



HAILSHAM TOWN COUNCIL

NEIGHBOURHOOD PLANNING COMMITTEE AGENDA

Notice is hereby given of

A meeting of the **Neighbourhood Planning Committee**, to be held at the Fleur-de-Lys Council Chambers/Meeting Rooms, Market Street, Hailsham, on

Thursday 21st March 2019 at 7.00 p.m.

1. **Public Forum**
A period of not more than 15 minutes will be assigned for the purpose of permitting members of the public to address the committee or ask questions on matters relevant to the responsibilities of this committee, at the discretion of the Chairman.
2. **Apologies for Absence**
To receive apologies for absence from council and lay members of the committee.
3. **Declarations of Interest**
To receive notice of declarations of personal and prejudicial interest in respect of items on this agenda
4. **Valediction**
To formally acknowledge the invaluable input made to the Hailsham Neighbourhood Plan by the late Councillor Glenn Moore.
5. **Minutes of Previous Meeting**
To note & adopt or amend the minutes of the meeting of the Neighbourhood Planning Committee held on Thursday 13th December 2018.
6. **Strategic Environmental Assessment (SEA), Habitats Regulation Assessment (HRA) and Amended Neighbourhood Plan**
To receive an update on the SEA, HRA and amended Neighbourhood Plan and resolve to submit them to the Town Council as the final documents.
7. **Confidential Business**
To resolve that the press and public are temporarily excluded during the discussion on the **next item (8)** of the agenda as it concerns: The preparation of cases in legal proceedings

in accordance with the Council's Standing Orders No. 1E.

8. **Habitats Regulation Assessment (HRA)**
To resolve to submit the Draft Confidential version of the Hailsham Neighbourhood Plan Habitat Regulation Assessment to the Town Council as the final document.
9. **Neighbourhood Plan Timetable**
To consider the amended timeline for the Hailsham Neighbourhood Plan
10. **Financial Statement**
To note the financial statement of expenditure against budget for the project and discuss the budget if necessary

Dated 13th January 2019



JOHN HARRISON
Town Clerk

**Committee Membership;
Cllrs -**

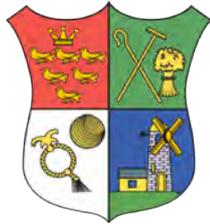
Mary Laxton
Barbara Holbrook
Paul Holbrook
Frank Berry
Nigel Coltman
Nick Collinson
Charlotte Collinson-O'Toole
John Puttick

Non-Council Members

Mr K. Hinton

Substitute Members; Cllrs -

Graham Moore
Gavin Blake-Coggins
Alexa Clarke
Grant De Jongh
Alex Willis
Richard Grocock



HAILSHAM NEIGHBOURHOOD PLAN

The logo features a horizontal line with several stylized houses and trees in various colors (orange, green, blue, yellow) above it. Below the line, the text "HAILSHAM NEIGHBOURHOOD PLAN" is written in a bold, black, sans-serif font.

**HAILSHAM NEIGHBOURHOOD PLAN
SUBMISSION VERSION
MARCH 2019**

HAILSHAM TOWN COUNCIL

*When the Monks came up from old Marshfoot,
Each man to ring his bell.
And they rang with zeal, and rang with skill,
And they rang the changes well.*

*And the Monks would listen to Michelham Tower,
For those bells were of good renown.
And few there were that could compare,
With Saint Mary's of Haylesham Town.*



The Hailsham Neighbourhood Plan was shortlisted in the Neighbourhood Planning category at the 2018 Planning Awards

Hailsham Neighbourhood Plan
Submission version: March 2019

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The Hailsham Town Crest includes a ball of twine and rope 'dolly', representing the rope making industry in the town. This neighbourhood plan includes a series of entwined rope images, reflecting this period in the town's history.

Note: This document has been formatted for double-sided printing. This explains any blank pages between chapters.

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Dedication to Councillor Glenn Moore

The Neighbourhood Planning Committee dedicates this Plan in Memory of Cllr Glenn Moore whose sole purpose for having a Plan in place was to "Make Good" for the residents of Hailsham. His planning knowledge and expertise was invaluable to ensure our Plan is fit for purpose.

