employment over the long-term, growth which is broad-based industrially and geographically to provide equality of access and opportunity, and build businesses that are competitive internationally.

## Local

3.17.9 The South East Local Enterprise Partnership (LEP): Strategic Economic Plan (2014)<sup>152</sup> states that by 2021, the aim is to:

- Generate 200,000 private sector jobs, an average of 20,000 a year or an increase of 11.4% since 2011;
- Complete 100,000 new homes, increasing the annual rate of completions by over 50% compared to recent years; and
- Leverage investment totalling £10 billion, to accelerate growth, jobs and homebuilding.

3.17.10 The Economic Plan acknowledges that the A27 (within the A22/A27 Eastbourne-South Wealden Corridor) has suffered from a lack of investment meaning it is not fit for purpose for carrying long distance strategic traffic, nor for providing journey time reliability which is important for business in terms of the movement of people and goods and is inhibiting potential growth. Current activity

<sup>152</sup> [https://www.southeastlep.com/app/uploads/Strategic\\_Economic\\_Plan\\_2014.pdf](https://www.southeastlep.com/app/uploads/Strategic_Economic_Plan_2014.pdf)

identified in the plan is for the A27 Polegate and Lewes alignment and capacity improvements, which remains an aspiration identified in the ESCC Local Transport Plan 2011-2026. Further to this, the A27 has been identified as a RIS3 pipeline project in the Road Investment Strategy 2: 2020-2025 Report<sup>153</sup>.

3.17.11 The A22/A27 Growth Corridor will directly create 1,400 jobs by 20/21 and a further 800 jobs by 2021/25, it will also directly deliver 725 homes by 20/21 with a further 575 by 20/25. Transport schemes will facilitate 9,240 jobs and 17,800 homes by 2020/21. Note that (additionally) Polegate Innovation Park will deliver 175 homes 2019/20 – 20/21 and 525 homes by 2021/27.

3.17.12 Sites in the Wealden part of the Corridor include Land at Uckfield which could provide 12,000 sqm of business space and 10,000 sqm retail; Hailsham which could provide 8,650 sqm of employment space; Polegate where there is a site of 43.83 hectares with overall provision for 17,000 sqm business space; Maresfield which has full planning permission for 22,500 sqm of B1 space plus restaurants/ cafe area and Hailsham/Polegate/Willingdon where a mixed use development would provide 300 sqm retail with significant business space.

3.17.13 The LEP continues to lobby the Highways Authority on the need for the scheme to support economic growth on the A22/A27 Eastbourne/South Wealden to Brighton corridor and there has also been recent lobbying of the Department for Transport (DfT) Secretary of State at a local level in the Eastbourne area to confirm the need for the scheme to support the economic growth of the corridor.

3.17.14 The SELEP Local Industrial Strategy is based on evidence and aligned to the national Industrial Strategy. Local Industrial Strategies must set out clearly defined priorities for the area that will help to maximise its contribution to UK productivity and allow places to make the most of their distinctive strengths. The expectation of LEPs is set out in the Governments' policy prospectus. The Local Industrial Strategy has two core aims – to increase productivity and realise potential and allow all communities to contribute to and benefit from economic prosperity. Team East Sussex, which Wealden is a member of, has fed into this strategy. It will be built around 5 key pillars of Ideas, People, Place, Infrastructure and Business Environment<sup>154</sup>.

3.17.15 In line with the production of the Local Industrial Strategy, the Cultural and Creative sub group of SELEP have also commissioned a re-refresh of their prospectus. This will include Hailsham Aspires and the aspirations of this project.

3.17.16 The Coastal Communities sub group of SELEP have produced a prospectus to feed into the Local Industrial Strategy which Wealden was an active partner in – the prospectus will set out the issues facing coastal towns in the South East and makes the case for sustained investment in the coastal economies in the South East.

3.17.17 The South East Local Enterprise Partnership (SELEP) agreed its new Strategic Economic Plan 2019, outlining its priorities and aims to drive a more

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<sup>153</sup> Road Investment Strategy 2: 2020-2025 (Department for Transport, 2020).

<sup>154</sup> <https://www.southeastlep.com/our-strategy/local-industrial-strategy/>



productive and prosperous economy for the area over the next decade in December 2018. The document sets out how SELEP will help meet this challenge. It sets SELEP's ambitions for the south east economy and how we will achieve them: tackling housing shortages; relieving pressure on infrastructure and improving skills across the workforce. It includes a 5 year action plan intended to deliver on the Government's National Industrial Strategy and on a pathway towards a robust Local Industrial Strategy for the South East.

3.17.18 Skills East Sussex (SES) is the County strategic body for employment and skills. Skills East Sussex – Statement of Prioritise and Activity Plan (2017-2020) sets the aim to improve local employment and skills in order to increase economic prosperity in East Sussex. SES has identified a number of sectors and issues where it seeks to make a difference by working together. SES is committed to improving the delivery of skills for the engineering, construction, health and social care, creative, digital and media and land-based sectors.

3.17.19 The East Sussex Growth Strategy 2014-2020<sup>155</sup> sets out the vision for a more innovative, productive and faster growing East Sussex economy. The county has a unique offer to make to investors, businesses and skilled workers; one that blends inspiring coastline and countryside and a business base of likeminded companies in growing sectors of the economy. The Strategy is built around three pillars: Business, Place and People. Once the Local Industrial Strategy 2014-2020 has been finalised East Sussex County Council will be refreshing the current Growth Strategy.

3.17.20 Wealden District Council are currently in the process of reviewing the area's industrial estates to get a better understanding of the estates and options for future improvements, identifying commercial opportunities and ensuring they are fit for purpose moving forward. The review includes 19 older industrial estates in the District (excluding Swallow and Ashdown Business Park) and identifies detailed recommendations at four of our industrial estates including Diplocks in Hailsham, Hackhurst near Hailsham (the A22), Chaucer in Polegate and Farningham Road in Crowborough. The Council are currently finalising the report from the consultants and will be sharing with internal and external partners as appropriate.

3.17.21 Locate East Sussex<sup>156</sup> deliver the Council's inward investment service for businesses, which includes support for existing businesses in our District to grow/relocate. The Council funds the contract with ESCC and other District and Borough Councils across East Sussex.

3.17.22 There is work being undertaken by the Council on the development of flexible and cultural/creative workspace in the District. This feeds into work being done at county and regional level and will hopefully see the development of both flexible and creative/cultural workspace in the District. There are opportunities to develop both workspaces within the Hailsham Aspires project and also across the District. A number of flexible workspace options already exist in the District (e.g. Stones Throw at Crowborough). Clusters of creative industries will need to be

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<sup>155</sup> <https://www.eastsussex.gov.uk/media/1802/eastsussexgrowthstrategydec2014.pdf>

<sup>156</sup> [www.locateeastsussex.org.uk](http://www.locateeastsussex.org.uk)

identified and work undertaken to ascertain the need and opportunity for such spaces moving forward (this will likely feed into the economic strategy).

## **Baseline and Trends**

### **Income**

3.17.23 Over the past 10 years, the average (gross) weekly earnings of all residents within Wealden has increased by just over 23%. The part-time earnings have increased by just over 33%.

<b>Year</b>	<b>2009</b>	<b>2019</b>	<b>% change</b>
All employees	£369	£456	23.6
Full-time	£481	£594	23.5
Part-time	£160	£214	33.8

**Table 19: Average (median) earnings, residence-based – Wealden 2009 and 2019<sup>157</sup>**

### **Employment and Unemployment**

3.17.24 In 2018, the number of people in employment in Wealden was around 53,500<sup>158</sup>. Of these, 4,000 were working proprietors and 49,500 were employees. Of the 49,500 employees, the vast majority were full-time.

	<b>Total Employment</b>	<b>Working proprietors</b>	<b>All employees</b>	<b>Employees Full-time employees (%)</b>	<b>Employees Part-time employees (%)</b>
England	26,841,500	865,500	25,976,000	68	32
South East	4,285,000	134,000	4,151,000	66.4	33.6
East Sussex	192,500	11,000	181,500	61.7	38.6
Wealden	53,500	4,000	49,500	61.6	38.4

**Table 20: Employment status 2018<sup>159</sup>**

3.17.25 The employment sector in Wealden is dominated by those in public administration, education and health care industries, accounting for just over a fifth of all people employed in the district. The transport and storage sector makes up the smallest proportion of those employed within the district<sup>160</sup>. With the district being particularly rural in nature, it is somewhat surprising that only 5.6% of those employed work in the agriculture, fishing, mining and utilities sector. However, it is clear that tourism and hospitality industries are large employers, with around 10% of those employed in 2018 working in the accommodation and food services sector.

<sup>157</sup> Annual Survey of Hours and Earnings (ASHE), Office for National Statistics. Average (median) earnings, residence-based, 2002-2019 – districts. Available at: [www.eastsussexinfofigures.org.uk](http://www.eastsussexinfofigures.org.uk)

<sup>158</sup> Business Register and Employment Survey (BRES), ONS/Nomis. Employment status 2015-2018 – wards. Available at: [www.eastsussexinfofigures.org.uk](http://www.eastsussexinfofigures.org.uk)

<sup>159</sup> Business Register and Employment Survey (BRES), ONS/Nomis. Employment status 2015-2018 – wards. Available at: [www.eastsussexinfofigures.org.uk](http://www.eastsussexinfofigures.org.uk)

<sup>160</sup> Business Register and Employment Survey (BRES), ONS/Nomis. Employment by industry UK SIC (2007), 2015-2018 – districts. Available at: [www.eastsussexinfofigures.org.uk](http://www.eastsussexinfofigures.org.uk)

Wholesale and retail, including the motor trade is also a large employer, accounting for nearly 17% of those employed in 2018.

3.17.26 According to the Census 2011, a quarter of the working age population in Wealden held positions within lower management and professional occupations, which supports the dominance of employment within the public administration, education and health care industries and is higher than the county average (23%) and the national average (20.8%)<sup>161</sup>.

3.17.27 Wealden has a higher proportion of people with employment in management or business running occupations and there is a large proportion of the working age population in some form of management and professional role (37%). There is also a healthy proportion of people occupying small employer and own account roles (14.9%), indicating that small businesses and maybe working from home to be rising in importance<sup>162</sup>.

3.17.28 However, the district does have 2.7% of the working age population who have never worked or are long-term unemployed but this is less than half the national average which stands at 5.6%.

3.17.29 The number of unemployed people within Wealden decreased by 43% between 2009 and 2019. This has meant that the unemployment rate within Wealden is 2.5%, which is less than the national rate of 3.9%<sup>163</sup>. The number of people in the workforce in Wealden is projected to reach 83,368 in 2032, which is an 8% increase from the figure of 77,338 in 2017<sup>164</sup>.

3.17.30 The most recent data from the ONS shows that in March 2020, there were 1,335 people of working age (16-64 years old) claiming Job Seekers Allowance and Universal Credit who were unemployed<sup>165</sup>. This is a claimant rate<sup>166</sup> of 1.5% and compares very favourably with the national claimant rate of 3.1%; the regional claimant rate of 2.2% and the county claimant rate of 2.9%. The district has the lowest claimant rate of all the districts and boroughs in East Sussex.

3.17.31 In 2019, there were 73,600 economically active people in the district and 16,400 economically inactive people. Of the economically active population, the vast majority were employees (59.7%) but 18.8% were self-employed. This breakdown has remained relatively constant over the years<sup>167</sup>.

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<sup>161</sup> Office for National Statistics (ONS), Table KS613EW. Socio-economic classification in 2011 - super output areas. Available at: [www.eastsussexinfofigures.org.uk](http://www.eastsussexinfofigures.org.uk)

<sup>162</sup> Office for National Statistics (ONS), Table KS613EW. Socio-economic classification in 2011 - super output areas. Available at: [www.eastsussexinfofigures.org.uk](http://www.eastsussexinfofigures.org.uk)

<sup>163</sup> Model-based estimates of unemployment, Nomis/ONS. Unemployment estimates, 2004-2019 – districts. Available at: [www.eastsussexinfofigures.org.uk](http://www.eastsussexinfofigures.org.uk)

<sup>164</sup> East Sussex County Council (ESCC). Workforce projections by age group (dwelling-led), 2017-2032 – districts. Available at: [www.eastsussexinfofigures.org.uk](http://www.eastsussexinfofigures.org.uk)

<sup>165</sup> Office for National Statistics/NOMIS. Claimant Count including JSA and Universal Credit, 2018-2020 – wards. Available at: [www.eastsussexinfofigures.org.uk](http://www.eastsussexinfofigures.org.uk)

<sup>166</sup> The Claimant Rate is defined as the number of claimants resident in an area expressed as a percentage of the working age population resident in that area which includes all people aged 16-64

<sup>167</sup> Annual Population Survey/Labour Force Survey, NOMIS/ONS. Economically active and inactive population, 2004-2019 – districts. Available at: [www.eastsussexinfofigures.org.uk](http://www.eastsussexinfofigures.org.uk)

3.17.32 The economically inactive population of Wealden has also remained relatively constant, although it has reduced from a high of 19,300 people in 2015 to 16,400 people in 2019, a decrease of 15%<sup>168</sup>.

3.17.33 Job density within Wealden has also improved over the last 10 years, with a density of 0.65 in 2008 and a density of 0.73 in 2018<sup>169</sup>. This shows that there are 0.73 jobs for every resident of working age. A job density of 1 means that there is one job for every resident of working age and so the district figures are moving in the right direction.

3.17.34 Homeworking is also an important factor in the economic environment. In Wealden there were 10,452 homeworkers in 2011, with 58.8% being self-employed, the majority of which were full time (36.0%)<sup>170</sup>. The vast majority of all homeworkers (self-employed and employees) work in the financial, real estate, professional and administrative activities industry sector (27.3%). The second highest is the distribution, hotels and restaurants sector (15.5%) and public administration, education and health (15.3%)<sup>171</sup>.

3.17.35 It is interesting to note that in terms of occupations for homeworkers, the vast majority occupy manager, director or senior official roles (20%). This is followed by associate professional and technical occupations (17.7%) and skilled trade's occupations (17.2%).

#### Business start-ups and closures

3.17.36 As of 2018 Wealden, has 8,565 active businesses, which is an increase of 6% since 2008. However, in 2018 there were 720 business closures and only 690 business start-ups. This increase in business closures has come after years of increasing numbers in start-ups. Start-up businesses in 2015 for example stood at 870.

3.17.37 The situation over business start-ups and closures within the district is highlighted further in the new business registration<sup>172</sup> rate, which was 52.0 in 2018 compared to its highest rate of 74.3 in 2015. This compares to the national new business registration rate of 71.6 in 2018 and 73.4 in 2015<sup>173</sup>.

3.17.38 Data from the ONS however, indicates that the 5 year survival rate for new start-up businesses in Wealden is better than the average 5 year survival rate for East Sussex. The two most recent datasets for businesses are for the years 2012 and 2013. These show that almost 50% of business start-ups in Wealden survive 5

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<sup>168</sup> Annual Population Survey/Labour Force Survey, NOMIS/ONS. Economically active and inactive population, 2004-2019 – districts. Available at: [www.eastsussexinfofigures.org.uk](http://www.eastsussexinfofigures.org.uk)

<sup>169</sup> Nomis/Office for National Statistics. Jobs density, 2000-2018 – districts. Available at: [www.eastsussexinfofigures.org.uk](http://www.eastsussexinfofigures.org.uk)

<sup>170</sup> Office for National Statistics (ONS), Table DC6607EW. Home-workers by employment status in 2011 – districts. Available at: [www.eastsussexinfofigures.org.uk](http://www.eastsussexinfofigures.org.uk)

<sup>171</sup> Office for National Statistics (ONS), Census 2011, Tables DC6608EW1a and LC7602EW. Home-workers by industry of employment in 2011 - super output areas. Available at: [www.eastsussexinfofigures.org.uk](http://www.eastsussexinfofigures.org.uk)

<sup>172</sup> New business registration rate is the rate of new business registrations per 10,000 people aged 16 and over

<sup>173</sup> Office for National Statistics Business Demography tables. Business demography, 2004-2018 – districts. Available at: [www.eastsussexinfofigures.org.uk](http://www.eastsussexinfofigures.org.uk)

years, whereas the average for East Sussex is 46%<sup>174</sup>. This shows that the district is a more promising area to start new businesses in within East Sussex.

### Number of businesses

3.17.39 The total number of businesses has increased by 10% from 2009 to 2019, with the biggest increase in the education sector, which has increased by 43%. Information and communication (25%), property (24%), professional, scientific and technical (24%), and finance and insurance (22%) sectors have seen the next largest increases in businesses. However, the wholesale, retail, transport and storage industries have had a decrease in the number of active businesses in Wealden.

	<b>2009</b>	<b>2019</b>	<b>% change</b>
Total	<b>7,725</b>	<b>8,495</b>	<b>10.0</b>
Agriculture, forestry & fishing	625	745	19.2
Production	490	490	0.0
Construction	1,245	1,340	7.6
Motor trades	285	300	5.3
Wholesale	420	340	-19.0
Retail	555	520	-6.3
Transport & storage (inc postal)	145	130	-10.3
Accommodation & food services	345	350	1.4
Information & communication	520	650	25.0
Finance & insurance	115	140	21.7
Property	230	285	23.9
Professional, scientific & technical	1,200	1,490	24.2
Business administration & support services	630	720	14.3
Public administration & defence	25	35	40.0
Education	115	165	43.5
Health	240	260	8.3
Arts, entertainment, recreation & other services	540	540	0.0

**Table 21: Business enterprises by industry group UK SIC (2007), 2009-2019 – Wealden**

<sup>174</sup> Office for National Statistics, Business Demography Tables. Business survival rates, 2008-2017 – districts. Available at: [www.eastsussexinfigures.org.uk](http://www.eastsussexinfigures.org.uk)

## Employment floorspace

3.17.40 According to the Wealden AMR (2018/19), employment floor space (B-Class Uses) within the district has had a net increase of 8,511m<sup>2</sup>, with a net increase of 2,973m<sup>2</sup> employment floor space on previously developed land. Policy WCS1 (Provision of Homes and Jobs 2006 – 2027) of the Wealden Core Strategy Local Plan (adopted February, 2013) confirm that provision will be made for some net additional 40,000 sq. metres net employment floorspace (B1/B2/B8) to provide for 128,695 sq. metres net employment over the period 2006-2027.

3.17.41 However, there has been a net loss of office floorspace (Use Class B1a) largely to residential development in 2018/19 totalling 2,434sqm. Losses of some B Use employment floorspace to residential have been occurring for a number of years, with losses of office floorspace to residential increasing since 2014/15<sup>175</sup>.

Classification code	Use Class	2014/15	2015/16	2016/17	2017/18	2018/19
B	Mixed B Use Classes	0	-166	0	0	0
B1A	Offices	-77	-940	-830	-1,947	-2,434
B1B	Research and Development	-61	-771	0	0	0
B1C	Light Industry	-106	-1,259	0	0	0

**Table 22: Business floorspace lost to residential**

## Size of businesses

3.17.42 The vast majority of business enterprises in Wealden employ less than 10 people and are classified as micro businesses. In 2019, there were 7,760 micro businesses in the district, or 91.3% of the total business enterprises that year. This has been the case for a number of years and is greater than the national figure (89.6%); regional figure (90.2%) and county figure (90.4%). Micro businesses are therefore an important part of the Wealden business environment.

## Communications

3.17.43 The issue of access to superfast broadband is discussed further in Chapter 3.20, however it is relevant to include it here as with around 44% of businesses in Wealden functioning from rural areas and, as of 2018, 22% of the population working from home, the ability to connect to superfast broadband is an important part of the district's economy, especially where there are significant issues concerning transport links (please see paras 3.20.29 – 3.20.32).

## Key Sustainability Issues

3.17.44 The key issues arising from the review of PPPs and baseline information relating to the economy and employment are:

<sup>175</sup> Wealden District Council Monitoring

- Although employment floorspace has increased overall, there is pressure from housing and higher value land uses to redevelop existing employment sites. This is reflected in the loss of business (B Use) and retail (A1 Use) floorspace to residential in recent years;
- There are a high percentage of homeworkers, most of whom are self-employed;
- The majority of businesses in the district employ less than 10 people and this has been consistent since 2015;
- The largest employment sectors in the district are public administration, education and health and there is a lack of diversity in some economic sectors;
- Within the district, more businesses appear to be closing as opposed to starting up;
- Some of the district's industrial estates are ageing and may not be realising their full potential in terms of occupancy. The review of industrial estates should give a clearer picture on this;
- It is clear that the development of flexible and cultural/creative workspace in the District is a key objective of the Council with a focus on accommodating some of this within the Hailsham Aspires project for the regeneration of Hailsham town centre; and
- The South East Local Enterprise Partnership is pursuing many strategies to support and grow the South East Economy.

### **Likely evolution without the Local Plan**

3.17.45 The likely evolution without the Local Plan is:

- Business start-ups continue to fall;
- Loss of employment floorspace, in particular office floorspace, will continue due to pressure for housing development; and
- Survival rates of new businesses continue to decrease due to lack of appropriate floorspace/units being planned for.

### **Possible Local Plan/Policy Approach to sustainability issues**

3.17.46 The possible Local Plan/Policy approaches to the sustainability issues are:

- The Local Plan should ensure that existing employment floorspace is protected from other forms of development (i.e. residential) where possible;
- The Local Plan should consider opportunities to meet the needs of existing employment sites/businesses seeking to expand. This should take account of potential sustainable rural locations, where there is a demand, as well as more urban settings;
- Policies to support smaller businesses should be investigated as the majority of businesses in the district are 'micro' businesses and employ less than 10 people;
- However, the Local Plan needs to ensure that it can identify and provide suitable employment land for the identified economic growth needs of the



district – this will need to be informed by a robust evidence base in relation to economic needs;

- The Local Plan should seek to encourage the retention and provision of a range of small business units to meet the needs of local business;
- To address the issue of declining business start-ups, the Local Plan should consider the different types of employment needed through any business allocations work or policies i.e. the review of industrial estates; and
- The Local Plan should ensure that it takes account of the aims, objectives and any strategies within the SELEP work being undertaken as well as any other relevant local and regional studies.

### **Sustainability Appraisal Objectives**

3.17.47 In order to address these sustainability issues, there should be sustainability appraisal objectives dealing with:

- Delivering high quality employment opportunities;
- Increasing the vitality and viability of town and village centres; and
- Promoting sustainable economic growth and employment opportunities.

## 3.18 Tourism

### **Relevant Plans, Policies and Programmes (PPPs)**

3.18.1 Tourism is intrinsically linked to the economy, employment, health and wellbeing, leisure and recreation, therefore the PPPs at the international and European level are the same as those discussed previously.

#### National

3.18.2 The UK government has always recognised the importance of tourism to the economy and has introduced new policies and laws over the years. The Development of Tourism Act (1969) provides for the establishment of a British Tourist Authority and Tourist Boards for England, Scotland and Wales with responsibility for promoting the development of tourism to and within Great Britain. It also provides for the giving of financial assistance out of public funds for the provision of new hotels and other establishments at which sleeping accommodation is provided by the way of trade or business. The British Tourist Authority and the English Tourism Council have now been merged to form Visit Britain. The Development of Tourism's acts aim was to co-ordinate all the organisations that make up the tourism sector.

3.18.3 In April 2013, the then Secretary of State for Culture, Media and Sport launched Visit Britain's long term tourism growth strategy for Britain. This ambitious strategy - Delivering a Golden Legacy: a growth strategy for inbound tourism 2012-2020<sup>176</sup> - sets out what Britain can do to ensure that international tourism delivers the largest economic benefit possible and how marketing and policy objectives can be aligned. It aims to attract 40 million international visitors a year, spending £31.5 billion, by 2020.

3.18.4 Visit Britain also conducted a major piece of work, producing assessments of Britain's competitive position in each of our 21 priority markets – identifying opportunities for and barriers to growth. This work identified four key elements which together are drivers of future success:

- Build on Britain's image;
- Increase distribution through the travel trade;
- Broaden the product offering and make it easier to visit Britain by improving Britain's visa process; and
- Increasing aviation capacity to promote new air routes, particularly from emerging markets.

3.18.5 Visit Britain's aim is to work in partnership with the travel industry, government departments and agencies so that organisations across the public and private sectors can align to deliver tourism's full economic growth potential over the remainder of this decade. The private sector has a key role to play and in 2018/19 Visit Britain secured £11.5m in cash and marketing in-kind support, through their partnership activity.

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<sup>176</sup> <https://www.visitbritain.org/britain-tourism-strategy>

3.18.6 Tourism South East (TSE) is a partnership organisation providing services and expertise to support the performance and growth of tourism businesses and destinations, including domestic and international marketing, visitor information services, and customer care training courses. They conduct research into accommodation occupancy, visits to attractions and tourism volume and expenditure in the south east amongst other things, in order to support businesses and the tourism sector.

3.18.7 The National Planning Policy Framework (2019) continues the link of tourism to the economy of the UK. It requires local plans and their policies to enable sustainable rural tourism and leisure developments, provided they respect the character of the countryside and also acknowledges that tourism can be a key town centre use in the form of theatres, museums, galleries and concert halls, hotels and conference facilities.

### Local

3.18.8 At the local level, WDC's current objectives for tourism are to maximise its benefits to Wealden, while minimising its negative impacts. The focus will be to increase the value of tourism rather than the volume of visitors by appealing to high spending, staying visitors, to support town centres and village high streets and drive employment. The Council is reviewing the potential to look at tourism as part of a joint paper on economic development in the district. A Wealden Tourism Steering Group was set up to support tourism related activity across the district as identified in the priorities set out in the 2016 tourism way forward report.

3.18.9 Viticulture is also a new and expanding tourism area in the district. A feasibility study undertaken in 2017 reported that Wealden District has over 148 hectares (355 acres) under vine and the Wine Standards Board 2016 report lists 26 vineyards, 24 vineyard owners and 5 wineries in Wealden, although it is noted that the sector is dominated by two wine estates – Rathfinney and Bluebell – who between them own two thirds of the planted area. The sector appears to be performing well with more than 90% of vineyards expecting growth over the next 3-5 years. There are concerns however relating to barriers to growth mainly in respect of sourcing labour, the impact of Brexit and strict planning considerations.

3.18.10 To support the sector Wealden District Council set a Wine Cluster group and now work with 16 of the vineyards. A new marketing campaign is underway in partnership with Locate East Sussex and aims to bring local businesses together in the consortium to:

- help strengthen and promote the overall wine tourism offer in the county;
- help to create a step change for vineyards and wineries in the Wealden area; and
- to raise the profile of the county as an attractive proposition to potential investors, especially those in the wine tourism trade and supply chain.

3.18.11 The Sussex Heritage Coast partnership was set up in 2014 and aims to conserve and enhance the area, promoting understanding and enjoyment, having

regard to the socio-economic well-being of local communities. A plan was created to provide a framework for the Sussex Heritage Coast based on partnership working and to identify an action plan for 5 years which ends in 2020. A new plan is now being produced which will have a duration of 10 years with more emphasis on Health & Wellbeing and Heritage Management.

3.18.12 The Sussex Modern consortium was initiated to promote galleries and museums across East Sussex, today it has expanded to also promote landscapes and viticulture and includes thirty-six memorable places that defines the county's modern, independent spirit. Included from the Wealden area is 1 gallery/museum, 6 areas of landscape and 2 vineyards.

3.18.13 The Coastal Culture Trail is also part of Sussex Modern which links 3 award winning galleries in East Sussex with 18 miles of coastline. The trail encourages visitors to enjoy their stay in the area by supporting local businesses, sampling local food, taking sustainable transport and enjoying contemporary art.

3.18.14 The 1066 Country partnership is an internationally recognised brand, which spans a 378 square mile area of historic coast and countryside that includes Battle, Bexhill, Hastings and Pevensey Rye and surrounding area. The partnership has been in existence for 25 years, and its constitution is made up of both public and private sector partnership; Hastings Borough Council, Rother District Council, Wealden District Council, Tourism South East, National Trust and English Heritage and the private sector. Within the Wealden district, The 1066 Country covers the towns of Pevensey, Herstmonceux and part of the Cuckoo Trail.

3.18.15 The 1066 Country Pathways Project is a long distance pathway project covering East Sussex, and spans 31-miles from Pevensey, passing through Battle, and ending at Rye. Themed signage and sculpture trail infrastructure along the route aims to combine with a new project, a Puddings and Pathways Festival, linking further with quality rural eateries and accommodation on route.

3.18.16 Wealden will be undertaking a Visitor Accommodation Futures Study which will provide an up-to-date, objective, evidence-based assessment of the opportunities and requirements for the future development of all forms of hotel and visitor accommodation across Wealden District. The findings are to be used to provide a demand side analysis to inform planning policy development and development management decision-making, and to support future inward investment and business support activities.

### **Baseline and Trends**

3.18.17 Wealden District covers 323 square miles of rural East Sussex, including the iconic Seven Sisters coastline. Its' core appeal to visitors is its beautiful, varied and unspoilt landscapes and views. It has undeveloped coastal cliffs, beaches and countryside that varies from ancient woodland, forests and heathland to a patchwork of medieval fields, parklands and open rolling downs.

3.18.18 Tourism within Wealden is a key part of the economy, as well as offering health and wellbeing benefits, including recreational and leisure pursuits, to residents and visitors. In terms of income generation, in 2018 tourism generated:

- £310.2 million from tourists during their visit to the area;
- £25.85 million spending on average in the local economy every month;
- £110 million from overnight visits;
- £200.2 million from day trips; and
- £368.7 million spent in the local area as a result of tourism.

3.18.19 The sector also supported 9,007 jobs, both for local residents and from those living nearby, with 7,729 tourism jobs directly supported. There were 1,278 non-tourism related jobs supported and around 18.8% of the districts population are employed as a result of tourism in Wealden.

### **Key Sustainability Issues**

3.18.20 The key issues arising from the review of PPPs and baseline information relating to the economy and employment are:

- New tourism businesses are looking to develop and locate within the district, and the Council are keen to encourage this. However, some could have negative impacts i.e. viticulture and the impact on the landscape, which will need to be carefully considered;
- There could be issues in balancing new tourism developments with other priorities/issues in the district i.e. infrastructure; and
- There may be issues in seeking to increase the value of tourism rather than the volume of visitors by appealing to high spending, staying visitors, to support town centres and village high streets and drive employment.

### **Likely evolution without the Local Plan**

3.18.21 The Likely evolution without the Local Plan is:

- Less growth in the sector due to lack of support or development of any required supporting infrastructure; and
- Reduction in the financial and economic benefit of the tourism sector to the district.

### **Possible Local Plan/Policy Approach to sustainability issues**

3.18.22 The possible Local Plan/Policy approaches to the sustainability issues are:

- The Local Plan should seek to ensure that tourism is afforded appropriate weight in terms of the approach taken to the economic, as well as leisure, strategy and policies;
- The Local Plan should support the development of a diversified tourism sector through its policies whilst balancing other policy requirements; and

- Any policies should seek to support and where possible deliver the aims and objectives of any forthcoming Tourism Strategy.

### **Sustainability Appraisal Objectives**

3.18.21 In order to address these sustainability issues, there should be sustainability appraisal objectives dealing with:

- Increasing the vitality and viability of town and village centres;
- Protecting and enhancing the countryside, landscape and green spaces; and
- Promoting sustainable economic growth and employment opportunities.

## 3.19 Town Centres

### Relevant Plans, Policies and Programmes (PPPs)

3.19.1 Town centres are very much specific to their location and context within a country, area and town. Therefore at the international and European level, PPPs connected with industry and the economy overall are relevant as they inevitably contain measures related to economic growth and development, of which town centres are a part. However, some of the PPPs that have a bearing on Town Centres are listed below.

#### International

3.19.2 The UN Resolution 2015 Transforming our world: the 2030 Agenda for Sustainable Development (2015) has as part of Goal 8 the promotion of sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all. Goal 11 is also relevant as it seeks to make cities inclusive, safe, resilient and sustainable.

#### European

3.19.3 At the European level the following PPPs may have a bearing indirectly on town centres:

- **European Air Quality Framework Directive (1996) and Air Quality Directive (2008)** - these put in place measures for the avoidance, prevention, and reduction in harmful effects to human health and the environment associated with ambient air pollution and establish legally binding limits for the most common and harmful sources of air pollution. The 2008 Directive sets legally binding limits for concentrations in outdoor air of major air pollutants that impact public health such as particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) and nitrogen dioxide (NO<sub>2</sub>); and
- **European Floods Directive (2007)** – Provides a framework for the assessment and management of flood risk.

3.19.4 The Air Quality Directives will help to make air cleaner within town centres by reducing air pollutants which will make them healthier places for people. The Flood Risk Directive will ensure any potential risks to existing and new town centre developments are taken into account.

#### National

3.19.5 In terms of national level PPPs, the issue of town centres is combined with those on economic growth in general.

3.19.6 The Industrial Strategy (2017)<sup>177</sup> for example seeks to boost productivity by backing businesses to create good jobs and increase the earning power of people

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<sup>177</sup> <https://www.gov.uk/government/publications/industrial-strategy-building-a-britain-fit-for-the-future>



throughout the UK with investment in skills, industries and infrastructure. It promotes five foundations to achieve this:

- Be a more innovative economy;
- Create good jobs and greater earning power for all;
- Upgrade infrastructure;
- Make better for business to start and grow, and
- Create more prosperous communities.

3.19.7 Within the NPPF, Chapter 7 contains the policies that will seek to ensure the vitality of town centres but Chapter 6 is also relevant as it deals with policies to address building a strong and competitive economy. However, many parts of the NPPF will have an impact in some way on town centres be it in the promotion of sustainable transport making access easier and cleaner; promoting safe and healthy communities so people feel reassured accessing town centres or achieving well designed places so that town centres are attractive places to visit.

3.19.8 Specific to town centres though, the NPPF states that planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. To enable this, policies must define a network and hierarchy of town centres and promote their long term growth, including allowing them to grow and diversify to meet changes in the retail and leisure sectors (para 85a).

3.19.9 Plans should also define the extent of town centres and shopping areas and make clear the range of uses that are permitted in those areas; retain and enhance existing markets and reintroduce them where appropriate; allocate a suitable range of sites within town centres to meet the scale and type of development that is likely needed and also recognise that residential development can play an important role in ensuring town centres vitality (para 85b – f).

3.19.10 The NPPF also take forward the “sequential test” for the main town centre uses that are not within an existing centre and not in accordance with an up-to-date plan. Paragraph 86 notes that “main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.”

3.19.11 With regards to the economy, the policies within the NPPF can help as they require that planning policies and decisions help create the conditions in which businesses can invest, expand and adapt and this applies to town centres as much as it does to other parts of the economy. It also advocates that planning policies should enable the sustainable growth and expansion of all types of business in rural areas, which will help support the local centres in the larger villages of the district.

### Local

3.19.12 The South East Local Enterprise Partnership (SELEP): Strategic Economic Plan (2014) acknowledged that in order to deliver the potential development and sites within the A22/A27 Eastbourne-South Wealden Area,

improvements to Uckfield and Hailsham town centres (amongst others) were required, together with measures including a sustainable transport corridor from Eastbourne to Hailsham via Polegate<sup>178</sup>. The SELEP have already supported growth in this corridor through Uckfield and Hailsham town centre improvements. The East Sussex Growth Deal Area within the SELEP Strategic Economic Plan (2014) includes the Uckfield Town Centre Accessibility Improvement Package.

3.19.13 The SELEP agreed its new Strategic Economic Plan 2019, outlining its priorities and aims to drive a more productive and prosperous economy for the area over the next decade in December 2018. The document sets out how SELEP will help meet this challenge. It sets SELEP's ambitions for the south east economy and how we will achieve them: tackling housing shortages; relieving pressure on infrastructure and improving skills across the workforce. It includes a 5 year action plan intended to deliver on the Government's National Industrial Strategy and on a pathway towards a robust Local Industrial Strategy for the South East.

3.19.14 Under the Strategic Economic Plan's priority for putting the South East's towns, cities and rural communities on the 'front foot' in responding to new technology and changing work patterns, it acknowledges that many town centres have suffered from technology-driven changes to retail patterns – so there is an opportunity to repurpose the High Street to provide new opportunities for modern business growth.

3.19.15 The Council's latest analysis of our town centres is set out in the Town Centre and Retail Study (2016)<sup>179</sup>. The study assessed the relative health, role and function of the District's main centres and forecast the need for new retail floorspace over the Plan period. The Council is currently seeking to update this evidence base with a review of the Report's findings in light of the challenges faced by the retail and leisure sectors in light of the impact of the coronavirus pandemic and the resulting changes in people shopping habits. This will form a key evidence base for our new Local Plan.

3.19.16 The East Sussex County Council Local Transport Plan (2011 to 2026) seeks to improve accessibility for pedestrians, cyclists and public transport users as well as traffic movement into and within Eastbourne and Hailsham town centres.

### Neighbourhood

3.19.17 The [Hailsham Neighbourhood Plan](#) has successfully passed examination stage and will go to a referendum of local electors once restrictions relating to COVID-19 are lifted. Chapter 12 sets out range of policies for Hailsham Town Centre that seek to add to the vitality and viability of the centre by strengthening the retail offer and visitor experience, The Council gives significant weight to the plan in decision making

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<sup>178</sup> Para 2.125 of the Plan [https://www.southeastlep.com/app/uploads/Strategic\\_Economic\\_Plan\\_2014.pdf](https://www.southeastlep.com/app/uploads/Strategic_Economic_Plan_2014.pdf)

<sup>179</sup> Carter Jonas, [Town Centre and Retail Study \(2016\)](#)

## **Baseline and Trends**

3.19.18 Despite being a rural district it is possible to reach town centres within 30 minutes from anywhere in the district by car. It is however not possible to reach the town centres by walking, cycling or public transport within 30 minutes from some of the most rural areas of the district.

<b>Journey time</b>	<b>Public transport/walking</b>	<b>Cycle</b>	<b>Car</b>
15 mins	28.9	45.2	72.2
30 mins	79.2	79.8	100
45 mins	94.3	97.5	100
60 mins	96.1	100	100

Table 23: Access to town centres in journey time and by mode of transport 2016<sup>180</sup> - % of population

3.19.19 The health of the District's town centres can be viewed, amongst other things, in the amount of retail floorspace that has been completed but also the amount that has been lost to residential development. Table 24 details the amount of A1 and A2 floorspace that has been lost to residential development since 2014/15.

	2014/15	2015/16	2016/17	2017/18	2018/19	<b>Total lost</b>
A1 Shops	-219	-244	-154	-198	-317	<b>-1,132</b>
A2 Financial & Professional Services	-249	-296	-189	-42	-255	<b>-1,031</b>
<b>Total lost (sqm)</b>	<b>-468</b>	<b>-540</b>	<b>-343</b>	<b>-240</b>	<b>-572</b>	<b>-2,163</b>

Table 24: Town Centre uses floorspace lost to residential – Wealden<sup>181</sup>

3.19.20 Despite the losses detailed above, overall there has been a net total of 2,080 sqm of A1 floorspace completed in the district between 2014/15 and 2018/19. There has however, been an overall net loss of 1,675sqm of A2 floorspace during the same period<sup>182</sup>. It will be important to monitor the losses of A1 especially to residential and other forms of development moving forward as the districts town centres need to be able to cater for the needs of the local and wider district population.

## **Key Sustainability Issues**

3.19.21 The key issues arising from the review of PPPs and baseline information relating to town centres are:

- The districts town and local centres need to be supported in terms of their vitality, viability and uniqueness;
- There has been a consistent loss of retail floorspace to residential development since 2014/15;

<sup>180</sup> Department for Transport, Journey time statistics: Access to services (Released May 2018). Access to town centres, 2014-16 - super output areas. Available at: [www.eastsussexinfigures.org.uk](http://www.eastsussexinfigures.org.uk)

<sup>181</sup> WDC Monitoring

<sup>182</sup> WDC Monitoring

- The change in shopping habits associated with the rise in internet shopping will impact how our town centres function in the future
- There is a keen focus on improving town centres in the SELEP Strategic Economic Plan;
- The use of more sustainable transport modes (public transport, walking and cycling) to access town centres is difficult as only 80% of the population are within 30 minutes of a town centre by those modes and only 28% are within 15 minutes by walking and 45% by cycling. It is still easier to take the car; and
- More cars on the road as a result of development may lead to increased congestion causing an increase travel time to town centres – therefore improving walking and cycling provision is important.

### **Likely evolution without the Local Plan**

3.19.22 The likely evolution without the Local Plan is:

- Continued loss of retail floorspace which negatively impacts the districts town and village centres; and
- Development comes forward in areas not easily accessible to services and facilities in town centres.

### **Possible Local Plan/Policy Approach to sustainability issues**

3.19.23 The possible Local Plan/Policy approaches to the sustainability issues are:

- Ensure that through the Local Plan and its policies, main town and local centre uses are protected and that any new town centre uses are located in the town centre rather than out of town;
- The Local Plan policies could set a vision for each of the larger town centres in the District that seek to address the sustainability issues raised;
- The impact of redevelopment of existing retail units into residential should be considered, especially where this could create dead frontages in shopping parades;
- Seek to locate major trip generating activities in/close to town centres and areas of high public transport accessibility (in order to increase opportunities for sustainable modes of travel);
- The Local Plan could promote more of an evening economy in our town centres, where appropriate;
- Housing allocations should be situated in locations where access to local shopping facilities, village and town centres exist or where new facilities can be provided. Existing facilities could also be improved or maintained to improve provision. This will reduce the reliance on car use and will assist to promote sustainable transport modes (public transport, walking, cycling);
- The Local Plan and policies should look at the protection of local shopping facilities, village and town centres.

### **Sustainability Appraisal Objectives**

3.19.24 In order to address these sustainability issues, there should be sustainability appraisal objectives dealing with:

- Increasing the vitality and viability of town and village centres; and
- Promoting sustainable economic growth and employment opportunities.

## 3.20 Transport and Communications

### **Relevant Plans, Policies and Programmes (PPPs)**

3.20.1 At the international and European level, there are no identified PPPs relevant to this sub-topic.

3.20.2 However, the UN Resolution 2015 Transforming our world: the 2030 Agenda for Sustainable Development (2015) has as part of Goal 11 'Sustainable cities and communities' the aim that by 2030 the provision of safe, affordable, accessible and sustainable transport will be there for all to use.

#### National

3.20.3 The 'Future of mobility: urban strategy' (2019)<sup>183</sup> outlines the government's approach to maximising the benefits from transport innovation in cities and towns. It sets out the principles that will guide the government's response to emerging transport technologies and business models.

3.20.4 The Inclusive Transport Strategy (2018)<sup>184</sup> is the government's plans to make the transport system more inclusive and better for disabled people.

3.20.5 The Transport Investment Strategy (2017)<sup>185</sup> sets out the Department for Transport's priorities and approach for future transport investment decisions.

3.20.6 The NPPF (2019) sets out that transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- The potential impacts of development on transport networks can be addressed;
- Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised;
- Opportunities to promote walking, cycling and public transport use are identified and pursued; and
- The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account.

3.20.7 It also makes it clear that patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.

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<sup>183</sup> <https://www.gov.uk/government/publications/future-of-mobility-urban-strategy>

<sup>184</sup> <https://www.gov.uk/government/publications/inclusive-transport-strategy>

<sup>185</sup> <https://www.gov.uk/government/publications/transport-investment-strategy>

## Local

3.20.8 A draft of the Transport Strategy for the South East (2019) presents a shift away from traditional approaches of transport planning – one based on planning for a future based on recent trends and forecasts – to an approach of actively choosing a preferred future and setting out a plan of how to get there. Transport for the South East’s vision for the area is: By 2050, the South East of England will be a leading global region for net-zero carbon, sustainable economic growth where integrated transport, digital and energy networks have delivered a step-change in connectivity and environmental quality. A high-quality, reliable, safe and accessible transport network will offer seamless door-to-door journeys enabling our businesses to compete and trade more effectively in the global marketplace and giving our residents and visitors the highest quality of life.

3.20.9 The draft Transport Strategy for the South East did provide a number of key challenges to improve upon that that included the M23/A23/Brighton Mainline Corridor, the M27/A27/A259/East Coast Way/West Coast Way Corridor, the A22 and the Lewes to Uckfield line (former railway connection) that are all, in part, impacting residents and employees within the district.

3.20.10 The East Sussex County Council Local Transport Plan (2011 to 2026)<sup>186</sup> sets out the County’s direction for planning and providing the transport infrastructure and services that are needed to deliver sustainable economic growth and support additional housing in the county during this period. The Strategy seeks to plan and provide transport infrastructure which delivers sustainable economic growth in areas which have been identified as needing greater investment for regeneration and development and this includes the Eastbourne/ South Wealden area as well as looking at improvements in the more rural areas in north Wealden, being sensitive to the nature of the issues in this area and the appropriateness of different measures.

3.20.11 This Transport Plan sets out that in order to maintain economic activity and quality of life across the county as a whole, it will give priority to:

- Effective Highway Maintenance and Management of our Transport Assets;
- Improved Road Safety; and
- Supporting the delivery of Public and Community Transport.

3.20.12 It will also continue to lobby for strategic road and rail infrastructure improvements and encourage non-transport measures which reduce the need to travel in the county.