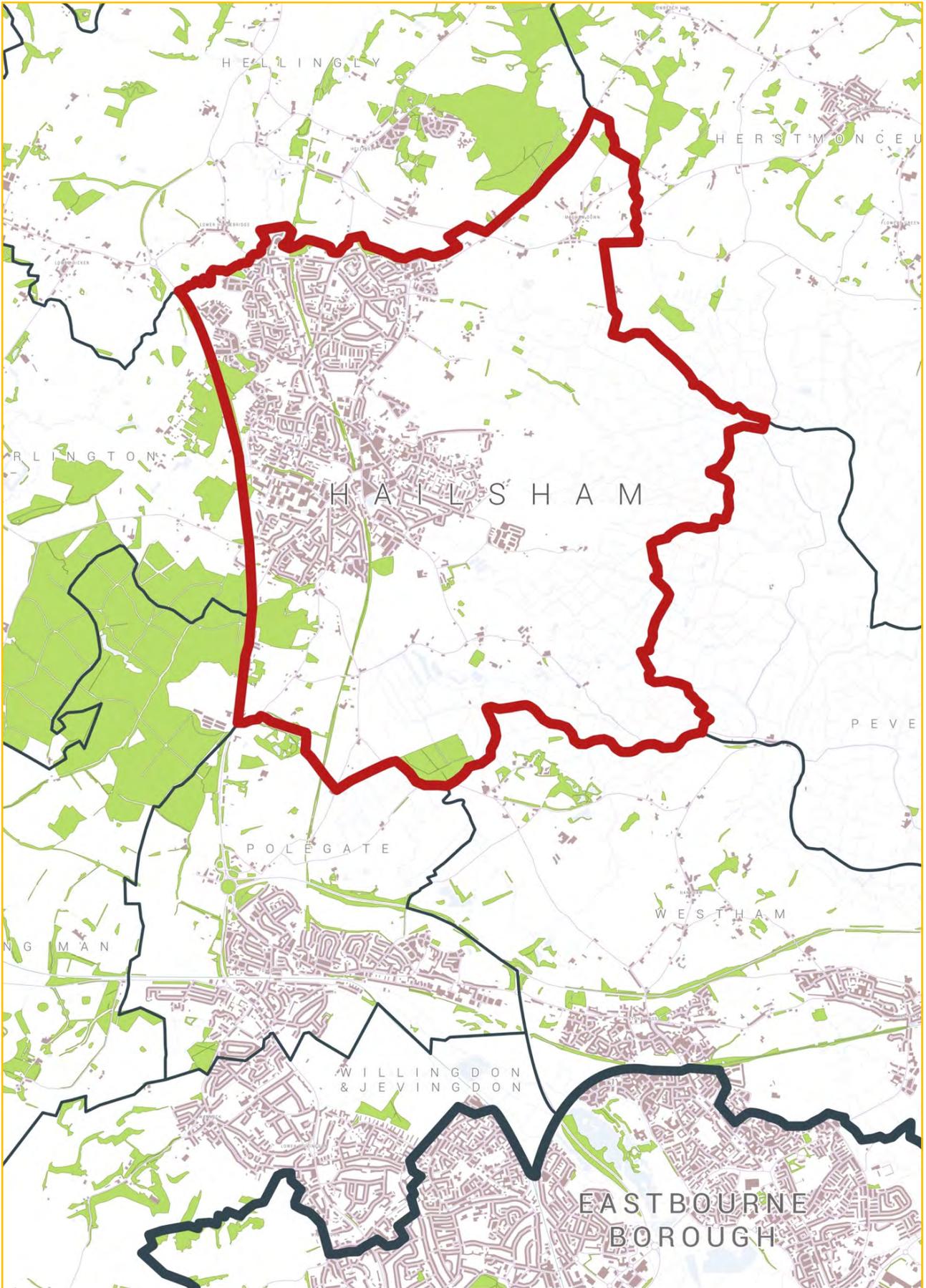


Figure 1: The Hailsham Neighbourhood Plan area, which follows the Town Council boundary

1. Introduction



1.1: A plan for Hailsham

This is the submission version Hailsham Neighbourhood Plan. It covers the town and parish of Hailsham, as illustrated in Figure 1. It sets out the local community's aspirations for Hailsham over the period to 2028¹ and establishes policies in relation to land use and development. These are policies that will influence future planning applications and decisions in the area. But the Neighbourhood Plan is much more than this. It represents the community's manifesto for the area, bringing together more than just traditional planning matters.