3.20.13 For the Eastbourne and South Wealden area, the Transport Plan identifies the following in order to address the likely travel demand from new development and to promote economic revival:

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<sup>186</sup> <https://www.eastsussex.gov.uk/roadsandtransport/localtransportplan/ltp3/downloadltp3>



- investigate and implement, where there is a demonstrable positive impact and its represent good value for money, long term improvements across the transport network to facilitate housing and employment growth including:
  - traffic signals at Cophall roundabout;
  - improvements at junctions between the A22 Jubilee Way, the A27 and Dittons Road;
  - Improvements to Hempstead Lane junction to alleviate traffic congestion on the A271 and Hailsham town centre;
  - relieve town centre congestion on the Battle Road, London Road and High Street corridors in Hailsham;
  - a Parkway station west of Polegate; and
  - road / junction improvements between Cophall Roundabout and the A27(identified in SWETS as desirable).
- make improvements to key junctions on the main transport corridors in the area to make best use of the existing network as well as to accommodate the needs of pedestrians, cyclists and public transport;
  - A2270 Polegate to Eastbourne;
  - A2280 Cross Levels Way;
  - A259 Seaford – Eastbourne – Pevensey;
  - A22 Polegate to Hailsham (Boship);
  - A22 Lottbridge Drove;
  - A295 Hailsham;
  - A271 north of Hailsham; and
  - Ersham Road/Friday Street/Lion Hill/ Langney Rise.
- improve accessibility for pedestrians, cyclists and public transport users as well as traffic movement into and within Eastbourne and Hailsham town centres;
- focus on improvements to and safety of key walking routes and corridors of movement;
- develop a cycle strategy, and implement a network of routes which focus on:
  - the improvement of the National Cycle Network routes, and
  - providing links to residential areas in Eastbourne and neighbouring settlements in the South Wealden area.
- continue the promotion of travel plans in businesses and schools, through the Travel choice brand, to encourage changes in travel behaviour towards sustainable modes of travel work; and
- Work with the National Park Authority, to improve walking, cycling and public transport links into the SDNP.

3.20.14 The Transport Plan also focuses on improvements to the transport network in and around Uckfield to ensure that housing and sustainable economic growth can be brought forward. This includes focusing on improvements to and safety of key walking and cycling routes; continuing support and lobbying for electrification, dual tracking, and in the short term, increased capacity on the Uckfield line; focusing on measures which improve access to bus stops on key routes in the town and continuing to lobby for the reinstatement of the Uckfield to Lewes railway line, and the Eridge to Tunbridge Wells railway line.

3.20.15 In the north of Wealden, the Transport Strategy also focuses on retaining and enhancing both Heathfield and Crowborough as service centres

through the provision of local sustainable travel options in order to reduce the need to travel to other settlements. Again, the focus is on improving walking and cycling routes; public transport on key routes and public transport links between settlements.

3.20.16 The Environment Strategy for East Sussex (2020) seeks to protect and enhance the natural and built environment for current and future generations and tackle and adapt to climate change. Five priority environmental themes have been identified aligning with international and national policy. These are: climate change, natural capital, air quality, and water and resource efficiency. A number of the actions identified relate to transport matters, including the action to:

- develop a Local Cycling and Walking Infrastructure Plan; and
- develop and implement an electric vehicle strategy for East Sussex.

3.20.17 ESCC has worked with local stakeholders, including district and borough councils, the South Downs National Park and local cycling, walking and access groups in the development of an East Sussex Local Cycling & Walking Infrastructure Plan. This document will be subject to a public consultation later in the year.

3.20.18 ESCC are starting work on Local Transport Plan 4 which will build on the key messages and direction coming out of TfSE Transport Strategy and the LCWIP. It will be essential that the Local Plan and the Local Transport Plan are developed together to ensure a consistent and integrated approach to common objectives around climate change, air quality, health, accessibility, connectivity and place shaping.

3.20.19 The Local Plan will need not only to promote and encourage but it will need to enable more sustainable transport patterns including walking, cycling and public transport. It will need to reduce the need to travel, particularly by car through the location and design of new development and places which also provide more opportunities for active travel and for the provision and link to public transport. Increased active travel and public transport will support the Government's focus on decarbonising transport as well as contributing towards our respective authority's target of achieving net zero carbon emissions by 2050.

### **Baseline and Trends**

3.20.20 The district is very rural in nature. The main roads in the district are the A22, A26, A27 and A267 and these connect the towns within the district as well as connecting to main towns/cities outside of the district i.e. Eastbourne, Royal Tunbridge Wells, Hastings, Bexhill, Lewes, East Grinstead and Brighton and Hove.

3.20.21 In terms of rail provision, the main routes travel east/west in the south of the district and there are linkages northwards to London from the north of the district. There is no north/south rail network within the district itself and so journeys north and south (and vice versa) are usually by road.

3.20.22 Wealden Council has a role to play in influencing the behaviour of its residents, encouraging 'modal shift' away from the highest emitting forms of

transport towards the lower emitting forms of transport where possible. This includes the development of public transport networks and making areas suitable for cyclists.

### Car ownership

3.20.23 The number of households within the district owning one or more cars has increased from 50,042 in 2001 to 54,875 in 2011, according to the Census. This increase of 4,833 is likely to have continued increasing with the population rise in the district, number of households and members of the households wanting their own car.

3.20.24 It is interesting to note that of all household types without a car, there has been a significant decrease in the proportion of pensioner households and lone parent households without a car. Having access to a private car for these households could provide them with more independence and reduce isolation, particularly in more rural areas of the district.

### Commute to work

3.20.25 According to the Census 2011, the net commuting flow within Wealden is -15,463 meaning more people commute out of the district for work. However, the district does have 33,154 working age people who live and work within the district<sup>187</sup>. This trend in net commuting has remained largely the same since 2001.

3.20.26 In terms of the mode of transport, the majority of in-commuters to the district (82.2%) drive a car or van and only 6.2% use public transport. A similar pattern is shown with out-commuters, where 74.9% drive a car or van and only 17.3% use public transport. This illustrates the deficiencies of the public transport system within the district, especially for work purposes.

<b>Mode of transport</b>	<b>Total in-commuters (%)</b>	<b>Total out-commuters (%)</b>
Public transport	6.2	17.3
Car or van	82.2	74.9
On foot	3.2	1.6
Cycling	1	0.8
Passenger in a car or van	5.7	4.1
Motorcycle	1	0.8
Taxi	0.2	0.1
Other	0.4	0.4

**Table 25: Commuting flows by method of travel to work in 2011**

3.20.27 Out of the total number of working age people within the district, just over 33% commute less than 10km to reach their place of work<sup>188</sup> but only a small

<sup>187</sup> Office for National Statistics, 2001 and 2011 Censuses, from Nomis. Commuting flows in 2001 and 2011 – districts. Available at: [www.eastsussexinfigures.org.uk](http://www.eastsussexinfigures.org.uk)

<sup>188</sup> East Sussex in Figures, Distance travelled to work by age and sex in 2011 - super output areas. Available at: [www.eastsussexinfigures.org.uk](http://www.eastsussexinfigures.org.uk)

percentage travel on foot or cycle (see Table 25). This could suggest that if cycling and walking infrastructure were improved some of these workers may opt for a more sustainable mode of transport to reach their place of work.

### Traffic Congestion

3.20.28 Data on traffic congestion for the county shows that average speeds on A Roads in East Sussex have reduced from around 29mph in 2015 to 28.8mph in 2018<sup>189</sup>. This indicates that congestion has gotten worse and emphasises the need for more sustainable travel modes.

### Walking and cycling

3.20.29 As already mentioned in section 3.14, walking and cycling are being undertaken in the district for all purposes (leisure and work), although cycling uptake is significantly lower than walking. This may indicate a lack of cycling infrastructure or the safety of the district's roads for cyclists.

### Road safety

3.20.30 There was a total of 565 casualties on the public highways in the district during 2018, this is a drop of just over 20% since 2008 when there was a total of 709 casualties. The number of fatalities has dropped from 17 in 2008 to 10 in 2018, with motorised user fatalities decreasing, showing that roads and vehicles are getting safer. Unfortunately, the number of fatalities from non-motorised users has stayed constant, although the total casualties of non-motorised users has been on the decline since 2008.

### Communications

3.20.31 With around 44% of the businesses in Wealden functioning from rural areas and, as of 2018, 22% of the population working from home, then the ability to connect to superfast broadband is an important part of the rural economy, especially where there are significant issues concerning transport links. This is important to both businesses that use traditional business estates and premises, and those businesses that are set up at home or are located in the countryside as part of a rural diversification scheme.

3.20.32 The Council are unable to ascertain broadband speeds across the district owing to the commercial nature of broadband provision. However, anecdotally studies have shown that speed is an issue for some of our residents and businesses. Therefore, the provision of suitable broadband is a priority for the Council and the Local Enterprise Partnership.

3.20.33 In addition to broadband speed, mobile phone coverage is also inadequate in some places, with no coverage or partial coverage. This is currently not meeting the needs of the districts residents and businesses. There is a need for

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<sup>189</sup> East Sussex in Figures, Average Speeds on A roads. 2015-2018, county. Available at: [www.eastsussexinfigures.org.uk](http://www.eastsussexinfigures.org.uk)

reliable 2G, better coverage of 3G and if possible a 4G or indeed 5G network to assist the district's economy.

3.20.34 Specific consideration should be given by developments within housing and employment allocations to the opportunities of incorporating superfast broadband infrastructure, particularly where superfast broadband is not available to the existing households within the settlement.

### **Key Sustainability Issues**

3.20.35 The key issues arising from the review of PPPs and baseline information relating to transport and communications are:

- There is a high dependency on the private car for travel in the district and so improving choices for more sustainable travel, including walking and cycling provision and accessible public transport is needed;
- The district suffers with poor public transport primarily due to its rural nature;
- The district experiences high car use with transport infrastructure at capacity during peak times and congestion on the road network;
- More people commute out of the district for work and do so by car or van rather than public transport. Those who work within the district also have a high reliance on the car / van; and
- The district suffers from poor mobile and broadband connectivity in some areas mainly due to the rural nature of the district.

### **Likely evolution without the Local Plan**

3.20.36 The likely evolution without the Local Plan is:

- Car ownership and use continues to increase, negatively affecting air quality, causing congestion, increasing the likelihood of accidents etc.;
- Public transport provision fails to improve;
- Business growth is stifled due to a lack of effective communications network;
- Lack of infrastructure provision to facilitate walking and cycling; and
- Advances in technology (such as driverless cars, smart management systems, electric cars) will continue

### **Possible Local Plan/Policy Approach to sustainability issues**

3.20.37 The possible Local Plan/Policy approaches to the sustainability issues are:

- Seek improvements to public transport networks in collaboration with partner organisations;
- Promote walking, cycling and public transport as alternatives to car travel for short journeys by improving pedestrian and cycle networks as part of development proposals and in their own right;
- Seek to reduce congestion through encouraging 'Active Travel' choices and car clubs through development proposals;

- Locate major trip generating activities in/close to existing services and facilities and areas of high public transport accessibility (in order to increase opportunities for alternative means of travel);
- Consider whether the Local Plan should require development proposals to provide travel assessments and travel plans, particularly for school and workplaces;
- Reducing the impact of new developments through new traffic management funded by developer contributions; layouts will seek to increase pedestrian and cycle permeability;
- Use of policies to design in safe and accessible walking and cycling networks to developments. This will help support and encourage the proportion of residents who walk and cycle in the district; and
- Any allocations should be situated where access to local shopping facilities, village and town centres already exist or where new facilities can be provided. Existing facilities could also be improved or maintained to improve provision. This will ensure that sustainable access (public transport, walking, cycling) can be achieved.

### **Sustainability Appraisal Objectives**

3.20.37 In order to address these sustainability issues, there should be sustainability appraisal objectives dealing with:

- Reducing the reliance on private cars;
- Improving existing and creating new cycle/walking infrastructure; and
- Promoting sustainable economic growth and high quality communications networks.

## 4 Cross Boundary Implications

4.1 A number of the issues identified above have potential cross-boundary implications for plan-making that Wealden District Council will need to address through the Local Plan and Duty to Co-operate process. These include:

- Air quality and associated air quality impacts from an increase in traffic as a result of increased development. This could have potential impacts on human health as well as habitats (notably the Ashdown Forest SAC and Pevensy Levels SAC);
- Disturbance to habitats as a result of increased recreational pressure and access as a result of development (notably the Ashdown Forest SPA);
- SAC/SPA mitigation and management including any cumulative impacts of development in Wealden and plans within neighbouring LPAs;
- Approach to incorporating the opportunities, aims and objectives of the Natural Capital Investment Plan published by the Sussex Local Nature Partnership;
- Considering implications on the High Weald AONB, including any cumulative impacts of development in Wealden and plans within neighbouring LPAs;
- Considering travel patterns across the wider sub-region and requirements for network improvements and transport interventions in the context of potential growth in housing and commercial development. This will also include impacts beyond the district through to Kent, such as Tunbridge Wells;
- Working closely on a consistent approach to considering infrastructure delivery to support the growth anticipated in the district and the wider sub-area, including social and community infrastructure as well as transport and communications;
- Working closely with East Sussex County Council; Eastbourne Borough Council; Rother District Council and other relevant working groups on the impacts of development on the Pevensy Levels;
- Working closely with Lewes District Council; Tunbridge Wells Borough Council; Mid Sussex District Council; Sevenoaks District Council; Tandridge District Council and other relevant working groups on the impacts of development on the Ashdown Forest;
- Considering the results from ESCC work on groundwater flood risk modelling in the south of the District and hydrological work on the Pevensy Levels Catchment;
- Working closely with Eastbourne Borough Council in relation to flood risk and undertaking any Strategic Flood Risk Assessments;

- Work with Eastbourne Borough Council in relation to policies or strategies to address a modal shift in transport use;
- Working closely with neighbouring LPAs in regards to the demand and supply of housing within the wider Housing Market Area (HMA) and the district's potential to meet unmet housing needs; and
- Working closely with neighbouring LPAs in regards to the demand and supply of commercial/industrial floorspace, including the compatibility of local plan approaches for the growth, the retention of business and defining the Functional Economic Market Area (FEMA).



## **5 Formulating Sustainability Appraisal Objectives and Framework**

### **Introduction**

5.1 In order to measure the operation of the Local Plan and help assess the sustainability of its policies, and to monitor its achievement in sustainability terms, sustainability objectives and indicators have been developed. The objectives are, where possible, expressed in terms of targets, the achievement of which should be measurable using the indicators selected.

5.2 The Sustainability Appraisal (SA) objectives are based on, and reflect, the issues which are affecting the district, as identified in the previous chapter.

### **SA Objectives**

5.3 The Corporate Plan objectives are specific to the development of Wealden District and are detailed below:

1. Protect and enhance Wealden's high quality natural environment and heritage;
2. Promote a better quality of life for Wealden people through activities that improve health, resilience and well-being;
3. Improve access to essential services for all our communities;
4. Ensure development meets future needs, with associated investment in infrastructure;
5. Take advantage of opportunities to promote new, cleaner technologies;
6. Work with partners to regenerate our diverse market towns, creating jobs and attracting investment;
7. Support our local businesses and entrepreneurs to achieve a locally sustainable economy; and
8. Generate ongoing sources of income to reinvest in local priorities and optimise funding from external sources.

5.4 Whilst the Corporate Plan objectives set the aims and aspirations of the district, the Local Plan SA objectives are more specific goals for land use in Wealden. The SA objectives provide the framework for assessment. They are designed to provide a balance between the three objectives of sustainable development: the environment, the economy and society. Many of the objectives are cross-cutting and not purely social, environmental and economic objectives.

5.5 The final list of objectives for the SA can be viewed in Table 26 below. Table 27 provides a set of decision making criteria/questions for each of the SA Objectives to assist in the appraisal of policies, options and reasonable alternatives moving forward in the SA process, as well as in the appraisal of the Local Plan as a whole. It should be noted that the criteria/questions are not meant as an exhaustive list.

<b>SA Objectives for the Wealden Local Plan</b>			
	<b>Env</b>	<b>Econ</b>	<b>Soc</b>
1. To tackle the climate emergency by reducing greenhouse gas emissions, protecting existing carbon sinks and increasing their potential to store carbon, promoting zero carbon technologies and renewable energy technologies.	√	√	√
2. To adapt to the effects of a changing climate by protecting and managing water resources.	√	√	√
3. To adapt to and mitigate the risk of flooding from all sources taking account of the impact of climate change.	√	√	√
4. To reduce pollution (air, noise, light, water and soil), improve air and water quality and minimise impacts associated with development.	√		√
5. To protect and enhance existing habitats, species and biodiversity and deliver measurable biodiversity net gain	√		
6. To prevent and reduce the amount of waste, and minimise the use of non-renewable resources.	√		
7. To protect and enhance the quality and range of natural green spaces and to improve the wider green infrastructure network.	√		√
8. To ensure development protects existing open spaces and creates open space in areas of deficiency, in regards to quantity and quality standards.	√		√
9. To conserve and enhance the district's countryside, landscape, historic environment and cultural assets.	√	√	√
10. To ensure development makes efficient use of land, buildings and infrastructure, including previously developed land.	√	√	√
11. To improve the quality of the built environment and promote high quality and sustainable urban design, including preserving and, where possible, enhancing the district's heritage assets and their settings.	√	√	√
12. To provide a range of high quality homes, including affordable housing, to meet local needs.		√	√
13. To promote healthy, safe and inclusive communities, and promote equal opportunities including allowing people to remain independent.			√

<b>SA Objectives for the Wealden Local Plan</b>			
	<b>Env</b>	<b>Econ</b>	<b>Soc</b>
14. To ensure access to local services and facilities, including local shopping, leisure facilities, open space, the countryside and sport and recreation opportunities.		√	√
15. To reduce reliance on private transport modes, enable alternatives to the car, and enhance safer routes and permeability for walkers and cyclists.	√		√
16. To increase the vitality, viability and uniqueness of the district's existing town centres, local centres and village centres.		√	√
17. To promote sustainable economic growth and employment opportunities, including access to high quality jobs.		√	√
18. To improve the level of skills, education and training of the population.		√	√

**Table 26 SA Objectives**

## SA Assessment Framework and Decision Making Guidance

Sustainability Appraisal Objective	Policy/Plan decision making guidance
<p>1. To tackle the climate emergency by reducing greenhouse gas emissions, protecting existing carbon sinks and increasing their potential to store carbon, promoting zero carbon technologies and renewable energy technologies.</p>	<ul style="list-style-type: none"> <li>• Does it include measures to maximise energy efficiency?</li> <li>• Does it reduce greenhouse gas and particularly carbon dioxide emissions by reducing energy consumption?</li> <li>• Does it incorporate zero or low carbon technologies?</li> <li>• Does it incorporate renewable energy technologies?</li> <li>• Will it include energy recovery?</li> <li>• Will it minimise the need to travel, particularly by private car by efficient land use patterns?</li> <li>• Will it lead to more sustainable travel including walking, cycling and public transport?</li> <li>• Will it enable the take up of low or ultra-low emission vehicles?</li> <li>• Does it result in the loss of a carbon storage function provided by a natural habitat?</li> <li>• Will it increase the carbon storage potential of a site/habitat?</li> <li>• Will it result in significant soil disturbance?</li> </ul>
<p>2. To adapt to the effects of a changing climate by protecting and managing water resources.</p>	<ul style="list-style-type: none"> <li>• Will it include measures to reduce water consumption?</li> <li>• Does it increase water abstraction?</li> <li>• Will it lead to an increase in impermeable surfaces?</li> <li>• Does it include a drainage strategy that incorporates SuDS and follows the 'treatment train'?</li> <li>• Are any proposed SuDS suitable for the site conditions?</li> <li>• Does it take account of the South East Water Management Plan?</li> <li>• Will it have an impact on the Pevensey Levels Ramsar site and SAC?</li> </ul>

Sustainability Appraisal Objective	Policy/Plan decision making guidance
<p>3. To adapt to and mitigate the risk of flooding from all sources taking account of the impact of climate change.</p>	<ul style="list-style-type: none"> <li>• Will the proposal be affected by flooding, i.e. is it within Flood Zone 2, 3a or 3b?</li> <li>• Does it take account of the ESCC Flood Risk Management Plan requirements?</li> <li>• Will it lead to increased surface water flooding?</li> <li>• Will it lead to sewer flooding?</li> <li>• Will it impact or increase the risk of flooding to other people and property?</li> <li>• Will it include flood mitigation measures where necessary?</li> <li>• Will it promote and include climate change adaptation measures?</li> <li>• Does it include a drainage strategy that incorporates SuDS?</li> <li>• Are any proposed SuDS suitable for the site conditions?</li> <li>• Does the proposal include opportunities to reduce flood risk to surrounding communities?</li> </ul>
<p>4. To reduce pollution (such as air, noise, light, water and soil), improve air and water quality and minimise impacts associated with development.</p>	<ul style="list-style-type: none"> <li>• Will it impact on natural resources, soil, air and water quality?</li> <li>• Will it reduce emissions of pollutants?</li> <li>• Will it impact on locations that are sensitive to air pollution?</li> <li>• Will it impact on noise levels?</li> <li>• Will it lead to more light pollution?</li> <li>• Does it improve water quality?</li> <li>• Does it include a drainage strategy that incorporates SuDS and follows the ‘treatment train’?</li> <li>• Are any proposed SuDS suitable for the site conditions?</li> <li>• Will it safeguard soil quality and quantity?</li> </ul>

Sustainability Appraisal Objective	Policy/Plan decision making guidance
<p>5. To protect and enhance existing habitats, species and biodiversity and deliver measurable biodiversity net gain.</p>	<ul style="list-style-type: none"> <li>• Will it impact on national, regional or local habitats and/or species?</li> <li>• Does it affect a site designated for nature conservation purposes?</li> <li>• Will it impact on access to nature?</li> <li>• Does it support ecosystems and lead to any enhancements in biodiversity, particularly in non-designated sites?</li> <li>• Will it lead to a biodiversity net gain?</li> <li>• Will it impact on the connectivity and/or function of habitat sites, biodiversity and species?</li> <li>• Will it identify/deliver opportunities for the restoration of natural process and natural interventions to enable climate resilient landscape for people and wildlife?</li> <li>• Will it create new green spaces?</li> <li>• Will it lead to a degradation or fragmentation of habitats?</li> <li>• Will it ensure continuity of ecological frameworks such as river corridors, coastal habitats, uplands, woodlands and scrub to enable free passage of specific habitat dependent species?</li> </ul>
<p>6. To prevent and reduce the amount of waste, and minimise the use of non-renewable resources.</p>	<ul style="list-style-type: none"> <li>• Will it prevent waste wherever it occurs?</li> <li>• Will it promote sustainable waste management, following the waste hierarchy, and reduce consumption of materials and resources?</li> <li>• Will it increase waste recycling?</li> <li>• Will it promote the use of energy recovered from waste?</li> </ul>

Sustainability Appraisal Objective	Policy/Plan decision making guidance
7. To protect and enhance the quality and range of natural green spaces and to improve the wider green infrastructure network.	<ul style="list-style-type: none"> <li>• Will it encourage the enhancement of the wider green infrastructure network?</li> <li>• Does it create green links/corridors between green spaces?</li> <li>• Will it lead to the loss of, or degradation to, assets that comprise the green infrastructure network i.e. hedgerows, trees, woodlands, watercourses, green spaces etc.?</li> <li>• Will the wider green infrastructure network be protected i.e. hedgerows, trees, woodlands, watercourses, green spaces etc.?</li> </ul>
8. To ensure development protects existing open spaces and creates open space in areas of deficiency, having regard to quantity and quality standards.	<ul style="list-style-type: none"> <li>• Will it increase or decrease public open space deficiency?</li> <li>• Does it meet the quality and quantity standards for the provision of open space?</li> <li>• Will it increase or decrease formal and informal recreational open space?</li> </ul>
9. To conserve and enhance the district's countryside, landscape, historic environment and cultural assets and improve accessibility as relevant.	<ul style="list-style-type: none"> <li>• Will it lead to the loss or degradation of designated spaces such as Local Green Space or the High Weald AONB?</li> <li>• Will local landscape quality, distinctiveness and character be protected?</li> <li>• Will the character and appearance of world heritage sites, designated archaeological sites, historic parks and gardens, battlefields and their settings be protected?</li> <li>• Is access for residents and visitors relatively easy?</li> <li>• Is 'access for all' incorporated into the proposal where appropriate?</li> </ul>
10. To ensure development makes efficient use of land, buildings and infrastructure, including previously developed land.	<ul style="list-style-type: none"> <li>• Will it optimise the use of previously developed land, buildings and existing infrastructure?</li> </ul>

Sustainability Appraisal Objective	Policy/Plan decision making guidance
	<ul style="list-style-type: none"> <li>• Will it lead to an unacceptable loss of greenfield sites or back garden land?</li> <li>• Does it incorporate sustainable design and construction practices?</li> <li>• Is there remediation of contaminated land?</li> </ul>
<p>11. To improve the quality of the built environment and promote high quality and sustainable urban design, including preserving and, where possible, enhancing the district's heritage assets and their settings.</p>	<ul style="list-style-type: none"> <li>• Will it affect the significance of heritage assets through direct impacts or impacts on their setting i.e. listed buildings, scheduled ancient monuments, historic parks and gardens, Conservation Areas?</li> <li>• Will the design enhance local character?</li> <li>• Have opportunities that make a positive contribution to the local character and area been identified?</li> <li>• Will it impact on any potential archaeological remains?</li> <li>• Will it promote adaptive re-use of buildings, sustainable design, sustainable construction, the use of locally sourced materials and low impact operation?</li> <li>• Does it have regard to the Conservation Area Appraisal, where one is relevant?</li> </ul>
<p>12. To provide a range of high quality homes, including affordable housing, to meet local needs.</p>	<ul style="list-style-type: none"> <li>• Will it increase the number of homes?</li> <li>• Will it increase the number of affordable homes?</li> <li>• Will it reduce the number of unsuitable/unfit homes?</li> <li>• Does it increase accessibility for wheelchair users?</li> <li>• Does it ensure homes are suitable for older residents i.e. designed specifically as such or include adaptability?</li> <li>• Does it ensure an appropriate tenure mix of housing is provided to meet local needs?</li> <li>• Does it provide for the needs of the gypsy and traveller community?</li> </ul>



Sustainability Appraisal Objective	Policy/Plan decision making guidance
	<ul style="list-style-type: none"> <li>• Does it ensure homes are built to Lifetime Homes Standards or equivalent?</li> </ul>
<p>13. To promote healthy, safe and inclusive communities, and promote equal opportunities including allowing people to remain independent.</p>	<ul style="list-style-type: none"> <li>• Will it impact on access and/or provision of health facilities?</li> <li>• Will it encourage healthy life styles?</li> <li>• Does it follow secure by design principles?</li> <li>• Will it contribute to a reduction in the actual crime level?</li> <li>• Will it contribute to a reduction in the fear of crime?</li> <li>• Will it be likely to increase public well-being?</li> <li>• Does it plan for the potential impacts of climate change on health?</li> </ul>
<p>14. To ensure access to local services and facilities, including local shopping, leisure facilities, sport and recreation opportunities.</p>	<ul style="list-style-type: none"> <li>• Is the proposal/land use located close to existing local services and facilities?</li> <li>• Will services and facilities be created?</li> <li>• Is public transport available and accessible to all?</li> <li>• Does it address the deficit in leisure, sport and recreation facilities where appropriate?</li> <li>• Will it result in the loss of local services and facilities i.e. local shops, community facilities etc.?</li> <li>• Will it improve accessibility to key local services?</li> <li>• Will it enable people to stay independent?</li> <li>• Does it improve access for all, such as for those with limited mobility, wheelchairs?</li> </ul>
<p>15. To reduce reliance on private transport modes, enable alternatives to the car, and enhance safer routes and permeability for walkers and cyclists.</p>	<ul style="list-style-type: none"> <li>• Will it impact on traffic congestion?</li> <li>• Will it enable the use of public transport?</li> <li>• Will it enable walking and cycling?</li> </ul>

Sustainability Appraisal Objective	Policy/Plan decision making guidance
	<ul style="list-style-type: none"> <li>• Is the proposal/land use in a location with public transport provision?</li> <li>• Will it make use of existing transport infrastructure?</li> <li>• Will it enable alternatives to the car?</li> <li>• Does it promote the inclusion of sustainable transport links within the district?</li> <li>• Is it located within good access to local services, facilities, open space etc.?</li> <li>• Will it minimise the need to travel by car through the location and design of new development and places which provide more opportunities for active travel and for the provision and link to public transport infrastructure</li> <li>• Are walking and cycling provision and links included?</li> <li>• Does it promote safe walking and cycling?</li> </ul>
<p>16. To increase the vitality, viability and uniqueness of the district's existing town centres, local centres and village centres.</p>	<ul style="list-style-type: none"> <li>• Will it promote and add to the vitality and viability of town centres, local centres and village centres?</li> <li>• If the site is located in a town centre, will it include retail and/or town centre uses?</li> <li>• Does it result in the loss of town centre uses i.e. shops (A1 use) to residential (C3 use)?</li> <li>• Does it reinforce a centres' retail role?</li> <li>• Will it stimulate the use of local companies, local products and services and provide other forms of community benefit?</li> <li>• Does it promote and add to the tourism economy of the district?</li> <li>• Is innovation, entrepreneurship and diversification encouraged, particularly in rural areas?</li> </ul>

Sustainability Appraisal Objective	Policy/Plan decision making guidance
<p>17. To promote sustainable economic growth and employment opportunities including access to high quality jobs.</p>	<ul style="list-style-type: none"> <li>• Will it help create the right conditions and infrastructure provision to encourage private sector investment?</li> <li>• Will it help improve the competitiveness and productivity of the local economy?</li> <li>• Will it help in achieving local economic growth?</li> <li>• Is innovation, entrepreneurship and diversification encouraged, particularly in rural areas?</li> <li>• Does it promote and add to the tourism economy of the district?</li> <li>• Does it provide the commercial floorspace the district needs to encourage/support new and existing business development?</li> <li>• Is the commercial floorspace/business units provided of a suitable size, type and in the right location?</li> <li>• Does it provide/create jobs?</li> <li>• Will it meet local business and employment needs?</li> <li>• Will it increase employment opportunities?</li> <li>• Will it increase training and skilled employment?</li> </ul>
<p>18. To improve the level of skills, education and training of the population.</p>	<ul style="list-style-type: none"> <li>• Will it deliver education and training opportunities?</li> <li>• Does it include education provision where necessary i.e. a new school?</li> <li>• Does it deliver opportunities for apprenticeships and vocational training?</li> </ul>

**Table 27: SA Objectives and Decision Making Guidance**

## Proposed methodology

5.6 In order to determine whether the policies, potential site allocations and the reasonable alternatives considered for these are compatible with the Sustainability Objectives, a simple appraisal methodology is proposed, to accompany the decision making guidance provided in Table 27 above. The assessment will need to be undertaken iteratively on each policy and site allocation of the Local Plan and through the Plan's development. The assessment will also consider the Local Plan as a whole.

5.7 The appraisal will be conducted on a four point scale as set out below.

<b>Unknown</b>	<b>Neutral</b>	<b>Positive</b>	<b>Negative</b>
?	o	+	-

5.8 Accompanying this appraisal system will be a commentary box containing a written description to help justify the appraisal, particularly where a topic could be subjective. A draft appraisal matrix for considering policy options is contained in Appendix D. A draft appraisal matrix for considering potential site allocations is contained in Appendix E.

5.9 When determining what level of appraisal should be applied for environmental issues, the criteria identified by the SEA Directive, as set out below, would be referred to, together with the decision making guidance in Table 27 above:

- 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); and
- the value and vulnerability of the area likely to be affected due to:
  - special natural characteristics or cultural heritage;
  - exceeded environmental quality standards or limit values;
  - intensive land-use; and
  - the effects on areas or landscapes which have a recognised national, community or international protection status.

5.10 For social and economic issues, professional judgement will be used to determine the appraisal, together with the decision making guidance in Table 27 above.

5.11 When applying the appraisal, it will normally be assumed that mitigation measures are not available. Instead, suggestions of how mitigation can be applied will be included in the commentary box. This aspect will be described in further detail in the Stage B Sustainability Appraisal Report.

## 6 Consulting on the Scope and Next Steps

### **Task A5 Consult on the scope of the SA with the relevant statutory bodies**

***“When deciding on the scope and level of detail of information that must be included in the report, the responsible authority shall consult the consultation bodies”***

***Regulation 12(5) of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations)***

***“Where a consultation body wishes to respond to a consultation under paragraph (5), it shall do so within the period of 5 weeks...”***

***Regulation 12(6) of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations)***

### **Consultation process**

6.1 In conformity with the requirements of the SEA Regulations, the draft SA/SEA Scoping Report was made available for comments for a five-week period from 8<sup>th</sup> July 2020 to 12<sup>th</sup> August 2020. The Council sought the views of the three statutory consultation bodies<sup>190</sup>, as well as our neighbouring local planning authorities; the Sussex Local Nature Partnership; Sussex Wildlife Trust; High Weald AONB Unit and Highways Authority. A number of comments were received from all parties consulted and these have been fully considered by the Council. Updates and changes to the SA/SEA Scoping Report have been made as appropriate.

### **What happens next?**

6.2 This SA/SEA Scoping Report is now being published alongside the Council's Direction of Travel document, as part of our early engagement consultation on the new Local Plan.

6.3 The next stages in the SA process are completed alongside the preparation of the Local Plan.

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<sup>190</sup> Regulation 4 of the SEA Regulations defines the statutory consultation bodies in England as being Historic England, Natural England and the Environment Agency



## Appendix A: Review of Plans, Policies and Programmes

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
<b>Level: International</b>			
UN Paris Climate Change Agreement (2016) <a href="https://unfccc.int/process-and-meetings/the-paris-agreement/the-paris-agreement">https://unfccc.int/process-and-meetings/the-paris-agreement/the-paris-agreement</a>	International agreement to keep global temperature rise this century well below 2 degrees Celsius above preindustrial levels.	To keep global temperature rise this century well below 2 degrees Celsius above preindustrial levels.	Need to ensure that the Local Plan and policies address the need to reduce CO <sub>2</sub> emissions. The spatial strategy and policies must ensure climate change is fully incorporated.
Kyoto Protocol on Climate Change, United Nations, 1997 <a href="https://unfccc.int/resource/docs/convkp/kpeng.pdf">https://unfccc.int/resource/docs/convkp/kpeng.pdf</a>	Came into force in 2015. This sets legally binding emissions reduction targets for developed countries that have ratified it.	Has set in place legally binding emission reductions targets for developed countries that have ratified it.	
UN Resolution 2015 Transforming our world: The 2030 Agenda for Sustainable Development <a href="https://sustainabledevelopment.un.org/post2015/transformingourworld">https://sustainabledevelopment.un.org/post2015/transformingourworld</a>	Details a set of 17 Goals which were adopted by all UN Member States in 2015, as part of the 2030 Agenda for Sustainable Development which set out a 15-year plan to achieve the Goals.	Overall aim of the 17 Goals is to end poverty, protect the planet and improve the lives and prospects of everyone.	Consider the 17 Sustainable Development Goals set out by the Agenda and adapt/incorporate as appropriate to the Local Plan and policies.
World Health Organisation (WHO) Age Friendly Communities	A growing number of cities and communities worldwide are striving	The WHO Global Network for Age-friendly Cities and Communities (the Network)	The Local Plan and SA need to consider the development of

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
<a href="https://www.who.int/ageing/projects/age_friendly_cities_network/en/">https://www.who.int/ageing/projects/age_friendly_cities_network/en/</a>	<p>to better meet the needs of their older residents. The WHO Global Network for Age-friendly Cities and Communities (the Network) was established to foster the exchange of experience and mutual learning between cities and communities worldwide.</p> <p>Cities and communities in the Network are of different sizes and are located in different parts of the world. Their efforts to become more age-friendly take place within very diverse cultural and socio-economic contexts. What all members of the Network do have in common is the desire and commitment to promote healthy and active ageing and a</p>	<p>was established to foster the exchange of experience and mutual learning between cities and communities worldwide</p>	<p>age friendly communities moving forward.</p>



Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
	good quality of life for their older residents		
<p>UN Decade on Ecosystem Restoration 2021 – 2030</p> <p><a href="https://www.decadeonrestoration.org/">https://www.decadeonrestoration.org/</a></p>	<p>This globally-coordinated response to the loss and degradation of habitats will focus on building political will and capacity to restore humankind's relation with nature. It is also a direct response to the call from science, as articulated in the <u>Special Report on Climate Change and Land</u> of the Intergovernmental Panel on Climate Change, and to the decisions taken by all UN Member States in the Rio Conventions on <u>climate change and biodiversity</u>, and the <u>UN Convention to Combat Desertification</u>.</p>	<p>To prevent, halt and reverse the degradation of ecosystems worldwide</p>	<p>Need to consider the aim of this work in the Local Plan policies and the SA.</p>
<p>CC special report on the Impacts of Global Warming above 1.5°C</p> <p><a href="https://www.ipcc.ch/sr15/">https://www.ipcc.ch/sr15/</a></p>	<p>An IPCC special report on the impacts of global warming of 1.5 °C above pre-industrial levels and related global greenhouse</p>	<p>To maintain the increase in global warming below 1.5°C above preindustrial levels. To look towards reducing the global temperature.</p>	<p>Need to ensure that the Local Plan and policies address the need to reduce CO<sub>2</sub> emissions. The spatial strategy and</p>

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
	gas emission pathways, in the context of strengthening the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty.		policies must ensure climate change is fully incorporated.
International Convention on Wetlands (Ramsar Convention) (1976)  <a href="https://www.ramsar.org/">https://www.ramsar.org/</a>	This is the intergovernmental treaty that provides the framework for the conservation and wise use of wetlands and their resources. The Convention was adopted in the Iranian city of Ramsar in 1971 and came into force in 1975.	The Ramsar Convention's broad aims are to halt the worldwide loss of wetlands and to conserve, through wise use and management, those that remain. This requires international cooperation, policy making, capacity building and technology transfer.	The Pevensey Levels is a designated Ramsar site and so the Local Plan must ensure that the spatial strategy and policies take full account of the sites conservation status and aims.
<b>Level: European</b>			
The Habitats Directive 1992 Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora  <a href="https://ec.europa.eu/environment/nature/legislation/habitatsdirective/index_en.htm">https://ec.europa.eu/environment/nature/legislation/habitatsdirective/index_en.htm</a>	To ensure the conservation of a wide range of rare, threatened or endemic animal and plant species. Some habitat types are also targeted for conservation in their own right.	Promote the maintenance of biodiversity taking account of economic, social, cultural and regional requirements. Conservation of natural habitats and maintain landscape features of	The Local Plan and SA needs to include robust policies to protect SACs, SPAs and Ramsar sites. Need to consider biodiversity net gain as a part of this.

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
		importance to wildlife and fauna.	
<p>European Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) (1979)</p> <p><a href="https://www.coe.int/en/web/bern-convention">https://www.coe.int/en/web/bern-convention</a></p>	<p>The Convention on the Conservation of European Wildlife and Natural Habitats (the Bern Convention) was adopted in Bern, Switzerland in 1979, and came into force in 1982. It is a binding international legal instrument for nature conservation that covers the natural heritage of the European continent and some African states.</p> <p>The UK Government ratified the Bern Convention in 1982. The obligations of the Convention are transposed into UK law by means of the Wildlife and Countryside Act (1981 as amended), Nature Conservation (Scotland) Act 2004 (as amended), Wildlife (Northern Ireland)</p>	<p>Aims to ensure conservation and protection of wild plant and animal species and their natural habitats, to increase cooperation between contracting parties, and to regulate the exploitation of those species (including migratory species).</p>	<p>Needs to ensure species are protected as appropriate in the Local Plan and nature conservation policies. The SA needs to consider this carefully in line with the Habitats Regulations Assessment of the Local Plan.</p>

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
	Order 1985, and the Nature Conservation and Amenity Lands (Northern Ireland) Order 1985.		
<p>European Air Quality Framework Directive (1996) and Air Quality Directive (2008)</p> <p><a href="http://eur-lex.europa.eu/LexUriServ/site/en/consleg/1996/L/01996L0062-20031120-en.pdf">http://eur-lex.europa.eu/LexUriServ/site/en/consleg/1996/L/01996L0062-20031120-en.pdf</a></p> <p><a href="https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2008:152:0001:0044:EN:PDF">https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2008:152:0001:0044:EN:PDF</a></p>	<p>The 1996 Directive itself did not create any precise air quality objectives, but rather it set out a framework and basic principles for ambient air quality monitoring and management. These were to go into effect once daughter directives for specific pollutants had been adopted.</p> <p>The 2008 Directive sets legally binding limits for concentrations in outdoor air of major air pollutants that impact public health such as particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) and nitrogen dioxide (NO<sub>2</sub>).</p>	To protect the environment and human health from major air pollutants.	The Local Plan and SA will need to ensure any proposals take into account the potential for increases in major air pollutants that impact public health such as particulate matter (PM <sub>10</sub> and PM <sub>2.5</sub> ) and nitrogen dioxide (NO <sub>2</sub> ).
The Wild Birds Directive 2009/147/EC	Europe is home to more than 500 wild bird species, but at least 32 %	Habitat loss and degradation are the most serious threats to the conservation of wild birds.	The Local Plan and SA will need to ensure that policies seek to protect the Ashdown

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
<a href="https://ec.europa.eu/environment/nature/legislation/birdsdirective/index_en.htm">https://ec.europa.eu/environment/nature/legislation/birdsdirective/index_en.htm</a>	<p>of the EU's bird species are currently not in a good conservation status. The Birds Directive aims to protect all of the 500 wild bird species naturally occurring in the European Union.</p>	<p>The Directive therefore places great emphasis on the protection of habitats for endangered and migratory species. It establishes a network of Special Protection Areas (SPAs) including all the most suitable territories for these species. Since 1994, all SPAs are included in the Natura 2000 ecological network, set up under the Habitats Directive 92/43/EEC.</p>	<p>Forest SPA from harm as a result of development. The overall spatial strategy, development management policies and site allocations will need to take this into account.</p>
<p>The EU Water Framework Directive 2000/60/EC</p> <a href="https://ec.europa.eu/environment/water/water-framework/index_en.html">https://ec.europa.eu/environment/water/water-framework/index_en.html</a>	<p>The Directive commits European Union member states to achieve good qualitative and quantitative status of all water bodies (including marine waters up to one nautical mile from shore) by 2015. This includes good 'chemical' and good 'ecological' status.</p>	<p>The Directive sets out rules to halt deterioration in the status of European Union (EU) water bodies and achieve 'good status' for Europe's rivers, lakes and groundwater by 2015. Specifically, this includes:</p> <ul style="list-style-type: none"> <li>• protecting all forms of water (surface, ground, inland and transitional);</li> <li>• restoring the ecosystems in and around these bodies of water;</li> <li>• reducing pollution in water bodies; and</li> </ul>	<p>The Local Plan and SA need to consider the requirements of the Directive when drafting development management policies on water resources as the aim of 'good status' has not been met for relevant waterbodies in the district i.e. the Pevensy Levels.</p>

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
		<ul style="list-style-type: none"> <li>• guaranteeing sustainable water usage by individuals and businesses.</li> </ul> <p>The legislation places clear responsibilities on national authorities. They have to:</p> <ul style="list-style-type: none"> <li>• identify the individual river basins on their territory — that is, the surrounding land areas that drain into particular river systems;</li> <li>• designate authorities to manage these basins in line with the EU rules;</li> <li>• analyse the features of each river basin, including the impact of human activity and an economic assessment of water use;</li> <li>• monitor the status of the water in each basin;</li> <li>• register protected areas, such as those used for drinking water, which require special attention;</li> <li>• produce and implement ‘river-basin management plans’ to</li> </ul>	

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
		<p>prevent deterioration of surface water, protect and enhance groundwater and preserve protected areas;</p> <ul style="list-style-type: none"> <li>• ensure the cost of water services is recovered so that the resources are used efficiently and polluters pay; and</li> <li>• provide public information and consultation on their river-basin management plans.</li> </ul>	
<p>Environmental Noise Directive 2002/49/EC</p> <p><a href="https://ec.europa.eu/environment/noise/directive_en.htm">https://ec.europa.eu/environment/noise/directive_en.htm</a></p>	<p>This Directive is the main EU instrument to identify noise pollution levels and to trigger the necessary action both at Member State and at EU level.</p> <p>The Directive applies to noise to which humans are exposed, particularly in built-up areas, in public parks or other quiet areas in an agglomeration, in quiet areas in open country, near schools, hospitals and other noise-sensitive buildings and</p>	<p>To pursue its stated aims, the Environmental Noise Directive focuses on three action areas:</p> <ul style="list-style-type: none"> <li>• the determination of exposure to environmental noise;</li> <li>• ensuring that information on environmental noise and its effects is made available to the public; and</li> <li>• preventing and reducing environmental noise where necessary and preserving environmental noise quality where it is good.</li> </ul>	<p>The Local Plan and SA need to consider the potential noise impact the proposed spatial strategy, policies and site allocations will have.</p>

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
	<p>areas. It does not apply to noise that is caused by the exposed person himself, noise from domestic activities, noise created by neighbours, noise at work places or noise inside means of transport or due to military activities in military areas.</p>	<p>The Directive requires Member States to prepare and publish, every 5 years, noise maps and noise management action plans.</p>	
<p>European Industrial Emission Directive (2010)</p> <p><a href="https://www.eea.europa.eu/policy-documents/directive-2010-75-ec-on">https://www.eea.europa.eu/policy-documents/directive-2010-75-ec-on</a></p>	<p>The IED is the successor of the IPPC Directive and in essence, it is about minimising pollution from various industrial sources throughout the European Union.</p>	<p>The Directive lays down rules on integrated prevention and control of pollution arising from industrial activities. It also lays down rules designed to prevent or, where that is not practicable, to reduce emissions into air, water and land and to prevent the generation of waste, in order to achieve a high level of protection of the environment taken as a whole.</p>	<p>The Local Plan and SA need to consider the potential for reducing waste, controlling pollution and reducing emissions from industry/commercial activities within the spatial strategy and policies.</p>
<p>European Floods Directive (2007)</p> <p><a href="https://ec.europa.eu/environment/water/flood_risk/">https://ec.europa.eu/environment/water/flood_risk/</a></p>	<p>This Directive requires Member States to assess if all water courses and coast lines are at risk from flooding, to map the</p>	<p>Its aim is to reduce and manage the risks that floods pose to human health, the environment, cultural heritage and economic activity.</p>	<p>The Local Plan and SA need to consider the risk of flooding from all sources and ways to manage this through the spatial strategy and policies.</p>



Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
	<p>flood extent and assets and humans at risk in these areas and to take adequate and coordinated measures to reduce this flood risk. With this Directive also reinforces the rights of the public to access this information and to have a say in the planning process.</p>		
<p>European Energy Performance of Buildings Directive (2010)</p> <p>European Energy Efficiency Directive (2012)</p> <p><a href="https://ec.europa.eu/energy/topics/energy-efficiency/energy-efficient-buildings/energy-performance-buildings-directive_en?redir=1">https://ec.europa.eu/energy/topics/energy-efficiency/energy-efficient-buildings/energy-performance-buildings-directive_en?redir=1</a></p> <p><a href="https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv%3AOJ.L.2018.156.01.0075.01.ENG">https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv%3AOJ.L.2018.156.01.0075.01.ENG</a></p>	<p>The building sector is crucial for achieving the EU's energy and environmental goals. At the same time, better and more energy efficient buildings improve the quality of citizens' life while bringing additional benefits to the economy and society.</p> <p>To boost energy performance of buildings, the EU has established a legislative framework that includes the Energy Performance of Buildings</p>	<p>Together, the directives promote policies that will help:</p> <ul style="list-style-type: none"> <li>• achieve a highly energy efficient and decarbonised building stock by 2050;</li> <li>• create a stable environment for investment decisions; and</li> <li>• enable consumers and businesses to make more informed choices to save energy and money.</li> </ul>	<p>The Local Plan and SA need to ensure robust energy efficiency policies and requirements are included within policies.</p>

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
	<p>Directive 2010/31/EU (EPBD) and the Energy Efficiency Directive 2012/27/EU.</p> <p>Both directives were amended, as part of the Clean energy for all Europeans package, in 2018 and 2019. In particular, the Directive amending the Energy Performance of Buildings Directive (2018/844/EU) introduces new elements and sends a strong political signal on the EU's commitment to modernise the buildings sector in light of technological improvements and increased building renovations.</p>		
<b>Level: National</b>			
<p>The Climate Change Act 2008</p> <p><a href="https://www.legislation.gov.uk/ukpga/2008/27/contents">https://www.legislation.gov.uk/ukpga/2008/27/contents</a></p>	<p>The Act makes it the duty of the Secretary of State to ensure that the net UK carbon account for all six</p>	<p>To ensure that by 2050 the UK greenhouse gas emissions are 80% lower than 1990 baseline.</p>	<p>The Local Plan and SA need to ensure that the spatial strategy and policies will help achieve</p>

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
	<p>Kyoto greenhouse gases for the year 2050 is at least 80% lower than the 1990 baseline, toward avoiding dangerous climate change. The Act aims to enable the United Kingdom to become a low-carbon economy and gives ministers powers to introduce the measures necessary to achieve a range of greenhouse gas reduction targets.</p> <p>This has been amended by the Climate Change Act 2008 (2050 Target Amendment) Order 2019 (see below).</p>		<p>the target set by addressing local emissions.</p>
<p>The Climate Change Act 2008 (2050 Target Amendment) Order 2019</p> <p><a href="http://www.legislation.gov.uk/ukxi/2019/1056/contents/made">http://www.legislation.gov.uk/ukxi/2019/1056/contents/made</a></p>	<p>This amends the legally binding target to reduce greenhouse gas (GHG) emissions set out in section 1 of the Climate Change Act 2008 (CCA 2008) from 80% to 100%, or net zero by 2050.</p>	<p>To reduce greenhouse gas (GHG) emissions to 100% lower than the 1990 baseline, effectively net zero by 2050.</p>	<p>The Local Plan and SA need to ensure that the spatial strategy and policies will help achieve the target set by addressing local emissions.</p> <p>The Plan should look to encourage low or zero</p>

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
<p>The Climate Change Committee: Net Zero – The UK’s Contribution to Stopping Global Warming (2019)</p> <p><a href="https://www.theccc.org.uk/wp-content/uploads/2019/05/Net-Zero-The-UKs-contribution-to-stopping-global-warming.pdf">https://www.theccc.org.uk/wp-content/uploads/2019/05/Net-Zero-The-UKs-contribution-to-stopping-global-warming.pdf</a></p>	<p>The Committee on Climate Change recommended that the Government should legislate a net-zero greenhouse gas target for 2050. To deliver on the commitment that the UK made by signing the Paris Agreement. It is achievable with known technologies, alongside improvements in people’s lives, and within the expected economic cost that Parliament accepted when it legislated the existing 2050 target for an 80% reduction from 1990.</p>	<p>The emissions target for the UK is to make sure there is net-zero greenhouse gas emissions by 2050.</p>	<p>emission policies where possible.</p>
<p>The Climate Change Committee: Legal duties on climate change</p> <p><a href="https://www.theccc.org.uk/what-is-climate-change/the-legal-landscape/">https://www.theccc.org.uk/what-is-climate-change/the-legal-landscape/</a></p>	<p>Legal 2050 target for emissions reductions, five-yearly ‘carbon budgets’ (limits on emissions over a set time period), and the development of a climate change adaptation plan.</p>	<p>To reduce carbon emissions by working towards a set of five-yearly ‘carbon budgets’, which are limits on emissions over a set time period that act as stepping stones towards the 2050 target.</p>	

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
<p>National Planning Policy Framework (NPPF, 2019)</p> <p><a href="https://www.gov.uk/government/publications/national-planning-policy-framework--2">https://www.gov.uk/government/publications/national-planning-policy-framework--2</a></p>	<p>The National Planning Policy Framework sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans for housing and other development can be produced.</p>	<p>The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.</p> <p>Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways:</p> <ul style="list-style-type: none"> <li>a) an economic objective – to help build a strong, responsive and competitive economy;</li> <li>b) a social objective – to support strong, vibrant and healthy communities; and</li> <li>c) an environmental objective – to contribute</li> </ul>	<p>Sustainability appraisal should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.</p> <p>The principles and requirements of national policy will need to be embedded within the SA and Local Plan</p>

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		<p>to protecting and enhancing our natural, built and historic environment.</p> <p>These objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework.</p> <p>So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development.</p>	
<p>National Planning Practice Guidance (NPPG)</p> <p><a href="https://www.gov.uk/government/collections/planning-practice-guidance">https://www.gov.uk/government/collections/planning-practice-guidance</a></p>	<p>The National Planning Practice Guidance (NPPG) is a government website described as ‘the home of the National Planning Policy Framework for England and supporting national planning practice guidance’.</p>	<p>The National Planning Practice Guidance provides technical guidance on a number of topic areas in order to support policies set out within the NPPF. It aims to allow for sustainable development as guided by the NPPF. It is a document that’s been updated several times since its first publication in 2014.</p>	<p>The principles and requirements of national policy will need to be embedded within the SA and Local Plan.</p>

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<p>Conservation of Species and Habitats Regulations 2017</p> <p><a href="http://www.legislation.gov.uk/uksi/2017/1012/contents/made">http://www.legislation.gov.uk/uksi/2017/1012/contents/made</a></p>	<p>The Conservation of Habitats and Species Regulations 2017, amended by the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018) sets out requirements 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.</p>	<p>Seeks to ensure that plans or projects do not adversely affect the protected features of a habitats site, taking account of the need for mitigation where appropriate.</p>	<p>The Local Plan and SA need to ensure Ashdown Forest SAC and SPA and Pevensey Levels SAC are protected in policy.</p>
<p>A Green Future: Our 25 Year Plan to Improve the Environment</p> <p><a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf</a></p>	<p>Sets out government action to help the natural world regain and retain good health. It calls for an approach to agriculture, forestry, land use and fishing that puts the environment first.</p>	<p>The Plan aims to deliver cleaner air and water in cities and rural landscapes, protect threatened species and provide richer wildlife habitats. The goals are:</p> <ol style="list-style-type: none"> <li>1. Clean air;</li> <li>2. Clean and plentiful water;</li> <li>3. Thriving plants and wildlife;</li> </ol>	<p>The Local Plan and SA need to ensure that the spatial strategy and policies seek to pursue the goals set out in the government's plan at the local level.</p>

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
		<ol style="list-style-type: none"> <li>4. A reduced risk of harm from environmental hazards such as flooding and drought;</li> <li>5. Using resources from nature more sustainably and efficiently;</li> <li>6. Enhanced beauty, heritage and engagement with the natural environment;</li> <li>7. Mitigating and adapting to climate change;</li> <li>8. Minimising waste;</li> <li>9. Managing exposure to chemicals; and</li> <li>10. Enhancing biosecurity.</li> </ol>	
<p>The South Inshore and Offshore Marine Plan (July 2018)</p> <p><a href="https://www.gov.uk/government/publications/the-south-marine-plans-documents">https://www.gov.uk/government/publications/the-south-marine-plans-documents</a></p>	<p>The Plan will help ensure that the right activities happen in the right place and in the right way within the marine environment. It provides a framework that will shape and inform decisions over how the areas' waters are developed, protected and improved over the next 20 years</p>	<p>Through its vision for economic, environmental and social prosperity, the South Marine Plan will safeguard environments such as the UNESCO-recognised Jurassic coast, enable sustainable use of its shipping channels, encourage growth in local sectors such as tourism, and protect and enhance essential natural defences against</p>	<p>The Local Plan and SA process will need to take account of the Marine Plan's objectives particularly in dealing with the part of the district on the coast – Pevensey Bay.</p>



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		<p>climate change and flooding. This will be achieved through its 12 objectives, the use of natural capital and supporting local policies, all of which have been developed in partnership with local and national organisations, representatives and users of the area</p>	
<p>Environment Bill 2020  <a href="https://www.gov.uk/government/publications/environment-bill-2020/30-january-2020-environment-bill-2020-policy-statement">https://www.gov.uk/government/publications/environment-bill-2020/30-january-2020-environment-bill-2020-policy-statement</a></p>	<p>The Environment Bill 2020 sets out how the government plan to protect and improve the natural environment in the UK. The Environment Bill will help deliver the government's manifesto commitment to delivering the most ambitious environmental programme of any country on earth. It is part of the wider government response to the clear and scientific case, and growing public demand, for a step-change in environmental protection and recovery.</p>	<p>The Bill sets out five principles for policies:</p> <ul style="list-style-type: none"> <li>• the protection of the environment should be integrated into policy-making;</li> <li>• preventative action to be taken to avert environmental damage;</li> <li>• to be precautionary;</li> <li>• the environmental damage is to be rectified at the source; and</li> <li>• those who produce pollution should bear the costs of managing it.</li> </ul>	<p>The five principles of the Bill will need to be considered in the Local Plan and its policies as well as through the SA process.</p>

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	<p>Acting as one of the key vehicles for delivering the bold vision set out in the 25 Year Environment Plan, the Environment Bill brings about urgent and meaningful action to combat the environmental and climate crisis we are facing. It sets a new and ambitious domestic framework for environmental governance and helps to deliver on the government's commitment to be the first generation to leave our environment in a better state.</p>		
<p>Planning Policy for Traveller Sites</p> <p><a href="https://www.gov.uk/government/publications/planning-policy-for-traveller-sites">https://www.gov.uk/government/publications/planning-policy-for-traveller-sites</a></p>	<p>This sets out guidance for Local Authorities to set pitch targets for gypsies and travellers and plot targets for travelling showpeople, which addresses the likely permanent and transit site</p>	<p>The aims are to:</p> <ul style="list-style-type: none"> <li>• Develop fair and effective strategies to meet need through the identification of land for sites;</li> </ul>	<p>Identify and update annually the supply of deliverable sites against locally set targets. Also to identify developable broad locations for growth. The number of pitches or plots on sites will need to consider the location, size and the local</p>

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	accommodation needs of travellers in their area.	<ul style="list-style-type: none"> <li>• To increase the number of traveller sites in appropriate locations;</li> <li>• Limit tensions between settled and traveller communities;</li> <li>• To enable travellers access to education, health, welfare and employment infrastructure; and</li> <li>• To have due regard to the protection of the local amenity and local environment.</li> </ul>	population size and density. The local amenity and environment will also need to be protected.
Housing White Paper: Fixing our broken housing market  <a href="https://www.gov.uk/government/publications/fixing-our-broken-housing-market">https://www.gov.uk/government/publications/fixing-our-broken-housing-market</a>	A housing white paper setting out the government's plans to reform the housing market and boost the supply of new homes in England	To provide from 225,000 to 275,000 or more homes per year to keep up with population growth and start to tackle years of under-supply. This target has since risen to 300,000 additional homes in England per year by the mid-2020s.	The Local Plan and SA will need to have regard to this White Paper and its targets, although a number of the proposed reforms have been translated into the NPPF (2019)
Flood Risk Management Act (2010)  <a href="https://www.gov.uk/guidance/flood-risk-management-information-for-flood-risk-management-authorities-asset-owners-and-local-authorities">https://www.gov.uk/guidance/flood-risk-management-information-for-flood-risk-management-authorities-asset-owners-and-local-authorities</a>	With climate projections suggesting that extreme weather will happen more frequently in the future, this act aims to reduce the flood risk associated	The key aims of the Act are: <ul style="list-style-type: none"> <li>• To reduce the risk of flooding from all sources; and</li> <li>• To make sure the risk is reduced sufficiently enough for a 1 in 200 year event.</li> </ul>	The Local Plan and SA will need to ensure flood risk is fully taken account of through the sequential and exceptions tests when considering policy options and sites.

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	<p>with extreme weather. It also provides for better, more comprehensive management of flood risk for people, homes and businesses, helps safeguard community groups from unaffordable rises in surface water drainage charges, and protects water supplies to the consumer.</p>		<p>Any policies will need to consider the potential requirement to designate structures and features for flood and coastal erosion risk management.</p>
<p>The Environment Agency River Basin Management Plan South East River Basin District (2009)</p> <p><a href="https://www.gov.uk/government/publications/south-east-river-basin-management-plan">https://www.gov.uk/government/publications/south-east-river-basin-management-plan</a></p>	<p>Set of documents that set out the 2009 objectives for protecting and improving the water environment under the Water Framework Directive, and the programme of measures to achieve them.</p>	<p>The key aims are:</p> <ul style="list-style-type: none"> <li>• By 2015, 18% of surface waters (rivers, lakes, estuaries and coastal waters) are going to improve for at least one biological, chemical or physical element, measured as part of an assessment of good status according to the Water Framework Directive;</li> <li>• By 2015, 23% of surface waters will be at good or better ecological status/potential and 33% of</li> </ul>	<p>The majority of waterbodies in the district have failed to meet the aims set out. The Local Plan and SA process will need to ensure that the spatial strategy and any development policies/site allocations take account of the need to ensure water quality is improved within the district, particularly for those waterbodies covered by the Water Framework Directive.</p> <p>Regard to future River Basin Management Plans will also be needed.</p>

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		<p>groundwater bodies will be at good status;</p> <ul style="list-style-type: none"> <li>• By 2015, at least 47% of assessed surface waters will be at good or better biological status.</li> </ul>	
<p>Thames River basin district river basin management plan (2015)</p> <p><a href="https://www.gov.uk/government/publications/thames-river-basin-district-river-basin-management-plan">https://www.gov.uk/government/publications/thames-river-basin-district-river-basin-management-plan</a></p>	<p>This document sets out the:</p> <ul style="list-style-type: none"> <li>• Current state of the water environment;</li> <li>• Pressures affecting the water environment;</li> <li>• environmental objectives for protecting and improving the waters;</li> <li>• programme of measures, actions needed to achieve the objectives;</li> <li>• progress since the 2009 plan</li> </ul>	<p>The document provides an update to the objectives and targets of the 2009 Thames RBMP</p>	<p>Consider as appropriate the findings of the update.</p>
<p>South East River basin district river basin management plan (2015)</p> <p><a href="https://www.gov.uk/government/publications/south-east-river-basin-">https://www.gov.uk/government/publications/south-east-river-basin-</a></p>	<p>This document sets out the:</p> <ul style="list-style-type: none"> <li>• Current state of the water environment;</li> </ul>	<p>The document provides an update to the objectives and targets of the 2009 South East RBMP</p>	<p>Consider as appropriate the findings of the update.</p>

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<a href="#">district-river-basin-management-plan</a>	<ul style="list-style-type: none"> <li>• Pressures affecting the water environment;</li> <li>• environmental objectives for protecting and improving the waters;</li> <li>• The programme of measures, actions needed to achieve the objectives;</li> <li>• progress since the 2009 plan</li> </ul>		
<p>Cuckmere and Sussex Havens CFMP (2009)</p> <p><a href="https://www.gov.uk/government/publications/cuckmere-and-sussex-havens-catchment-flood-management-plan">https://www.gov.uk/government/publications/cuckmere-and-sussex-havens-catchment-flood-management-plan</a></p>	<p>Provides an overview of the flood risk across the river catchment and recommended ways of managing the risk now and over the next 50-100 years.</p>	<p>The key aim of the document is to promote more sustainable approaches to managing flood risk.</p>	<p>The CFMP should be used by WDC to inform the distribution of development for the new Local Plan as well as formulating flood risk policies.</p>
<p>Cuckmere and Pevensey Levels Abstraction Licencing Strategy (March 2019)</p> <p><a href="https://www.gov.uk/government/publications/cuckmere-and-pevensey-levels-catchment-abstraction-licencing-strategy">https://www.gov.uk/government/publications/cuckmere-and-pevensey-levels-catchment-abstraction-licencing-strategy</a></p>	<p>Sets out how the Environment Agency manages water resources in the Cuckmere and Pevensey Levels catchment</p>	<p>The key objective is to ensure that RBMP objectives for water resources activities are met and that a deterioration in water quality / quantity is avoided.</p>	<p>The Strategy must be taken into account when looking at the quantum and distribution of new development within the Local Plan and through the SA process.</p>

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
<p>Adur &amp; Ouse Abstraction Licencing Strategy (March 2019)</p> <p><a href="https://www.gov.uk/government/publications/adur-and-ouse-catchment-abstraction-licensing-strategy">https://www.gov.uk/government/publications/adur-and-ouse-catchment-abstraction-licensing-strategy</a></p>	<p>Sets out how the Environment Agency manages water resources in the Adur &amp; Ouse catchment</p>	<p>The key objective is to ensure that RBMP objectives for water resources activities are met and that a deterioration in water quality / quantity is avoided.</p>	<p>As appropriate to those parts of the district subject to this Strategy, it must be taken into account when looking at the quantum and distribution of new development within the Local Plan and through the SA process.</p>
<p>Wildlife and Countryside Act 1981 (as amended)</p> <p><a href="https://www.legislation.gov.uk/ukpga/1981/69/contents">https://www.legislation.gov.uk/ukpga/1981/69/contents</a></p>	<p>The Act gives protection to native species, controls the release of non-native species, enhances the protection of Sites of Special Scientific Interest and builds upon the rights of way rules in the National Parks and Access to the Countryside Act 1949</p>	<p>The key objective is to protect native species; control non-native species; enhance the protection of SSSIs and build on the rights of way rules.</p>	<p>As with all legislation, the Act must be taken into account in formulating the local plan and policies.</p>
<p>Natural Environment and Rural Communities Act 2006</p> <p><a href="https://www.legislation.gov.uk/ukpga/2006/16/contents/enacted">https://www.legislation.gov.uk/ukpga/2006/16/contents/enacted</a></p>	<p>Section 40 of the NERC Act places a duty to conserve <a href="#">biodiversity</a> on public authorities in England. Section 41 requires the Secretary of State to publish and maintain lists of species and types of habitats</p>	<p>The key objective is to protect biodiversity and species within England.</p>	<p>As with all legislation, the Act must be taken into account in formulating the local plan and policies.</p>

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	<p>which are regarded by <a href="#">Natural England</a> to be of "principal importance" for the purposes of conserving biodiversity in England</p>		
<p>Environmental Noise England Regulations 2006</p> <p><a href="http://www.legislation.gov.uk/ukxi/2006/2238/contents/made">http://www.legislation.gov.uk/ukxi/2006/2238/contents/made</a></p>	<p>These Regulations (as amended) transpose the Environmental Noise Directive into domestic law for England. These Regulations apply to environmental noise, mainly from transport. The regulations require regular noise mapping and action planning for road, rail and aviation noise and noise in large urban areas (agglomerations).</p> <p>They also require the government to produce Noise Action Plans based on the maps for road and rail noise and noise in agglomerations. The Action Plans identify</p>	<p>Noise needs to be considered, any potential additional noise needs to be sensitive to the existing noise environment.</p> <p>Applies to environmental noise, mainly from transport. Requires regular noise mapping and action planning for road, rail and aviation noise and noise in large urban areas</p>	<p>The Local Plan and SA process will need to potentially identify areas exposed to the highest levels of noise and suggests ways this can be reduced. Also consider the need for noise management policies in specific areas of the district.</p>



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	<p>Important Areas (areas exposed to the highest levels of noise) and suggests ways the relevant authorities can reduce these. Major airports and those which affect agglomerations are also required to produce and publish their own Noise Action Plans separately.</p>		
<p>The Autonomous and Electric Vehicles Act 2018</p> <p><a href="http://www.legislation.gov.uk/ukpga/2018/18/contents/enacted">http://www.legislation.gov.uk/ukpga/2018/18/contents/enacted</a></p>	<p>This Act provides a framework in which electric vehicles, or ‘ultra-low emission vehicles’ (ULEVs) can grow. The decarbonisation of both private cars and goods and passenger carrying vehicles is seen as vital to helping the UK achieve its climate change obligations and to improving air quality. The Act also encourages investors in autonomous vehicles and updates to insurance protocols</p>	<p>The main objectives are:</p> <ul style="list-style-type: none"> <li>• For almost every car and van to be a zero emission vehicle by 2050;</li> <li>• To improve the consumer experience of electric vehicle charging infrastructure, to ensure provision at key strategic locations and to require that charge points have ‘smart’ capability; and</li> <li>• To provide a good insurance protocol for autonomous vehicles.</li> </ul>	<p>The Local Plan and SA need to consider ways to encourage the use of zero or ultra-low emissions private, goods and passenger carrying vehicles. The need for a comprehensive EV charging network will require significant consideration as to its development and delivery.</p>