The purpose of neighbourhood planning is to give local people and businesses a much greater say in how the places they live and work should change and develop over time. Neighbourhood planning is designed to give local people a very real voice in deciding the look and feel of an area, from determining the location of shops, offices and schools for example, to identifying sites and development standards for new housing.

The Neighbourhood Plan for Hailsham is helping to bring residents and businesses together as a stronger, more inclusive community. The Town Council has spoken to many people through the process of making this Plan and has real pride in the way the community has come together. It is clear that the community is passionate about Hailsham and the Town Council hopes the Neighbourhood Plan will influence change that makes it a better place to live, grow up, work and do businesses.

This Plan has been informed by consultation with the community on the issues and opportunities in the area, a vision for the future of Hailsham and policy ideas for getting there. A draft version of the Plan was also subject to a formal eight-week consultation period (Regulation 14). Comments and responses received through that process, from residents, businesses, statutory consultees and others, were reviewed and have informed this submission version of the Plan, which will now be subject to independent examination.

¹ This timeframe is the same as that covered by the emerging Wealden District Local Plan

1.2: Structure of the plan

Following this introduction that Plan comprises thirteen further sections. These are:

- Section 2: ‘Hailsham Today’, presents an overview of the area covered by the Neighbourhood Plan, what the adopted Development Plan and the emerging Wealden Local Plan says about it, key issues and comments raised during consultation.
- Section 3: ‘Hailsham Tomorrow’, presents the vision and objectives for Hailsham, as well as overarching principles guiding sustainable development.
- Sections 4 – 12: These sections present the policies, associated projects and ambitions for Hailsham. These are presented along the following lines:
 - Part A: Policies, projects and ambitions related to the Neighbourhood Plan area as a whole and covering matters such as design quality, green space and transport.
 - Part B: Policies, projects and ambitions relating to areas of potential future growth around Hailsham.
 - Part C: Policies, projects and ambitions relating to the town centre.
- Section 13: ‘Community Infrastructure Levy’, outlining the approach to spending of monies received by the Town Council through the Community Infrastructure Levy payable by developers.
- Section 14: ‘Next steps’ outlines the current stage in the plan making process, and what the future steps are.

Within Sections 4 – 12 each topic area includes some introductory and explanatory text followed by one or both of the following:

Policy Box

The Neighbourhood Plan establishes land use and development management policies for Hailsham. These are contained in policy boxes, like this one.

Projects / Aspirations Box

The Neighbourhood Plan covers more than just traditional planning matters as it presents the community’s vision for the area. Items that the community are seeking, but that cannot be delivered through planning policy, are identified and contained in project / aspiration boxes, like this one.

It is important that the Plan is read as a whole. All policies should be viewed together and not in isolation in the preparation and consideration of planning applications.

1.3: Who has prepared the plan?

The Localism Act 2011² gave communities the power to develop neighbourhood plans, to be progressed by Town and Parish Councils or neighbourhood forums as opposed to the local authority.

Work on this Plan has been led by Hailsham Town Council who established a committee of Council members and interested residents to consult upon and develop the Plan.

Through the work to-date the committee has endeavoured to engage, enthuse and energise Hailsham residents and the wider community, including businesses and other stakeholders and organisations, to have their say on the town's future and help shape the Neighbourhood Plan.

1.4: What is in the neighbourhood plan?

Neighbourhood Plans can take many different shapes and forms. They can set out detailed policies and allocate sites for development, they can present generic principles for an area and they can focus on a particular theme or issue. There is no prescribed format.

Based upon the work undertaken, including the engagement and consultation exercises, we think there are opportunities in Hailsham to influence the quality of future development, to improve the look and feel of the town centre, the shops and services within it, to enhance the quality of green spaces, access and movement around the town. Locally specific policies and proposals in the Neighbourhood Plan will influence the nature of future change.

1.5: What is not in the neighbourhood plan?

Existing planning policy for the area is set out through a combination of national planning policies (see the National Planning Policy Framework: NPPF³) and the Wealden Local Plan⁴.

These provide strategic policy directions, including the number of new homes that need to be provided over the plan period, and where. Where a particular issue or subject is not covered in the Neighbourhood Plan, the NPPF and Wealden District Council's Local Plan will provide the policy framework for shaping and determining planning applications.

It is important to note that this Neighbourhood Plan does not allocate sites for new development. Rather, it is Wealden District Council as Local Planning Authority who identify locations for growth in and around Hailsham through their Local Plan. It is a requirement of legislation that the Neighbourhood Plan conforms with the Local Plan. The adopted Core Strategy identifies land for growth to the north and east of Hailsham. The emerging Local Plan and evidence underpinning this suggests that further growth and development will take place around Hailsham in the future. The Town Council has taken the pragmatic view that if change is to happen, then the Neighbourhood Plan is the vehicle for shaping this such that it is done in the 'right way' and brings benefits to the Hailsham. The Neighbourhood Plan is very much an opportunity, not a threat, and fleshes out how future change should come forward to benefit Hailsham as a whole.

² <http://www.legislation.gov.uk/ukpga/2011/20/contents/enacted>

³ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁴ The current 'Development Plan' comprises the Core Strategy (2013), saved Local Plan policies (1998), the Affordable Housing Delivery Local Plan (2016) and the East Sussex County Council Waste and Minerals Plan (2017). The emerging Wealden Local Plan was submitted for examination purposes in January 2019. However, the evidence prepared to inform the emerging Local Plan has been used where appropriate to inform this Neighbourhood Plan.

Following the recommendations of the independent examination a referendum will be held, where all people of voting age residing within the Plan area will be able to cast a vote on whether they think the Neighbourhood Plan should be brought into force ('made'). If more than 50% of people vote yes, it will then be used to shape planning decisions and applications in Hailsham.

1.6: What is the process for preparing the Neighbourhood Plan?

There are a number of stages involved in preparing a Neighbourhood Plan. Broadly, they include:

- a) Initial consultation to identify issues, concerns and areas of focus for the Neighbourhood Plan.
- b) Collection of 'evidence' on the issues and potential options, ideas and strategies to be progressed through the Plan.
- c) Production of and consultation on emerging policy ideas.
- d) Drafting of and consultation on a preferred strategy for the Neighbourhood Plan.
- e) Review of the Neighbourhood Plan to see whether it is in general conformity with the strategic objectives of the development plan and prepare a version for pre-submission consultation
- f) Submit and test the Neighbourhood Plan through an independent examination process.
- g) Subjecting the Neighbourhood Plan to a local referendum.
- h) Adopting ('making') the Neighbourhood Plan as a policy document – if more than 50% of people vote 'yes' at the referendum.

More information on the neighbourhood planning process can be found on the MHCLG website⁵.

Production of this Plan has already been through many of the stages outlined above. This is the submission version of the Plan and will be subject to independent examination. This includes a further round of consultation, with the responses being considered by the Inspector appointed to examine the Plan.

Comments have been made at various consultation events and we would encourage you to continue contacting us with your thoughts and ideas. Further details can be found on the Hailsham Neighbourhood Plan website and through other social media channels. We look forward to hearing from you.

- >> *Website:* <http://hailshamneighbourhoodplan.co.uk>
- >> *Facebook:* www.facebook.com/hailsham.towncouncil.3
- >> *Twitter:* [www.twitter.com/HailshamTC](https://twitter.com/HailshamTC) -- @HailshamTC

⁵ <https://www.gov.uk/guidance/neighbourhood-planning--2>

2. Hailsham Today



2.1: The study area

Hailsham is the largest of the five main towns within Wealden District. It sits amongst the lowland forests and marshes of the Sussex Weald and is a gateway to the South Downs National Park. Hailsham is a market town – its charter was granted in 1252 – and its history can be traced back to the Domesday Book. The Parish has a population of about 24,600 people, the majority of whom live in the town. The town has experienced significant expansion since 1945.