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
	regarding events involving autonomous vehicles.		
<p>The Future Homes Standard: changes to Part L and Part F of Building Regulations for new dwellings</p> <p><a href="https://www.gov.uk/government/consultations/the-future-homes-standard-changes-to-part-l-and-part-f-of-the-building-regulations-for-new-dwellings">https://www.gov.uk/government/consultations/the-future-homes-standard-changes-to-part-l-and-part-f-of-the-building-regulations-for-new-dwellings</a></p>	<p>Provides proposed options to increase the energy efficiency requirements for new homes in 2020. The Future Homes Standard will require new build homes to be future-proofed with low carbon heating and world-leading levels of energy efficiency which will be introduced by 2025.</p>	<p>The key aims are:</p> <ul style="list-style-type: none"> <li>• To provide a 20% reduction in CO<sub>2</sub> emissions from new buildings compared to the current standards via either 'Future Homes Fabric' or by using 'Fabric plus technology';</li> <li>• To provide 31% reduction in CO<sub>2</sub> from new dwellings, compared to the current standards; and</li> <li>• To improve ventilation systems in new homes and better air flows.</li> </ul>	<p>The Local Plan and SA need to consider how to encourage low carbon and energy efficient new developments i.e. through design codes. Consideration as to how to implement and measure the new regulations for ventilation systems and air flow rates for mechanical systems in all new dwellings will be needed.</p>
<p>The Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015</p> <p><a href="https://www.legislation.gov.uk/ukdsi/2015/9780111128350/contents">https://www.legislation.gov.uk/ukdsi/2015/9780111128350/contents</a></p>	<p>The proposed amendments would strengthen the domestic minimum standard regulations by removing the existing 'no cost to the landlord' principle and introducing a 'landlord funding contribution' component where a landlord is unable to</p>	<p>To ensure that the domestic minimum standard regulations deliver the range of benefits originally envisaged from them.</p>	<p>The Local Plan and SA will need to consider whether these have any implications for new development.</p>

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	<p>obtain suitable 'no cost' funding. To protect landlords from excessive costs, Government is intending to introduce a cost cap: a limit on the amount any landlord would need to invest in an individual property. A cost cap of £2,500 per property is proposed.</p>		
<p>The Clean Growth Strategy (2017)  <a href="https://www.gov.uk/government/publications/clean-growth-strategy">https://www.gov.uk/government/publications/clean-growth-strategy</a></p>	<p>This strategy sets out the government's proposals for decarbonising all sectors of the UK economy through the 2020s. It explains how the whole country can benefit from low carbon opportunities, while meeting national and international commitments to tackle climate change</p>	<p>The Strategy aims to meet the UK domestic commitments at the lowest possible net cost to taxpayers, consumers and businesses; and, to maximise the social and economic benefits from this transition.</p> <p>Achieving clean growth, while ensuring an affordable energy supply for businesses and consumers, is at the heart of the UK's overall Industrial Strategy.</p>	<p>The Local Plan and SA will need to consider how to nurture low carbon technologies, processes and systems that are as cheap as possible at the local level.</p>
<p>Industrial Strategy: building a Britain fit for the future (2017)</p>	<p>This Strategy seeks to boost productivity by backing businesses to</p>	<p>The Strategy has Five Foundations:</p>	<p>The Local Plan and SA will need to carefully consider the Five Foundations at the local</p>

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<a href="https://www.gov.uk/government/publications/industrial-strategy-building-a-britain-fit-for-the-future">https://www.gov.uk/government/publications/industrial-strategy-building-a-britain-fit-for-the-future</a>	<p>create good jobs and increase the earning power of people throughout the UK with investment in skills, industries and infrastructure.</p>	<ul style="list-style-type: none"> <li>• be a more innovative economy;</li> <li>• good jobs and greater earning power for all;</li> <li>• upgrade infrastructure;</li> <li>• make better for business to start and grow; and</li> <li>• more prosperous communities.</li> </ul>	<p>level for the spatial strategy and policies on the economy.</p>
<p>The Road to Zero: Next steps towards cleaner road transport and delivering our industrial strategy (2018)</p> <a href="https://www.gov.uk/government/publications/reducing-emissions-from-road-transport-road-to-zero-strategy">https://www.gov.uk/government/publications/reducing-emissions-from-road-transport-road-to-zero-strategy</a>	<p>The Strategy seeks to put the UK at the forefront of the design and manufacturing of zero emission vehicles, and for all new cars and vans to be effectively zero emission by 2040.</p>	<p>The key aim of this Strategy is:</p> <ul style="list-style-type: none"> <li>• By 2040 to have the majority of new cars and vans sold to be 100% zero emission and all new cars and vans to have significant zero emission capability; and</li> <li>• By 2050 to have almost every car and van to be zero emission.</li> </ul>	<p>The Local Plan and SA will need to consider how to encourage the use of zero or ultra-low emissions private, goods and passenger carrying vehicles as well as how to help deliver suitable infrastructure to support vehicles that use alternative fuels i.e. EV charging network.</p>
<p>Air quality plan for nitrogen dioxide (NO<sub>2</sub>) in UK (2017)</p> <a href="https://www.gov.uk/government/publications/air-quality-plan-for-nitrogen-dioxide-no2-in-uk-2017">https://www.gov.uk/government/publications/air-quality-plan-for-nitrogen-dioxide-no2-in-uk-2017</a>	<p>Statutory air quality plan for nitrogen dioxide (NO<sub>2</sub>), setting out how the UK will be reducing roadside nitrogen dioxide concentrations.</p>	<p>For conventional car and van sales to end by 2040, and for almost every car and van on the road to be a zero emission vehicle by 2050.</p> <p>To tackle the causes of air pollution, local authorities should consider a wide range</p>	<p>The Local Plan and SA will need to consider a wide range of measures such as: changing road layouts at congestion and air pollution pinch points; encouraging public and private uptake of ULEVs; using innovative retrofitting technologies and new fuels;</p>

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		of innovative options, exploring new technologies and seeking to support the government's industrial strategy so that they can deliver reduced emissions in a way that best meets the needs of their communities and local businesses.	and, encouraging the use of public transport.
<p>Natural Capital Committee (Defra): Advice on using nature based interventions to reach net zero greenhouse gas emissions by 2050 (April 2020)</p> <p><a href="https://www.gov.uk/government/publications/a-natural-capital-approach-to-attaining-net-zero-nature-based-interventions">https://www.gov.uk/government/publications/a-natural-capital-approach-to-attaining-net-zero-nature-based-interventions</a></p>	<p>This paper sets out the NCC's advice to government on taking a natural capital approach to attaining net zero. Nature based interventions for attaining the government's net zero target should be viewed in the broader context of the 25 Year Environment Plan goals. This should be delivered through a joined-up government response to climate change.</p>	<p>To use nature based interventions to reach net zero greenhouse gas (GHG) emissions by 2050.</p>	<p>The Local Plan and SA will need to consider how nature based methods to reduce emissions can be incorporated into policies and the spatial strategy.</p>
<p>Carbon storage by habitat: Review of the evidence of the impacts of management decisions and condition of carbon stores and</p>	<p>This is a research report by Natural England looking into how terrestrial and marine managers can</p>	<p>The aims of this cross-cutting evidence project were:</p>	<p>The Local Plan will need to take into account the findings of this report in relation to how policies to tackle climate</p>

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
<p>sources. Natural England Research Report NERR043 (2012)</p> <p><a href="http://publications.naturalengland.org.uk/publication/1412347">http://publications.naturalengland.org.uk/publication/1412347</a></p>	<p>mitigate climate change by adopting practices that promote carbon storage and reduce emissions while enhancing the biodiversity value of ecosystems.</p>	<p>To collate information and identify knowledge gaps on carbon stocks (both in vegetation and soil) for important terrestrial, coastal and marine habitats in England.</p> <p>To determine how different management options may impact on sequestration or loss of carbon by habitat.</p>	<p>change are developed, particularly nature based solutions.</p>
<p>(Defra) Preparing for Climate Change: Good Practice Guide for Local Government (2019)</p> <p><a href="https://www.adeptnet.org.uk/system/files/documents/Good%20Practice%20Guide%20ADEPT%202019f.pdf">https://www.adeptnet.org.uk/system/files/documents/Good%20Practice%20Guide%20ADEPT%202019f.pdf</a></p>	<p>This guide seeks to assist local government with preparing for the impacts of climate change, a process known as change adaptation.</p>	<p>The overall aim of this guide is to reduce the impacts on service demand and delivery, and reduce financial costs, to meet other statutory requirements and delivering other co-benefits.</p>	<p>The Local Plan and SA will need to ensure that projects, plans and processes are resilient to climate change and help the authority achieve a wide range of other plans and ambitions.</p>
<p>UK Air Information Resource (UK-AIR)</p> <p><a href="https://uk-air.defra.gov.uk/">https://uk-air.defra.gov.uk/</a></p>	<p>Contains information on historic and current air quality across the UK, including a portal of Defra's national assessment against relevant Limit Values and air quality management areas.</p>	<p>No objectives, key targets or indicators. Information resource.</p>	<p>Consider air quality impacts of development and policies to address this.</p>

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<p>National Atmospheric Emissions Inventory</p> <p><a href="https://naei.beis.gov.uk/">https://naei.beis.gov.uk/</a></p>	<p>Information resource for emissions of air pollution including maps at a 1km by 1km resolution for a wide range of pollutants.</p>	<p>No objectives, key targets or indicators. Information resource.</p>	<p>Potentially use to identify pollutants.</p>
<p>Historic England's 'Sustainability Appraisal and Strategic Environmental Assessment' Advice Note (2016)</p> <p><a href="https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/">https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/</a></p>	<p>Sets out its expectations for the consideration and appraisal of effects on the historic environment as part of the Sustainability Appraisal/Strategic Environmental Assessment process.</p> <p>This updated guidance builds on previous versions of the document published in 2010 and 2013.</p> <p>Historic England are currently reviewing their advice in light of the changes to the National Planning Policy Framework, and will amend it, where necessary, in due course.</p>	<p>This Historic England Advice Note seeks to provide advice on historic environment considerations as part of the Sustainability Appraisal/Strategic Environmental Assessment process. It is aimed at all relevant local planning authorities, neighbourhood groups, developers, consultants, landowners and other interested parties.</p>	<p>The SA will need to take this Advice note, and any amendment, into account as part of the appraisal of policies, strategies, sites, options and alternatives for the Local Plan.</p>

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
<p>The Heritage Statement (2017)</p> <p><a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/664657/Heritage_Statement_2017_final_-_web_version.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/664657/Heritage_Statement_2017_final_-_web_version.pdf</a></p>	<p>Sets out how the Government will support the heritage sector to protect and care for the historic environment, in order to maximise its economic and social impact and to ensure that everyone can enjoy and benefit from it.</p>	<p>To support the heritage sector to protect and care for the historic environment, in order to maximise its economic and social impact.</p>	<p>The Local Plan and SA process will need to take into account the provisions of the statement in regards to any historic environment policies.</p>
<p>The Government's Statement on the Historic Environment for England 2010</p> <p><a href="https://www.gov.uk/government/publications/the-governments-statement-on-the-historic-environment-for-england">https://www.gov.uk/government/publications/the-governments-statement-on-the-historic-environment-for-england</a></p>	<p>This document is intended to help the Government realise its vision for the historic environment, and to assist them in working jointly with others to achieve their aims. In the document, the Government sets out its understanding of the value of the historic environment, and the many roles that the Government and others can play. It considers the key opportunities for future involvement and</p>	<p>The Vision is:</p> <p>That the value of the historic environment is recognised by all who have the power to shape it; that Government gives it proper recognition and that it is managed intelligently and in a way that fully realises its contribution to the economic, social and cultural life of the nation.</p> <p>The analysis of the challenges and opportunities has led the government to identify six broad strategic aims that we should strive to meet:</p> <ol style="list-style-type: none"> <li>1. Strategic Leadership;</li> </ol>	<p>The Local Plan and SA process will need to take into account the provisions of the statement in regards to any historic environment policies.</p>



Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
	the challenges it must address.	<ol style="list-style-type: none"> <li>2. Protective Framework;</li> <li>3. Local Capacity;</li> <li>4. Public Involvement;</li> <li>5. Direct Ownership; and</li> <li>6. Sustainable Future</li> </ol>	
<p>Public Health England Strategy 2020-2025</p> <p><a href="https://www.gov.uk/government/publications/phe-strategy-2020-to-2025">https://www.gov.uk/government/publications/phe-strategy-2020-to-2025</a></p>	<p>Sets out how Public Health England (PHE) will work to protect and improve the public's health and reduce health inequalities over the next 5 years. It outlines PHE's role within the public health system, 10 priorities where PHE will focus particular effort and the areas where PHE will build capability within the organisation to support delivery of its strategic objectives and wider activities.</p>	<p>The aims are:</p> <ul style="list-style-type: none"> <li>• To keep people safe;</li> <li>• To work to prevent poor health;</li> <li>• To work to narrow the health gap; and</li> <li>• To support a strong economy.</li> </ul> <p>The 10 Priorities are:</p> <ol style="list-style-type: none"> <li>1. A smoke-free society;</li> <li>2. Healthier diets, healthier weight;</li> <li>3. Cleaner air;</li> <li>4. Better mental health;</li> <li>5. Best start in life;</li> <li>6. Effective responses to major incidents;</li> <li>7. Reduced risk from antimicrobial resistance;</li> <li>8. Predictive prevention;</li> </ol>	<p>The local Plan and SA will need to take the aims and priorities of this Strategy into consideration.</p>

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
		9. Enhanced data and surveillance capabilities; and 10. New national science campus.	
Public Health England – Healthy Towns  <a href="https://www.gov.uk/government/publications/phe-healthy-places/healthy-places">https://www.gov.uk/government/publications/phe-healthy-places/healthy-places</a>	The Healthy Places programme was set up in 2013 by Public Health England (PHE) in recognition that where we live and the homes we live in have a big impact on our health and wellbeing. The programme works in partnership with local and national partners on a wide range of activities and is a hub for PHE’s activities on ‘place’. The programme’s achievements to date are summarised below	The programme has been designed to support the development of healthy places and homes with the aim of ensuring that health inequalities are considered and addressed when planning, developing and improving the built environment and in enabling people to have a place they can call ‘home’	The local Plan and SA will need to take the aims and priorities of this Strategy into consideration.
Public Health England – Spatial Planning For Health – Evidence Review (July 2017)	This report provides the findings from an evidence review examining the links between health, and the built and natural	N/A	Take on board the evidence review findings.

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<a href="https://www.gov.uk/government/publications/spatial-planning-for-health-evidence-review">https://www.gov.uk/government/publications/spatial-planning-for-health-evidence-review</a>	<p>environment to help inform policy and support local action. It provides public health planners and local communities with evidence informed principles for designing healthy places</p>		
<p>The Marmot Review – Fair Society, Healthy Lives (February 2010)</p> <p><a href="https://www.local.gov.uk/marmot-review-report-fair-society-healthy-lives#:~:text=The%20Marmot%20Review%20into%20health,can%20lead%20to%20health%20inequalities.">https://www.local.gov.uk/marmot-review-report-fair-society-healthy-lives#:~:text=The%20Marmot%20Review%20into%20health,can%20lead%20to%20health%20inequalities.</a></p>	<p>The report, titled 'Fair Society, Healthy Lives', proposes a new way to reduce health inequalities in England post-2010. It argues that, traditionally, government policies have focused resources only on some segments of society. To improve health for all of us and to reduce unfair and unjust inequalities in health, action is needed across the social gradient</p>	<p>The Marmot Review looks at the differences in health and well-being between social groups and describes how the social gradient on health inequalities is reflected in the social gradient on educational attainment, employment, income, quality of neighbourhood and so on. In addressing health inequalities the Review asserts that it is not sufficient just to focus on the bottom 10 per cent because there are poorer outcomes all the way down from the top. Universal action is needed to reduce the steepness of the social gradient of health inequalities, but with a scale and intensity that is</p>	<p>Need to incorporate the findings of the review to the Local Plan and SA process.</p>

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
		proportionate to the level of disadvantage.	
<p>HM Government A connected society: a strategy for tackling loneliness (October 2018)</p> <p><a href="https://www.gov.uk/government/publications/a-connected-society-a-strategy-for-tackling-loneliness">https://www.gov.uk/government/publications/a-connected-society-a-strategy-for-tackling-loneliness</a></p>	<p>This strategy sets out the approach to tackling loneliness in England. It marks a shift in the way we see and act on loneliness, both within government and in society more broadly</p>	<p>This strategy is an important first step; government is also committed to long-lasting action to tackle the problem of loneliness</p>	<p>The Local Plan and SA process need to fully consider the strategy recommendations/findings.</p>
<p>Future of mobility: urban strategy' (2019)</p> <p><a href="https://www.gov.uk/government/publications/future-of-mobility-urban-strategy">https://www.gov.uk/government/publications/future-of-mobility-urban-strategy</a></p>	<p>This Strategy outlines the government's approach to maximising the benefits from transport innovation in cities and towns. It sets out the principles that will guide government's response to emerging transport technologies and business models.</p>	<p>Through a clear and collaborative approach to emerging transport technologies and services, the UK can enable innovation to flourish and harness this once-in-a-century opportunity to transform mobility for the better.</p>	<p>The Local Plan and SA will need to take the aims and objectives of this Strategy into consideration when looking at options for sustainable transport and reducing the reliance of private cars.</p>
<p>Inclusive Transport Strategy (2018)</p> <p><a href="https://www.gov.uk/government/publications/inclusive-transport-strategy">https://www.gov.uk/government/publications/inclusive-transport-strategy</a></p>	<p>This is the Department for Transport's (DfT's) strategy to create an inclusive transport system for disabled travellers.</p>	<p>The Strategy sets out:</p> <ul style="list-style-type: none"> <li>• government's actions for achieving equal access to transport for disabled people;</li> </ul>	<p>The Local Plan and SA will need to take the aims and objectives of this Strategy into consideration when looking at options for sustainable transport and reducing the reliance of private cars.</p>

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
		<ul style="list-style-type: none"> <li>• a clear programme of monitoring and evaluation; and</li> <li>• a new governance framework for accountability.</li> </ul>	
<p>Transport Investment Strategy (2017)</p> <p><a href="https://www.gov.uk/government/publications/transport-investment-strategy">https://www.gov.uk/government/publications/transport-investment-strategy</a></p>	<p>This strategy sets out the Department for Transport's priorities and approach for future transport investment decisions and explains how transport investment can deliver a stronger, fairer Britain.</p>	<p>The Strategy describes what the government are trying to achieve through:</p> <ul style="list-style-type: none"> <li>• their investment in transport infrastructure;</li> <li>• the priorities and propositions that will guide future investment decisions;</li> <li>• the institutional frameworks within which those decisions will be taken; and</li> <li>• the actions we are taking to help us meet our ambitions.</li> </ul> <p>The document includes a commitment to consult on a new 'Major Road Network'. This would see a share of the</p>	<p>The Local Plan and SA will need to take the aims and objectives of this Strategy into consideration when looking at options for sustainable transport and the transport network in general in the district.</p>

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
		annual National Road Fund, funded by Vehicle Excise Duty (VED), given to local authorities to improve or replace the most important A-roads under their management. It also outlines plans for a new 'rebalancing' measure, which will judge how investment programmes contribute to a more balanced economy.	
<b>Level: Local</b>			
<p>WDC Climate Emergency Plan (2019)</p> <p><a href="http://council.wealden.gov.uk/documents/s64850/Appendix%20B%20-Wealden%20District%20Council-Climate%20Emergency%20Plan-FINAL.pdf">http://council.wealden.gov.uk/documents/s64850/Appendix%20B%20-Wealden%20District%20Council-Climate%20Emergency%20Plan-FINAL.pdf</a></p>	<p>On July 24th 2019, Wealden District Council (WDC) unanimously approved a motion to declare a Climate Emergency and committed to becoming carbon neutral by 2050.</p> <p>As part of this commitment, the Council resolved to develop an evidence-based Climate Emergency Plan that would identify the key</p>	<p>Key actions identified as part of the Plan are:</p> <ul style="list-style-type: none"> <li>• Grid decarbonisation;</li> <li>• Energy demand reduction;</li> <li>• Low carbon heating systems;</li> <li>• Building integrated renewable energy generation and storage;</li> <li>• Low carbon transport; and</li> <li>• Offsetting.</li> </ul>	<p>The Local Plan and SA will need to ensure that the spatial strategy and policies align with the aims and objectives of the Climate Emergency Plan/Action Plan.</p>

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
	actions and intervention measures required to meet the net zero target, describing the scale of impact along with a discussion of practicalities and resource implications.		
<p>Wealden District Council Corporate Plan 2019 – 2023</p> <p><a href="https://www.wealden.gov.uk/wealdens-policies-and-plans/corporate-plan-2019-23/">https://www.wealden.gov.uk/wealdens-policies-and-plans/corporate-plan-2019-23/</a></p>	<p>The Council's Corporate Plan sets out its direction and priorities for the next four years.</p>	<p>The Plan aims to:</p> <ul style="list-style-type: none"> <li>• Protect and enhance Wealden's high quality natural environment and heritage;</li> <li>• Promote a better quality of life for Wealden people through activities that improve health, resilience and well-being;</li> <li>• Improve access to essential services for all our communities;</li> <li>• Ensure development meets future needs, with associated investment in infrastructure;</li> <li>• Take advantage of opportunities to promote new, cleaner technologies;</li> <li>• Work with partners to regenerate our diverse</li> </ul>	<p>The Corporate Plan is the plan for the Council as a whole and so the Local Plan and SA process needs to ensure this is accounted for in the spatial strategy and policies so as to avoid any potential conflict.</p>

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
		<p>market towns, creating jobs and attracting investment;</p> <ul style="list-style-type: none"> <li>• Support our local businesses and entrepreneurs to achieve a locally sustainable economy; and</li> <li>• Generate ongoing sources of income to reinvest in local priorities and optimise funding from external sources.</li> </ul>	
<p>South2East Local Energy Strategy (2018)</p> <p><a href="https://www.southeastlep.com/energysouth2east/">https://www.southeastlep.com/energysouth2east/</a></p>	<p>Three LEPs – SELEP, Coast to Capital and Enterprise M3 – have worked together to create an Energy Strategy for the South East, an area spanning all the way from Harwich to Winchester. The Energy Strategy recognises the aspirations of the Department for Business, Energy &amp; Industrial Strategy (BEIS) delivering solutions that will take the UK on a journey to providing local energy provision shifting</p>	<p>Setting down a clear vision for energy provision:</p> <ul style="list-style-type: none"> <li>• it provides a clear analysis of the energy opportunities and challenges across the Tri-LEP area, for power, heat and transport;</li> <li>• it responds to national trajectory of decarbonisation and clean growth;</li> <li>• it estimates the demand on energy and carbon emissions over time;</li> <li>• it considers energy and low carbon priorities for the South East;</li> </ul>	<p>The Local Plan and SA will need to ensure the strategy is taken account of as part of any energy related polices.</p>



Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
	the country to a low carbon economy.	<ul style="list-style-type: none"> <li>• it considers future funding options to deliver low carbon energy projects; and</li> <li>• it presents conclusions and recommendations to central government.</li> </ul> <p>Its aims are to:</p> <ul style="list-style-type: none"> <li>• Enable the region to decarbonise in line with the national trajectory;</li> <li>• To make the region a centre for innovation in the low carbon sector;</li> <li>• Foster clean growth across the region;</li> <li>• Ensure that all energy across the region is clean and low-carbon; and</li> <li>• Ensure that local people and society are beneficiaries.</li> </ul>	
<p>BEIS, Sub-national total final energy consumption statistics: 2005-2017 (published 2019)</p> <p><a href="https://www.gov.uk/government/statistical-data-sets/total-final-energy-">https://www.gov.uk/government/statistical-data-sets/total-final-energy-</a></p>	<p>These statistics provide estimates of total final energy consumption from 2003 to 2017 at a regional and a local level.</p>	<p>The overall aim is to decrease energy usage and encourage reusable and low emission energy sources.</p>	<p>The Local Plan and SA process will need to seek to promote alternative zero or low emission energy usage through policies and the spatial strategy.</p>