The town's traditional industry was in rope making. Today, industrial areas at Diplocks Way and Station Road, as well as commercial premises in the town centre, comprise the main areas of employment in the town.

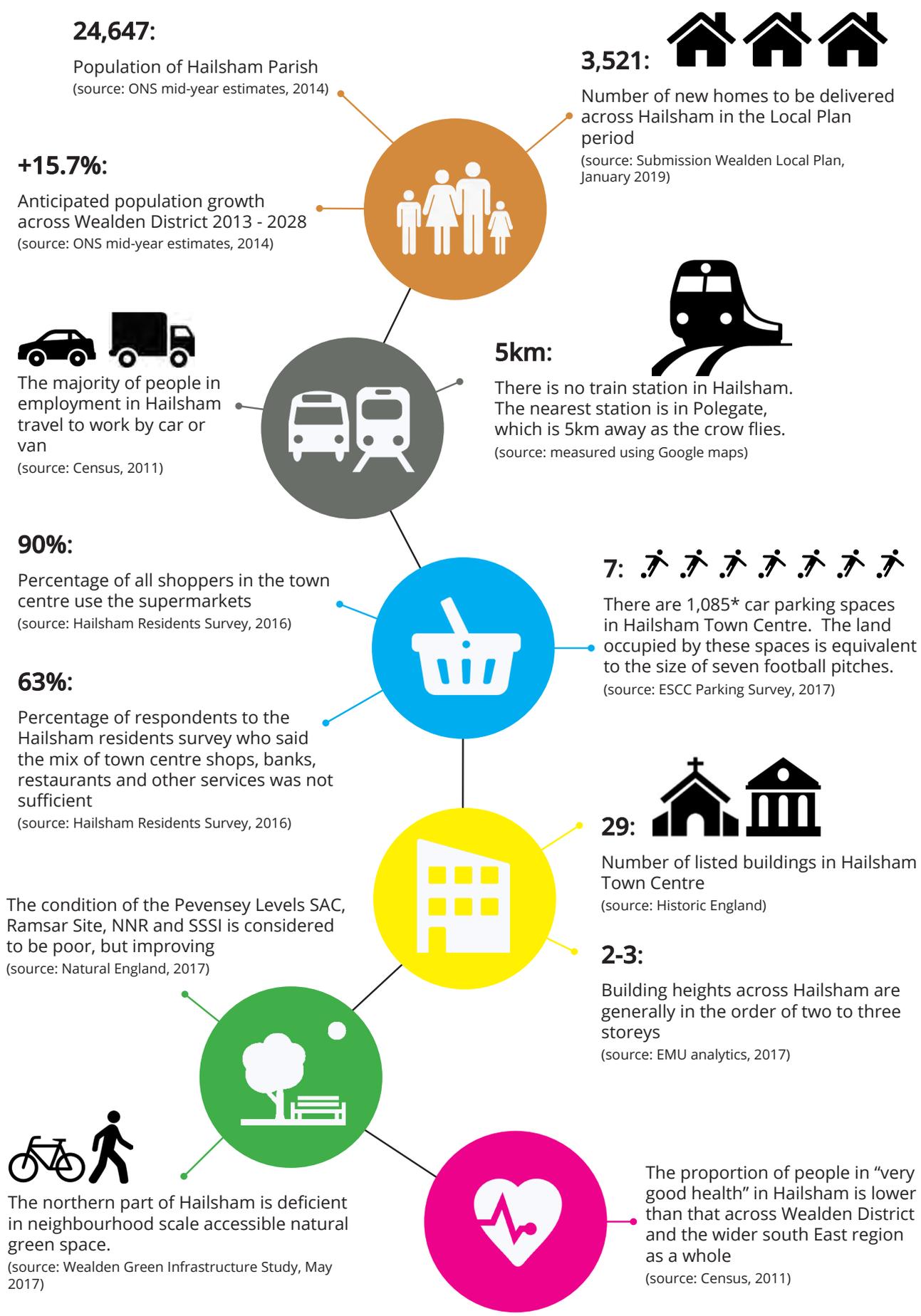
The town is located approximately 5km north of Polegate and 15km north of Eastbourne, which is the nearest large town. These towns were previously connected to each other by rail, though the route through Hailsham was removed as a result of the Beeching report. In its place is now the Cuckoo Trail: a green walking and cycle route running north south through Hailsham. Main road connections to and from the town comprise the A22 and A27.

Close to the town is the Pevensey Levels: a low-lying wetland of national and international conservation importance. It is designated as a Site of Special Scientific Interest, a Ramsar Site, and Special Area of Conservation. It comprises an extensive drainage network and is vulnerable to the effects of climate change and eutrophication. The environment of the Pevensey Levels needs careful management.

The following issues have been identified through a combination of the consultation exercises, analysis and research undertaken to underpin the Neighbourhood Plan:

- Historically poor quality large scale developments which have failed to create locally distinctive places or enrich the existing built heritage of the town.
- Lack of comprehensive cycling and pedestrian infrastructure, with high dependence on private car journeys.
- No train station and poor access via public transport to national train services at Polegate across the town, acting as a barrier to residents to accessing employment, education, services and facilities.
- A deficit of high quality, attractive public green space provision in some urban areas of Hailsham.
- Under provision of retail and commercial space to meet the needs of local businesses, or attract sustained inward investment from national high-street retailers.
- Lack of leisure and recreational facilities which are well connected or responsive to local need/demand.
- Underinvestment in key services and infrastructure.
- Higher than average long-term health conditions and areas of social deprivation within Hailsham.
- Meeting the needs of an ageing population.

Figure 2 summarises some of the key challenges for the Neighbourhood Plan.



* Number of parking spaces includes those at Tesco and Asda

Figure 2: Hailsham facts and figures

2.2: The Local Plan

“The Wealden Plan’s proposals for the scale of urban expansion in Hailsham has been debated at great length by the Town Council. The consensus has come down on the side of pragmatism, and this Council has in its response, presented an argument that whatever level of development is allocated to Hailsham, it can only come if the full requisite level of supporting infrastructure is delivered alongside.”

CLlr Glenn Moore – Chair, Neighbourhood Planning Committee

The neighbourhood planning regulations state that, for neighbourhood plans to be ‘made’, they must demonstrate how they satisfy what are called the ‘basic conditions’. These include being in general conformity with the strategic objectives of the Local Plan. For Hailsham, the Local Plan is that prepared by Wealden District Council⁶.

The current Local Plan for Wealden (‘The Core Strategy’) was approved by full council in November 2012 and formally adopted in February 2013. It covers the period 2013 to 2027. The production of the Core Strategy and the evidence underpinning it were effectively prepared before publication of the NPPF (in 2012).

The Inspector who examined the Core Strategy recommended that it be adopted subject to making a number of modifications, including the introduction of a clear commitment to commencing an early review of the Core Strategy. That review is now being undertaken and the new Local Plan is being prepared by Wealden Council at the same time as this Neighbourhood Plan. Additionally, work by Wealden Council on the Strategic Sites identified in the Core Strategy was submitted for examination in 2014 and eventually withdrawn in 2015, with the District Council instead deciding to progress with work on the new Local Plan. However, until the new Local Plan is adopted, the Core Strategy, plus those policies ‘saved’ from the previous Wealden Local Plan adopted in 1998 are used for determining planning applications. A non-statutory Local Plan was prepared by Wealden District Council in 2005 but this carries little weight. This means that the current Local Plan policy framework for Hailsham is limited. It is thus essential to have a new Plan in place to steer development and investment in Hailsham.

Given the stages involved in the production of the new Local Plan, it is likely that the Neighbourhood Plan will reach the referendum stage ahead of Local Plan adoption. The Neighbourhood Plan does however make use of Wealden District Council’s most up-to-date evidence base and, in so doing, seeks to align with potential policies detailed in the emerging Local Plan. It also refers as appropriate to existing policy.