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
<a href="#">consumption-at-regional-and-local-authority-level</a>			
<p>BEIS, Emissions of carbon dioxide for Local Authority areas: 2005-2017 (published 2019)</p> <p><a href="https://data.gov.uk/dataset/723c243d-2f1a-4d27-8b61-cdb93e5b10ff/emissions-of-carbon-dioxide-for-local-authority-areas">https://data.gov.uk/dataset/723c243d-2f1a-4d27-8b61-cdb93e5b10ff/emissions-of-carbon-dioxide-for-local-authority-areas</a></p>	<p>This provides a breakdown of carbon dioxide emissions by Local Authority area as a subset of the annual inventory of greenhouse gas emissions.</p>	<p>The overall aim is to reduce CO2 emissions per capita.</p>	<p>The Local Plan and SA process will need to consider CO2 emissions and ways to reduce existing levels through policies and the spatial strategy.</p>
<p>National Grid Future Energy Scenarios (2019)</p> <p><a href="http://fes.nationalgrid.com/fes-document/">http://fes.nationalgrid.com/fes-document/</a></p>	<p>The National Grid's FES outline a set of pathways that capture what the future of energy may be and navigate what the potential future for the energy industry may be. The Future Energy Scenarios outline four different credible pathways for the future of energy for the next 30 years and beyond. Each scenario considers how much energy the UK might need and where it could come from.</p>	<p>The delivery of low cost energy for the consumer of the future and for meeting the energy industry's contribution to carbon reduction targets.</p>	<p>The Local Plan and SA will need to consider changes in the way energy is provided and seek to encourage zero and low emission developments through policies and the spatial strategy. The FES provide a very good information resource of how this is being approached nationally.</p>

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
<p>East Sussex Joint Waste Management Strategy</p> <p><a href="https://www.eastsussex.gov.uk/environment/rubbishandrecycling/managingwaste/wastestrategy/">https://www.eastsussex.gov.uk/environment/rubbishandrecycling/managingwaste/wastestrategy/</a></p>	<p>ESCC have prepared a joint waste strategy in partnership with the East Sussex borough and district councils: Eastbourne, Hastings, Lewes, Rother and Wealden. The strategy sets out how ESCC plan to manage waste from 2014 to 2025.</p>	<p>The Strategy aims to:</p> <ul style="list-style-type: none"> <li>• Reduce the amount of waste produced;</li> <li>• Increase the amount of waste reused, recycled and composted;</li> <li>• Reduce the amount of waste landfilled;</li> <li>• Recover more value from our waste;</li> <li>• Provide waste services that offer value for money, i.e. that are good and affordable, and are accessible to everyone;</li> <li>• Review and continuously improve our waste services to ensure they remain environmentally sustainable and affordable; and</li> <li>• Manage waste as close as possible to its source, ideally within the County.</li> </ul> <p>By 2020 ESCC will:</p> <ul style="list-style-type: none"> <li>• Work to limit the total amount of household waste produced</li> </ul>	<p>The Local Plan and SA will need to take this Strategy into account in terms of waste policies.</p>

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
		<p>to 995 kg per household per year;</p> <ul style="list-style-type: none"> <li>• Recycle and compost 50% of the household waste we produce;</li> <li>• Reuse 15% of the household waste we produce;</li> <li>• Recover energy from at least 95% of the household waste that isn't reused, recycled or composted; and</li> <li>• Divert at least 95% of household waste from landfill;</li> </ul> <p>By 2025 ESCC will:</p> <ul style="list-style-type: none"> <li>• Recycle and compost 60% of the household waste produced.</li> </ul>	
<p>Waste and Minerals Local Plan for East Sussex (2013) and the East Sussex, South Downs and Brighton and Hove Waste and Minerals Sites Plan (2017).</p> <p><a href="https://www.eastsussex.gov.uk/environment/planning/mineralsandwaste/">https://www.eastsussex.gov.uk/environment/planning/mineralsandwaste/</a></p>	<p>The East Sussex Waste and Minerals Plan (2013) sets out the strategic policies for waste and minerals in the Plan Area. This Plan forms part of the 'Development Plan' covering East Sussex, the South Downs and</p>	<p>Contains several sites allocated as waste facility sites in the district.</p>	<p>The Local Plan and SA will need to take into account the sites that are allocated in the accompanying Waste and Minerals Sites Plan (2017).</p>

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
	Brighton & Hove. The East Sussex, South Downs and Brighton & Hove Waste and Minerals Sites Plan was adopted 2017. It highlights industrial sites in which waste related development will be supported.		
<p>Environment Strategy for East Sussex 2020</p> <p><a href="https://www.eastsussex.gov.uk/environment/priorities/environmentstrategy/">https://www.eastsussex.gov.uk/environment/priorities/environmentstrategy/</a></p>	<p>The purpose of the Strategy is to set out the transformational change that is required and why, and what new steps are going to be taken to help address the urgent environmental challenges and to maximise the available opportunities.</p>	<p>The overall aim is to:</p> <p>“Protect and enhance our natural and built environment for current and future generations and tackle and adapt to climate change”.</p> <p>Five priority environmental themes have been identified aligning with international and national policy, these are: climate change, natural capital, air quality, water and resource efficiency.</p> <p>In relation to air quality the key action identified is to develop a Local Cycling and Walking</p>	<p>The Local Plan and SA will need to ensure that the spatial strategy and any policies take account of the requirements and aims and objectives of the Environment Strategy.</p>

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
		Infrastructure Plan which is carried forward in the ESCC Local Transport Plan (2011-2026).	
<p>The Sussex Local Nature Partnership</p> <p><a href="http://sussexlnp.org.uk/">http://sussexlnp.org.uk/</a></p>	<p>The purpose of the Sussex Local Nature Partnership is to work across sectors and organizations to secure the healthiest ecological system possible, thereby protecting and enhancing the natural environment.</p>	<p>The Sussex Local Nature Partnerships published their Natural Capital Investment Strategy for Sussex in December 2019. The strategy seeks to guide their approach to directing investment in nature, across the terrestrial, coastal and marine environments, for the next 5 year period and beyond. The Strategy provides an initial strategic assessment of how best to focus effort, resources and funds to protect and enhance the stock of natural capital assets for the benefit of nature and people. It also identifies opportunities to use a natural capital approach to deliver specific outputs as well as guidance on the steps needed to take this broad spatial strategy forward into</p>	<p>Make sure that natural capital is a central theme of the Local Plan and SA process, including policies.</p>

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
		action and outcomes on the ground.	
<p>East Sussex County Council Local Transport Plan (2011-2026)</p> <p><a href="https://www.eastsussex.gov.uk/road-andtransport/localtransportplan/ltpl3/downloadltpl3/">https://www.eastsussex.gov.uk/road-andtransport/localtransportplan/ltpl3/downloadltpl3/</a></p>	<p>Sets out the County's direction for planning and providing the transport infrastructure and services that are needed to deliver sustainable economic growth and support additional housing in the county during this period. The vision for the plan includes delivering a high quality environment.</p>	<p>The vision for the plan includes delivering a high quality environment. It recognises that most of the air pollution in the county is generated by road traffic and includes measures that focus on reducing emissions. This includes reducing the need to travel; the promotion of different modes of transport; and supporting local authorities to carry out air quality reviews and the preparation of air quality action plans. Key action is the development of an East Sussex Local Cycling &amp; Walking Infrastructure Plan.</p>	<p>Need to ensure county level considerations are accounted for in the Local Plan.</p> <p>Policies need to seek to reduce the need to travel and facilitate a modal shift.</p>
<p>Transport Strategy for the South East (2019)</p> <p><a href="https://transportforthesoutheast.org.uk/transport-strategy/">https://transportforthesoutheast.org.uk/transport-strategy/</a></p>	<p>The Strategy was consulted on between 7 October 2019 and 10 January 2020. The final strategy will be published in Summer 2020 with a strategic investment plan to follow.</p>	<p>The vision is:</p> <p>By 2050 the South East will be the world's leading region for sustainable economic growth.</p> <p>The mission is to provide a clean, safe, seamless transport</p>	<p>The Local Plan and SA will need to ensure the Strategy is taken into account for policy development.</p>

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
		<p>system to better connect our lives and our businesses while protecting the environment. That will mean more jobs, more opportunities to trade in the global marketplace and a better quality of life for everyone.</p> <p>The aims are:</p> <ul style="list-style-type: none"> <li>• Better connectivity</li> <li>• More reliable journeys</li> <li>• A more resilient transport network</li> <li>• A new collaborative approach</li> <li>• A 'smart' transport network</li> <li>• Promotion of active travel and active lifestyles</li> <li>• Improved air quality</li> <li>• Affordable and accessible travel</li> <li>• A seamlessly integrated network</li> <li>• A safely planned, operated and delivered network</li> </ul>	



Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
		<ul style="list-style-type: none"> <li>• Cutting the South East carbon emissions to net zero by 2050</li> <li>• Reduce the impact of transport</li> <li>• A transport network that protects and enhances the natural, built and historic environment.</li> </ul>	
<p>East Sussex Health and Social Care Plan (April 2020)</p> <p><a href="https://democracy.eastsussex.gov.uk/issueDetails.aspx?IId=18799&amp;PlanId=0&amp;Opt=3#AI17307">https://democracy.eastsussex.gov.uk/issueDetails.aspx?IId=18799&amp;PlanId=0&amp;Opt=3#AI17307</a></p>	<p>The plan has been produced by the East Sussex Clinical Commissioning Groups, East Sussex County Council (ESCC), East Sussex Healthcare NHS Trust (ESHT), Sussex Community NHS Foundation Trust (SCFT), and Sussex Partnership NHS Foundation Trust (SPFT). It is a partnership of organisations working together to deliver health and social care in East Sussex.</p>	<p>The key aims of the Plan and partnership are to:</p> <ul style="list-style-type: none"> <li>• Break down barriers between health and social care;</li> <li>• Improve the health and wellbeing of local people; and</li> <li>• Reduce health inequalities</li> </ul>	<p>The Local Plan should work to incorporate the aims of the Plan into its policies on health and wellbeing in particular.</p>
<p>The Sussex Air Quality Partnership (Sussex-Air)</p>	<p>Aims to drive improvements in air</p>	<p>The partnership is made up of representatives from local</p>	<p>The Business Plan 2019/2020 seeks to deliver a work</p>

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
<a href="http://www.sussex-air.net/">http://www.sussex-air.net/</a>	<p>quality (and carbon reduction) in Sussex. The aim of the partnership is to assist partners to comply with their statutory Local Air Quality Management (LAQM) duties and contribute to improving air quality and health in Sussex</p>	<p>authorities in East and West Sussex, the Sussex Health Protection Agency, Sussex Primary Care Trusts, the Environment Agency, the University of Sussex and the University of Brighton. The aim of the partnership is to assist partners to comply with their statutory Local Air Quality Management (LAQM) duties and contribute to improving air quality and health in Sussex.</p>	<p>programme to: improve the local air quality evidence base; improve information and advice to the public; outline DEFRA grant projects; and coordinate partnership communications. Will need to consider this in the Local Plan.</p>
<p>Annual Report of the Director of Public Health in East Sussex (2019/20) – Health and Housing: You cannot maintain good health without good housing</p> <p><a href="http://passthrough.fw-notify.net/download/348183/http://www.eastsussexjsna.org.uk/JsnaSiteAspx/media/jsna-media/documents/publichealthreports/2019_20/DPH-report-2019_20_lowerWithLogos.pdf">http://passthrough.fw-notify.net/download/348183/http://www.eastsussexjsna.org.uk/JsnaSiteAspx/media/jsna-media/documents/publichealthreports/2019_20/DPH-report-2019_20_lowerWithLogos.pdf</a></p>	<p>This report sets out the strategic recommendations to address health and the housing crisis in East Sussex</p>	<p>The three strategic recommendations are:</p> <ul style="list-style-type: none"> <li>• To make all housing and neighbourhoods healthy;</li> <li>• To make all homes healthy; and</li> <li>• To make people healthier in their homes</li> </ul>	<p>The Local Plan and SA will need to consider health impacts of housing and development design</p>
<p>Wealden District Needs and Assets Profile (2017)</p>	<p>The profile identifies needs (which may also be</p>	<p>This profile forms part of the East Sussex Joint Strategic</p>	<p>The Local Plan and SA should use data referred to in this</p>

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
<a href="http://www.eastsussexjsna.org.uk/JsnaSiteAspx/media/jsna-media/documents/overviews/2017%20LNAP/LNP-Wealden-District-2017.pdf">http://www.eastsussexjsna.org.uk/JsnaSiteAspx/media/jsna-media/documents/overviews/2017%20LNAP/LNP-Wealden-District-2017.pdf</a>	<p>referred to or seen as deficits) as well as assets (which may also be referred to or seen as strengths) from key indicators that have been benchmarked against the England average.</p>	<p>Needs and Assets Assessment (JSNAA) and draws together data and analysis from East Sussex public health reports and various health profiles produced by Public Health England. It brings together existing data and analysis, from a variety of sources, at CCG, district/borough council and East Sussex levels</p>	<p>profile or the most up to date version of any data.</p>
<p>Wealden District Area Summary (2018)</p> <a href="http://www.eastsussexjsna.org.uk/JsnaSiteAspx/media/jsna-media/documents/scorecards/2018/Area%20Summaries/LA%20View/LA-Area-Summary---Wealden-2018.pdf">http://www.eastsussexjsna.org.uk/JsnaSiteAspx/media/jsna-media/documents/scorecards/2018/Area%20Summaries/LA%20View/LA-Area-Summary---Wealden-2018.pdf</a>	<p>This summary describes Wealden District in the East Sussex context. It is based on 2018 JSNAA scorecard data, presented in the form of indicator tables (Appendix 1) in which East Sussex districts and boroughs are RAG-rated against East Sussex. Further tables and charts summarise key statistics and specific topics (such as hospital admission and attendance rates) for this district.</p>	<p>None – this is an information summary</p>	<p>The Local Plan and SA should use data referred to in this summary or the most up to date version of any data.</p>

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
<p>Wealden District Council Climate Change Action Plan</p> <p><a href="http://www.wealdendistrict.com/Climate_Change/Pictures_Climate_Change/WDC_Climate_Change_Action_Plan_Wealden_District_Council.pdf">http://www.wealdendistrict.com/Climate_Change/Pictures_Climate_Change/WDC_Climate_Change_Action_Plan_Wealden_District_Council.pdf</a></p>	<p>Outlines the ways in which Wealden District Council will try to limit the effects of climate change by lowering its own carbon dioxide emissions.</p>	<p>To deliver at a local level the UK climate change programme by assessing the carbon footprint of the district and then evaluate measures to reduce it and achieve a significant reduction of emissions from all sectors influenced by Wealden policies. Work with key providers to assess the potential impacts of climate change and to identify ways to adapt.</p>	<p>The Local Plan and SA will need to focus on ways of reducing the carbon footprint of the District through policies and the spatial strategy.</p>
<p>High Weald AONB Management Plan 2019-2024</p> <p><a href="http://www.highweald.org/high-weald-aonb-management-plan.html">http://www.highweald.org/high-weald-aonb-management-plan.html</a></p>	<p>Is a locally run and accountable strategy, based on evidence, for looking after designated places in the interests of both people and nature. It is formulated to coordinate policy, investment and action in the nationally-important landscape.</p>	<p>Great support should be behind conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty, which have a high status of protection. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas. The Management Plan sets out a number of specific objectives to be achieved when considering the AONB and development.</p>	<p>The Management Plan has been developed with the input of the Council and will be fully considered through the Local Plan and SA process.</p>

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
<p>Adopted Core Strategy (February 2013)</p> <p><a href="https://www.wealden.gov.uk/planning-and-building-control/planning-policy/core-strategy-local-plan/">https://www.wealden.gov.uk/planning-and-building-control/planning-policy/core-strategy-local-plan/</a></p>	<p>Comprises a long-term spatial vision and strategic objectives for the Wealden District area for the period 2013 to 2027, this also includes the areas of the South Downs National Park that are within Wealden District.</p> <p>This Local Plan is considered to be outdated.</p>	<p>Promote sustainable growth to meet needs by balancing the ability of the environment and infrastructure to accommodate that growth. Aim to deliver 450 homes per annum over the plan period that ends in 2027.</p> <p>To retain Wealden’s rural character and high quality environment, whilst also providing sufficient growth to improve our economy, regenerate our market towns and villages.</p>	<p>The new Local Plan will replace this Core Strategy and will be based on up to date evidence. The policies underpinning the Core Strategy will be reviewed as part of the new Local Plan.</p>
<p>Affordable Housing Delivery Local Plan – 2016</p> <p><a href="https://www.wealden.gov.uk/planning-and-building-control/planning-policy/affordable-housing-delivery-local-plan/">https://www.wealden.gov.uk/planning-and-building-control/planning-policy/affordable-housing-delivery-local-plan/</a></p>	<p>To help meet affordable housing needs of the District from new developments, whilst ensuring the overall viability of the development is not compromised and that a mix of tenure is provided that meets the needs of local area.</p>	<p>To help meet affordable housing needs of the District from new developments, whilst ensuring the overall viability of the development is not compromised and that a mix of tenure is provided that meets the needs of local area.</p> <p>Under the Local Plan, affordable housing is required at a level of 35% of the number of dwellings on large development site, unless good</p>	<p>The new Local Plan will replace this Core Strategy and will be based on up to date evidence.</p>

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
		reason for a reduction is provided.	
<p>East Sussex Local Flood Risk Management Strategy 2016 – 2026</p> <p><a href="https://www.eastsussex.gov.uk/media/6955/flood-risk-strategy-2016-26-final-edition-ebook1-1.pdf">https://www.eastsussex.gov.uk/media/6955/flood-risk-strategy-2016-26-final-edition-ebook1-1.pdf</a></p>	<p>This document has been prepared as part of the County Council's role as a lead local flood authority. It is in line with the Environment Agency's National Strategy for Flood and Coastal Erosion Risk Management, and builds upon the first Local Flood Risk Management Strategy, which established principles of local flood risk and included an annually updated delivery plan.</p>	<p>The aims of the Strategy are:</p> <ul style="list-style-type: none"> <li>• To limit the impacts of local flooding across the county; and</li> <li>• To rectify drainage issues in the county.</li> </ul> <p>The long-term aim of the strategy is to provide a co-ordinated approach to managing local forms of flood risk in East Sussex. This is defined as flooding from surface water, groundwater and ordinary watercourses.</p>	<p>To consider the risk of flooding by determining the location of development, influencing its form and ensuring that the appropriate surface water drainage systems are used. Also to consider the risk which might be posed elsewhere.</p>
<p>Water, People, Places: A Guide for master planning sustainable drainage (2013)</p> <p><a href="https://eastsussexgovuk.blob.core.windows.net/media/1997/se7-suds-masterplanning_low_res_reduced.pdf">https://eastsussexgovuk.blob.core.w indows.net/media/1997/se7-suds-masterplanning_low_res_reduced.p df</a></p>	<p>This guidance outlines the process for integrating sustainable drainage systems (SuDS) into the master planning of large and small developments. Consideration of the movement of water and its interaction with space</p>	N/A	<p>The Local Plan and SA should consider the guidance given in this document for inclusion within specific SuDS policies.</p>

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
	<p>at the earliest stage of design is crucial to the success of SuDS and allows the developer to maximise wider benefits. This guidance complements existing guidance on SuDS design, maintenance and operation which should be used to inform detailed design and delivery of SuDS.</p> <p>The Flood and Water Management Act 2010 provides the legislative intention to require all new developments to incorporate SuDS.</p>		
<p>East Sussex Growth Strategy 2014-2020</p> <p><a href="https://www.eastsussex.gov.uk/media/1802/eastsussexgrowthstrategydec2014.pdf">https://www.eastsussex.gov.uk/media/1802/eastsussexgrowthstrategydec2014.pdf</a></p>	<p>The Growth Strategy sets out the LEP's vision for a more innovative, productive and faster growing East Sussex economy. The LEP believe the county has a unique offer to make to investors, businesses and</p>	<p>The Strategy is built around 3 pillars:</p> <ul style="list-style-type: none"> <li>• Business - Enabling business growth, particularly of 'high value' businesses;</li> <li>• Place - A significantly valued asset to the East Sussex economy; and</li> </ul>	<p>The Local Plan and SA will need to carefully consider the LEP's strategy when developing the spatial strategy and economic policies in order to promote sustainable economic growth.</p>

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
	<p>skilled workers; one that blends inspiring coastline and countryside and a business base of likeminded companies in growing sectors of the economy.</p>	<ul style="list-style-type: none"> <li>• People - Meeting the skills needs of business and supporting residents to reach their full potential.</li> </ul>	
<p>South East LEP Growth Deal and Economic Plan (2014)</p> <p><a href="https://www.southeastlep.com/app/uploads/Strategic_Economic_Plan_2014.pdf">https://www.southeastlep.com/app/uploads/Strategic_Economic_Plan_2014.pdf</a></p>	<p>Sets out the approach to the delivery of growth within 4 areas including the East Sussex Growth Deal.</p>	<p>Through the East Sussex Growth Deal, there is significant potential to unlock ambitious business and housing growth plans and to build on current investments in infrastructure. This includes the A22/A27 Eastbourne – South Wealden Growth Corridor. The main ask of government is the upgrading of the route between Eastbourne and Lewes to improve connectivity to the A23/M23, a potentially expanding Gatwick Airport, and London, supporting business and housing growth plans in the Eastbourne/South Wealden growth corridor.</p>	<p>The Local Plan and SA will need to consider the Growth Corridor as appropriate.</p>



Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
<p>South East LEP Local Industrial Strategy</p> <p><a href="https://www.southeastlep.com/our-strategy/local-industrial-strategy/">https://www.southeastlep.com/our-strategy/local-industrial-strategy/</a></p>	<p>In 2014, the LEP produced its first Strategic Economic Plan, underpinning a growth deal worth almost £600 million in investment, which supports nearly 200 projects. The investment aims to deliver 78,000 jobs and 29,000 homes by 2021. In 2018, following the publication of the National Industrial Strategy in 2017, Government mandated that every LEP should produce a Local Industrial Strategy (LIS).</p> <p>Whilst awaiting further detail and structure from Government, the South East LEP continued its commitment to provide a refresh of the Strategic Economic Plan and in late 2018, the LEP produced an Economic Strategy Statement – Smarter Faster Together. This</p>	<p>The LIS has two core aims: to increase productivity and realise potential and allow all communities to contribute to and benefit from economic prosperity.</p>	<p>The Local Plan will need to consider the LIS as appropriate.</p>