The adopted Core Strategy identifies land to the north and north east of Hailsham for growth and development (See Appendix A) The emerging Local Plan, which covers the period up to 2028, sets ambitious growth targets for Hailsham, including around 3,521 new homes, of which approximately 2,720 will be delivered on growth sites on the periphery of the town⁷. These include those sites in the adopted Core Strategy, as well as additional sites to the east and south of the existing built-up area (Appendix A). Growth to the north of Hailsham falls outside the Parish boundary, and thus the Neighbourhood Plan area. Although the Neighbourhood Plan cannot directly establish policies for this area it is important to consider the implication of this area as it directly abuts and thus impacts upon the town.

⁶ see

http://www.wealden.gov.uk/Wealden/Residents/Planning_and_Building_Control/Planning_Policy/Wealden_Local_Plan/Wealden_Local_Plan_Submission_Library.aspx

⁷ These figures, and associated Policies in the emerging Local Plan, are subject to change at the time of writing

The submission Local Plan also recognises the potential for windfall development to come forward across Hailsham on sites within the built-up area. Policy WLP7 of the submission Local Plan makes allowance for 300 new homes within the town centre on windfall sites and a further 501 new homes elsewhere within the Hailsham development boundary (which includes some land outside the Neighbourhood Plan area).

Although the emerging Local Plan has not yet been adopted, it does show the direction of travel and a clear need for new growth and development in and around Hailsham.

This Neighbourhood Plan does not seek to provide a development and growth figure for Hailsham, nor does it seek to identify sites and allocate land for development. Rather, it accepts as its starting point that some form of development will take place in the future and that it is important that this is done in the right way to bring as many benefits to Hailsham as possible. The Neighbourhood Plan thus seeks to establish place-based principles and policies to ensure that development comes forward in such a way that helps to create successful places.

Both the existing Core Strategy and the emerging Local Plan are, quite rightly, concerned with the impact of development in the district on the Ashdown Forest (to the north of Wealden), and the Pevensey Levels, immediately to the south and east of Hailsham. Associated with this are concerns about infrastructure delivery and, in particular, provision of waste water treatment works to serve the proposed scale of growth in Hailsham. If this infrastructure cannot be delivered Wealden District Council note that this might trigger a review of the Local Plan in 2022 (subject to when the emerging Local Plan is adopted).

So, given the current status of the Local Plan, and that it might be subject to review again in 2022, subject to whether the Local Plan is adopted, this Neighbourhood Plan includes some policies and principles that might otherwise be included in the Local Plan. This is to avoid a potential future gap in policy.

2.3: What you told us

The consultation exercises undertaken at the outset of the Neighbourhood Plan process identified a range of issues of importance for addressing in the Neighbourhood Plan. In particular:

- It is clear that residents consider that investment in infrastructure provision, particularly in regard to **traffic management and improved public transport connections to rail services at Polegate**, must be a priority.
- Clear support was expressed for **enhancing the Cuckoo Trail and general non-car based connectivity across Hailsham**, linking communities to one another and to the surrounding countryside.
- A strong preference for **promoting higher quality design** which protects and enhances Hailsham's built character has been expressed through consultation responses.
- **Improvements should be made to the town centre**, which are sympathetic to the historic fabric of the town, but which also provide greater employment opportunities alongside an enhanced retail offer including a higher proportion of independent shops, a larger market selling local produce and more national high-street retailers.⁸

Although not all of these are 'land-use planning policies', they do represent the community's manifesto for the area and are embedded in this Neighbourhood Plan through a combination of the vision, objectives, overarching principles for sustainable development, policies and supporting projects. These are captured in the remainder of the Neighbourhood Plan.

For the purposes of clarity, Neighbourhood Planning policies are shaded in orange coloured boxes. Supporting projects which present the wider aspirations of the community, and which include priorities for directing CIL monies, are shaded in blue coloured boxes.

⁸ Consultation undertaken by Hailsham Forward in 2013, which focused on the town centre, had similar findings.

“Cities have the capability of providing something for everybody, only because, and only when, they are created by everybody.”

Jane Jacobs

3. Hailsham Tomorrow



This section of the Neighbourhood Plan sets out the vision and objectives for the Plan area. It has been informed and tested through consultation and establishes the community's aspirations for the future of Hailsham. It is supplemented by a discussion of the overarching principles that will help guide sustainable development over the Plan period.