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
	document sets out the path towards developing our LIS.		
<p>South East LEP Strategic Economic Plan 2019</p> <p><a href="http://kmep.org.uk/documents/SELEP_StratEconState_v10-low.pdf">http://kmep.org.uk/documents/SELEP_StratEconState_v10-low.pdf</a></p>	<p>This document is the SELEP's prospectus for a more productive and more prosperous economy in which everyone has the opportunity to succeed. It outlines shared priorities and how the SELEP will work Smarter, Faster and Together to support long-term growth – both for the South East and for the whole of the UK.</p>	<p>In addition to the link with a future Local Industrial Strategy, this Strategy Statement is underpinned by four key principles:</p> <ul style="list-style-type: none"> <li>• Strategic focus;</li> <li>• Partnership;</li> <li>• Local leadership; and</li> <li>• Evidence-led and pragmatic.</li> </ul>	<p>The Local Plan will need to ensure the Economic Plan is fully considered in the development of the spatial strategy and policies.</p>
<p>Skills East Sussex – Statement of Prioritise and Activity Plan (2017-2020)</p> <p><a href="https://www.eastsussex.gov.uk/business/eastsussex/selep/ses/ses/">https://www.eastsussex.gov.uk/business/eastsussex/selep/ses/ses/</a></p>	<p>Skills East Sussex (SES) is the county's strategic body for employment and skills.</p>	<p>The group aims to drive an improvement in local employment and skills in order to increase economic prosperity in East Sussex. Using a firm evidence base, it agrees and sets priorities, and provides direction for the county's approach to employment and skills.</p>	<p>The Local Plan will need to ensure the aims of the Plan are fully considered in the development of the spatial strategy and policies.</p>

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
		<p>SES has identified a number of sectors and issues where it wants to make a difference by working together. SES is committed to improving the delivery of skills for the engineering, construction, health and social care, creative, digital and media and land-based sectors.</p>	
<p>Wealden District Council Open Space, Sports and Recreation Assessment 2016- 2028</p> <p><a href="https://www.wealden.gov.uk/UploadedFiles/Playing_Pitch_Strategy_-_August_2018.pdf">https://www.wealden.gov.uk/UploadedFiles/Playing_Pitch_Strategy_-_August_2018.pdf</a></p>	<p>This document provides a robust assessment of needs and deficiencies in open spaces in order to establish local provision standards and create an up-to-date evidence base which can be maintained to aid development and implementation of policies and the provision of open spaces during the Local Plan period.</p>	<p>To make sure enough suitable recreation facilities and open spaces are available for use by residents, with a set of quality and quantity standards for provision.</p>	<p>The Local Plan will be based on an update to this Assessment however, the findings should still be taken into account at the early stages of Local Plan preparation and the SA.</p>
<p>Wealden Green Infrastructure Study 2017</p> <p><a href="https://www.wealden.gov.uk/planning-and-building-control/planning-">https://www.wealden.gov.uk/planning-and-building-control/planning-</a></p>	<p>The purpose of this work was to assess the quantity, quality and accessibility of the District's green assets</p>	<p>Draws out key Green Infrastructure deficiencies and opportunities related to individual geographic areas of</p>	<p>There is likely to be an update to this study although the actual green infrastructure assets are unlikely to have significantly changed. The</p>

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
<a href="#">policy/planning-policy-evidence-base/bio-diversity-and-green-infrastructure/</a>	<p>that contribute to the green infrastructure network, including but not limited to trees, hedgerows, parks, public rights of way, rivers, farmland, churchyards and natural/semi natural green spaces. From this audit, the evidence identifies deficiencies within the network and makes recommendations for the provision and enhancement of green infrastructure to provide a coherent and accessible network for the benefit of both people and nature. The assessment also provides baseline information to inform the production of a Green Infrastructure Strategy for the District.</p>	<p>the district scale, sub-district scale and town scale.</p> <p>Provides a set of green infrastructure principles as well as a potential Strategic Green Infrastructure Network.</p>	<p>Local Plan and SA will need to take this study and any update into account in terms of helping to achieve net gains in biodiversity and a more natural capital approach to planning.</p>
<p>Wealden Gypsy and Traveller Accommodation Assessment (GTAA)– November 2016</p>	<p>This GTAA provides an assessment of current and future need for permanent Gypsy and</p>	<p>This assessment indicated that for period from 2016 to 2037/38, there was an additional permanent need for</p>	<p>The Council will need to update this evidence base, in line with updating the evidence base as a whole.</p>

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
<a href="https://www.wealden.gov.uk/planning-and-building-control/planning-policy/planning-policy-evidence-base/gypsy-and-travellers/">https://www.wealden.gov.uk/planning-and-building-control/planning-policy/planning-policy-evidence-base/gypsy-and-travellers/</a>	<p>Traveller accommodation in Wealden for the study period between 2016 and 2038. This assessment was undertaken following the change in definition to Gypsies, Traveller and Travelling Showpeople in 2015.</p>	<p>21 ‘travelling’ households in the district.</p>	<p>The Local Plan and SA will need to ensure the housing needs of Gypsies, Travellers and Travelling Showpeople are met.</p>
<p>Wealden Homelessness Strategy 2018-2023</p> <p><a href="https://wealdengovuk.azurewebsites.net/UploadedFiles/2018-2023%20Homelessness%20Strategy-1.pdf">https://wealdengovuk.azurewebsites.net/UploadedFiles/2018-2023 Homelessness Strategy-1.pdf</a></p>	<p>The Homelessness Strategy has been developed from the findings contained in the Review of Homelessness. This Strategy sets out how the Council will meet its priorities having regard to current legislation and available funding.</p>	<p>The Strategies priorities are to:</p> <ul style="list-style-type: none"> <li>• Prevent homelessness in the district and meet our obligations under the Homelessness Reduction Act 2017;</li> <li>• Secure accommodation for homeless households; and</li> <li>• Provide support for homeless households</li> </ul>	<p>The Local Plan and SA will need to take into account this Strategy (and any update) in the development of housing policies, particularly on need/supply and affordable housing.</p>
<p>Wealden Housing Strategy 2017-2020</p> <p><a href="https://www.wealden.gov.uk/UploadedFiles/Housing_Strategy_2017-2020.pdf">https://www.wealden.gov.uk/UploadedFiles/Housing Strategy 2017-2020.pdf</a></p>	<p>The Housing Strategy sets out Wealden District Council’s housing objectives and looks at how the Council and its partners are working to deliver these.</p>	<p>The three key areas for the Council are – communities, environment and local economy. The Housing Strategy seeks to meet these priorities by:</p>	<p>The Local Plan and SA will need to take into account this Strategy (and any update) in the development of housing policies.</p>

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
		<ul style="list-style-type: none"> <li>• Providing more homes that local people can afford, maintaining a balance between our rural settlements and market towns.</li> <li>• Contributing positively to people’s health, well-being and quality of life by striving to meet housing needs.</li> <li>• Improving the standard of homes in Wealden and to assist in the creation of a safer and more pleasant environment for all.</li> </ul> <p>It will do this by:</p> <ul style="list-style-type: none"> <li>• Increasing housing supply;</li> <li>• Improving housing quality; and</li> <li>• Providing housing advice and support for individuals and communities.</li> </ul>	
<p>Wealden Older Persons Housing and Support Strategy 2008-2028</p> <p><a href="https://www.wealden.gov.uk/UploadFiles/WealdenStrategyApprovedVersion-1.pdf">https://www.wealden.gov.uk/UploadFiles/WealdenStrategyApprovedVersion-1.pdf</a></p>	<p>The strategy has been produced in partnership with East Sussex County Council and a number of other key stakeholders to specifically address</p>	<p>The strategy aims ‘To enhance the social inclusion, dignity, choice and independence of older people living in Wealden District Council, by maintaining people in their own homes and</p>	<p>The Local Plan and SA will need to take into account this Strategy (and any update) in the development of housing policies.</p>

Policy/programme/strategy/initiative	Description	Objectives, key targets and indicators	Implications/Considerations for the SA and LP
	issues relating to older persons housing and support.	through the provision of a range of housing and housing related support services'.	

## Appendix B: Compatibility of SA Objectives

<b>SUSTAINABILITY APPRAISAL OBJECTIVES</b>	1																	
	2	+																
	3	+	+															
	4	+	+	?														
	5	+	+	+	+													
	6	+			+													
	7	+	?	?	+	+	+											
	8					+	?	+										
	9	+			+	+	?	+	+									
	10	x		x		?	x	x	x	x								
	11	+	+	?	+			?	?	+	+							
	12	?	?			x		?			?	+						
	13	+			+			+	+	?	+	+	+					
	14							+	+	+	?			+				
	15	+			+		?	?			?	?		+	?			
	16									?	?	+			+	?		
	17			?							?	+			?		+	
	18													?	?			+
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
	<b>SUSTAINABILITY APPRAISAL OBJECTIVES</b>																	

<b>KEY</b>	+	Positively compatible
	x	Possible conflict
	?	Uncertain
		Neutral



## Appendix C: Draft SA Monitoring Framework

SA Objective	Monitoring Indicator	Monitored through
1. To tackle the climate emergency by reducing greenhouse gas emissions, protecting existing carbon sinks and increasing their potential to store carbon, promoting zero carbon technologies and renewable energy technologies.	Percentage of new dwellings achieving or bettering the Target Emission Rate and Target Fabric Energy Efficiency rate set out in Approved document L1A of the Building Regulations 2010 (as amended)	Building Regulations Approved Document L1A  WDC Monitoring of planning applications and completions
	Proportion of new non-residential buildings over 100sqm to meet the relevant BREEAM “excellent” standard	Building Regulations Approved Document L2A  WDC Monitoring of planning applications and completions
	Energy trends data at LA level <ul style="list-style-type: none"> <li>• Energy consumption all sectors (GWh)</li> <li>• Annual gas and electricity consumption kWh (domestic)</li> </ul>	BEIS <sup>191</sup> Data
	Percentage of regulated CO <sub>2</sub> emissions saved below Building Regulations 2010 target level through all low carbon measures	Building Regulations  WDC Monitoring of planning applications and Building Regulations compliance
	CO <sub>2</sub> emissions per capita	BEIS Data

<sup>191</sup> Department for Business, Energy & Industrial Strategy

SA Objective	Monitoring Indicator	Monitored through
	Level of installed capacity for large scale renewable energy (wind and solar)	BEIS, 'Renewable Energy Planning Database
	Number of properties achieving a SAP rating equal to or better than the standardised rating for the type of dwelling	Building Regulations  WDC Monitoring of planning applications and Building Regulations compliance
	Area (ha) of carbon storing habitat lost/gained	WDC Monitoring of planning applications and biodiversity net gain metric.
2. To adapt to the effects of a changing climate by protecting and managing water resources	Number/proportion of new residential development with a water consumption target of 110 litre/person/day	Building Regulations  WDC Monitoring of planning applications and Building Regulations compliance
	Number of new developments that have incorporated sustainable drainage in their development; by type of sustainable drainage technique	WDC Monitoring of planning applications and completions
	Change in area of permeable surfacing (net gains and net losses in sqm) as a result of new developments	WDC Monitoring of planning applications and completions
	Number of new developments that have incorporated water efficient design	WDC Monitoring of planning applications and completions

<b>SA Objective</b>	<b>Monitoring Indicator</b>	<b>Monitored through</b>
3. To adapt to and mitigate the risk of flooding from all sources taking account of the impact of climate change	Planning permissions granted contrary to EA advice on flood grounds	WDC Monitoring of planning applications and completions
	Change in area of permeable surfacing (net gains and net losses in sqm) as a result of new developments	WDC Monitoring of planning applications and completions
	Number of new developments that have incorporated sustainable drainage in their development	WDC Monitoring of planning applications and completions
4. To reduce pollution (air, noise, light, water and soil), improve air and water quality and minimise impacts associated with development	Number of new developments that incorporate measures to reduce noise	WDC Monitoring of planning applications and completions
	Number of new developments that incorporate measures to reduce light pollution	WDC Monitoring of planning applications and completions
	Planning permissions granted contrary to EA advice on water quality grounds	WDC Monitoring of planning applications and completions
	Number of days p.a. when air pollution is moderate or high for PM10*  *Daily mean particles (PM10) not to exceed 50 micrograms per cubic metre, more than 35 times a year, at any measuring site	TBC

SA Objective	Monitoring Indicator	Monitored through
	Number of new developments that have incorporated sustainable drainage in their development following the treatment train	WDC Monitoring of planning applications and completions
5. To protect and enhance existing habitats, species and biodiversity and deliver measurable biodiversity net gain	Loss of or inappropriate development on designated sites: <ul style="list-style-type: none"> <li>• SSSIs</li> <li>• LWSs</li> <li>• LNRs</li> </ul>	WDC Monitoring
	Proportion of SSSI units in favourable or unfavourable recovering conditioning	Natural England
	Water bodies classified under the Water Framework Directive to achieve good ecological status	Environment Agency monitoring
	No of developments which improve on-site biodiversity by incorporating new features and/or habitats, by type of features (achieving biodiversity net gain)	WDC Monitoring of planning applications and completions
	No of developments incorporating green roofs, by type (biodiverse not sedum)	WDC Monitoring of planning applications and completions
	Area of district deficient in access to natural green spaces (hectares) (includes Local Wildlife Sites; SSSIs and other natural areas)	WDC Monitoring

<b>SA Objective</b>	<b>Monitoring Indicator</b>	<b>Monitored through</b>
	Progress on SAMM Strategy projects	WDC Monitoring  Conservators of Ashdown Forest
	Level of net gains in biodiversity units by type and location	WDC Monitoring of planning applications and completions
	No. of developments which improve off-site biodiversity by delivering strategic biodiversity net gain	WDC Monitoring of planning applications and completions
6. To prevent and reduce the amount of waste, and minimise the use of non-renewable resources	Quantity of household waste reused, recycled and composted	Waste Team, Communities, Economy and Transport Department, East Sussex County Council
	Quantity of household collected waste land filled	
	Percentage of new development using sustainable construction and local materials/products	WDC Monitoring of planning applications and completions
7. To protect and enhance the quality and range of natural green spaces and to improve the wider green infrastructure network	Loss/inappropriate development on designated and non-designated natural green spaces	WDC Monitoring of planning applications and completions
	Number of new developments providing green infrastructure as part of scheme i.e. green roof, hedgerows etc.	WDC Monitoring of planning applications and completions

SA Objective	Monitoring Indicator	Monitored through
	Ecosystem services provision pre and post development of the site	WDC Monitoring of planning applications and completions
8. To ensure development protects existing open spaces and creates open space in areas of deficiency, in regards to quantity and quality standards	Amount of new open space created in line with quality and quantity standards, including Accessible Natural Greenspace Standards (ANGSt)	WDC Monitoring of planning applications and completions
	Amount/type of open space lost to development	WDC Monitoring of planning applications and completions
9. To conserve and enhance the districts countryside, landscape, historic environment and cultural assets and improve accessibility as relevant	Number and type of developments granted within the High Weald AONB	WDC Monitoring of planning applications and completions
	Development granted which affects listed building/heritage assets	WDC Monitoring of planning applications and completions
10. To ensure development makes efficient use of land, buildings and infrastructure including previously developed land	Number of contaminated land sites, remediated or investigated with no further requirement for remediation	WDC
	Proportion of new homes built of PDL	WDC Monitoring of planning applications and completions
	Housing commitments by land type	WDC Monitoring of planning applications and completions
	Average density of new house building	WDC Monitoring of planning applications and completions

<b>SA Objective</b>	<b>Monitoring Indicator</b>	<b>Monitored through</b>
11. To improve the quality of the built environment and promote high quality and sustainable urban design, including preserving and, where possible, enhancing the district's heritage assets and their settings	Number of heritage assets on/added/removed from the English Heritage "Heritage At Risk" Register p.a.	WDC Monitoring
	The level of satisfaction with the design and layout of new housing schemes	WDC Monitoring
	Proportion of new residential developments that meet the equivalent of Code for Sustainable Homes Level 3	WDC Monitoring of planning applications and completions
	Proportion of new non-residential buildings over 100sqm to meet the relevant BREEAM "excellent" standard	WDC Monitoring of planning applications and completions
12. To provide a range of high quality homes, including affordable housing, to meet local needs	Percentage of all new housing completions which is affordable housing – by type and tenure	WDC Monitoring of planning applications and completions
	Net completions by dwelling size	WDC Monitoring of planning applications and completions
	Percentage of new homes built to wheelchair standards on developments	WDC Monitoring of planning applications and completions
	Percentage of new homes built to equivalent Lifetimes Homes standards	WDC Monitoring of planning applications and completions
13. To promote healthy, safe and inclusive communities, and promote equal opportunities including allowing people to remain independent	Number of recorded crimes pa. Retain position for lowest crime figures in East Sussex area.	Home Office, Police Recorded Crime (PRC)

SA Objective	Monitoring Indicator	Monitored through
	Progress on Public Transport improvements	WDC Monitoring
	Number of developments providing cycle and walking infrastructure	WDC Monitoring
	Amount of completed/committed floorspace in clinic/health centre use	WDC Monitoring
	Percentage of residential development within 20 mins of sports facilities	WDC Monitoring of planning applications and completions
	Amount of open and recreational space provided to appropriate quality and quantity standards – particularly in identified deficient areas	WDC Monitoring of planning applications and completions
	Percentage of households in fuel poverty	WDC Monitoring
	Claimant rate for Job Seekers Allowance and Universal Credit	Department for Work and Pensions
14. To ensure access to local services and facilities, including local shopping, leisure facilities, open space, sport and recreation opportunities	Number of planning obligations achieved and money raised for community uses by type (health, sport, education, etc.)	WDC Monitoring
	Amount of loss or gain of commercial, business and service floorspace (Class E) within town centre boundaries.	WDC Monitoring



SA Objective	Monitoring Indicator	Monitored through
	Amount of loss or gain of commercial, business and service floorspace (Class E) within town centre boundaries.	WDC Monitoring
	Percentage of residential development within 20 mins of sports facilities	WDC Monitoring of planning applications and completions
	Percentage of residential development within 15 mins walking/cycling of a town centre	WDC Monitoring
15. To reduce reliance on private transport modes, encourage alternatives to the car, and enhance safer routes and permeability for walkers and cyclists	Percentage of completed non-residential development complying with maximum parking standards set out in the Local Plan	WDC Monitoring
	Number of developments with Travel Plans	WDC Monitoring
	Number of developments providing cycle and walking infrastructure	WDC Monitoring
	Level of parking occupancy in town and local centre car parks	WDC Monitoring
	Percentage of residential development within 15 mins walking/cycling of a town centre	WDC Monitoring

<b>SA Objective</b>	<b>Monitoring Indicator</b>	<b>Monitored through</b>
16. To increase the vitality, viability and uniqueness of the district's existing town centres, local centres and village centres	Vacancy rates within designated shopping frontages for town centres, local centres and village centres	WDC Monitoring
	Level of loss or gain of commercial, business and service use (Class E) floorspace within town centres, local centres and village centres	WDC Monitoring
17. To promote sustainable economic growth and employment opportunities including access to jobs	Amount of employment floorspace lost to completed non-employment uses (identifying use classes)	WDC Monitoring
	Number of completed small business units under 250sqm	WDC Monitoring
	No of workers in the district (employees in employment)	WDC Monitoring
18. To improve the level of skills, education and training of the population	Number of developments including educational facilities	WDC Monitoring ESCC
	Proportion of developments providing apprenticeships or work based training	WDC Monitoring

## Appendix D: Draft Policy Options Appraisal Matrix

<b>Policy Name:</b>						
<b>Reasonable Alternatives/Options for Assessment</b>						
<b>A:</b>						
<b>B:</b>						
<b>C:</b>						
<b>D:</b>						
<b>E:</b>						
<b>SA Objective</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>	<b>E</b>	<b>Assessment</b>
1. Climate Change						
2. Water resources						
3. Flood risk						
4. Air, noise, light pollution						
5. Habitats, species, biodiversity						
6. Green Infrastructure						
7. Minimise waste & maximise recycling						
8. Protect & create open space						

9. Conserve & enhance landscape, countryside & historic environment						
10. Make efficient use of land						
11. Improve quality of built environment, high quality design						
12. Provide a range of high quality homes, including affordable						
13. Promote healthy, safe and inclusive communities						
14. Ensure access to local services and facilities						
15. Reduce private transport, promote walking/cycling						
16. Increase the vitality, viability of town, local and village centres						
17. Promote sustainable economic growth and employment						
18. Improve the level of skills, education and training						
<b>Conclusion/Justification</b>						
<b>A:</b>						
<b>B:</b>						

<b>C:</b>				
<b>D:</b>				
<b>E:</b>				
<b>Other Options considered and not appraised:</b>				
<b>Preferred Policy Option:</b>				
<b>Preferred Option Predicted Impact</b>	<b>Short Term</b>	<b>Medium Term</b>	<b>Long Term</b>	<b>Commentary</b>
1. Climate Change				
2. Water resources				
3. Flood risk				
4. Air, noise, light pollution				
5. Habitats, species, biodiversity				
6. Green Infrastructure				
7. Minimise waste & maximise recycling				
8. Protect & create open space				
9. Conserve & enhance landscape, countryside & historic environment				
10. Make efficient use of land				

11. Improve quality of built environment, high quality design				
12. Provide a range of high quality homes, including affordable				
13. Promote healthy, safe and inclusive communities				
14. Ensure access to local services and facilities				
15. Reduce private transport, promote walking/cycling				
16. Increase the vitality, viability of town, local and village centres				
17. Promote sustainable economic growth and employment				
18. Improve the level of skills, education and training				
<b>Recommendations and mitigation measures:</b>				
<b>Cross border impacts:</b>				
<b>Overall conclusion:</b>				

## Appendix E: Draft Site Options Appraisal Matrix

Key: Conclusion

✓	Performs well
?	Marginal
x	Performs poorly

<b>Site Options [Insert Settlement Name]:</b>
<b>Settlement Category:</b>
<b>Development Type: [Housing/Employment/Leisure etc.]</b>
<b>Units / Floorspace:</b>
<b>Reasonable Alternatives/Options for Assessment</b>
<b>Site A:</b>
<b>Site B:</b>
<b>Site C:</b>
<b>Site D:</b>
<b>Site E:</b>

<b>SA Objective</b>	<b>Site A</b>	<b>Site B</b>	<b>Site C</b>	<b>Site D</b>	<b>Site E</b>	<b>Assessment</b>
1. Climate Change						
2. Water resources						
3. Flood risk						
4. Air, noise, light pollution						
5. Habitats, species, biodiversity						
6. Green Infrastructure						
7. Minimise waste & maximise recycling						
8. Protect & create open space						
9. Conserve & enhance landscape, countryside & historic environment						
10. Make efficient use of land						
11. Improve quality of built environment, high quality design						
12. Provide a range of high quality homes, including affordable						
13. Promote healthy, safe and inclusive communities						
14. Ensure access to local services and facilities						
15. Reduce private transport, promote walking/cycling						



16. Increase the vitality, viability of town, local and village centres						
17. Promote sustainable economic growth and employment						
18. Improve the level of skills, education and training						
<b>Conclusion</b>						



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