3.1: Vision

By 2028⁹ Hailsham will be recognised as a destination for leisure, shopping & culture. It will have embraced and harnessed its growth potential and benefitted from the necessary infrastructure to support and retain its strong sense of community, civic pride and social wellbeing. Hailsham will be established as a balanced, well-proportioned and prosperous town offering its residents a high quality of life.

The town centre will be an appealing and pleasant retail and leisure destination which attracts visitors from far and wide (many via public transport from rail services at Polegate) into the unique historic market town served by modern and desirable facilities and amenities. Growth will deliver excellent schooling choices and new further education opportunities, good medical provision and care services.

An improved core retail area will support a diverse mix of independent and national shops and businesses bringing with it strong employment prospects for the town. A network of enhanced and connected green spaces, centred around the cuckoo trail will support an active and healthy community. The wetlands remain an asset of recreation and well-being for the community of Hailsham. Together with improvements to pedestrian and cycling links across the town, Hailsham residents will benefit from a safe and healthier alternative to car-based travel.

Key features of the vision are:

- Making Hailsham an attractive destination for leisure, shopping & culture
- Creating a connected and expanded mixed retail area
- Improved non-motorised transportation
- Connected green spaces for a healthy community

⁹ The timeframe is aligned with the emerging Local Plan.

3.2: Objectives

The objectives following from the vision are:

1. Development delivers the necessary facilities and infrastructure in accessible locations for existing and new communities alike.
2. Existing pedestrian and cycling routes are preserved and enhanced. The Cuckoo Trail will be improved as a multi-functional route for tourism, travel and recreation, further linking Hailsham to its surrounding communities.
3. New developments will create well connected, attractive cycling and pedestrian routes, providing seamless integration with the existing urban areas and public green spaces to encourage a reduction in car based travel.
4. Existing habitats and green infrastructure networks are protected and enhanced through sensitive development to encourage local habitat improvement and creation.
5. The character and setting of Hailsham's conservation area, statutory listed buildings and locally listed buildings are protected by fostering a high-quality design approach which promotes design innovation and reinforces the distinct local character areas of Hailsham.
6. Improve local air quality and provide reductions in carbon emissions by supporting local renewable energy generation.
7. Encourage the appropriate re-development of previously developed land to help meet housing need and encourage the regeneration of Hailsham Town Centre.
8. Protect and encourage the development of retail and commercial spaces which meet identified local need, to support new and existing small businesses and local retailers whilst also attracting inward investment into Hailsham.
9. Support existing retailers in Hailsham and encourage a diversification of the retail and leisure offers in the town to attract new shoppers and visitors.

The policies, and projects, within this Neighbourhood Plan intend to deliver on these objectives.

The next section of the Neighbourhood Plan outlines a set of overarching principles which have been developed to respond to the key issues identified from the community engagement and consultation and will form an important role in the delivery of the vision.

3.3.: Overarching Principles

Making Hailsham a great place:

This Neighbourhood Plan is forward looking. It embodies the principles of sustainable development and it seeks to direct and shape growth and change such that it enhances quality of life and place for current and future generations: such that Hailsham becomes a really great place. This means looking at the way the town as a whole works and learning from development that has and has not worked well in Hailsham.

The benefits of ‘great places’ are illustrated in Figure 3. It is clear that accessibility (for all people, of all ages, incomes and abilities), provision of a wide range of services and activities, and proximity to these and other people, as well as good design and a mix of uses, is central to the creation of successful places.

The Neighbourhood Plan has been influenced by sustainability credentials established through LEED¹⁰, particularly those within the Neighbourhood Pattern and Design section of the ‘Neighborhood Development’ (ND) reference guide¹¹, which is intended to help inform well planned development and approaches to the design and layout of new places as well as the regeneration of areas. Although originating in the US, LEED is recognised globally as the standard to adhere to when seeking to demonstrate resource efficient development and creation of sustainable places. The ND reference guide emphasises, amongst other items, the importance of walking and cycle friendly places, good public transport provision and mixed-use development with the provision of community facilities which integrate well within neighbourhoods.



Figure 3: The benefits of a great place¹²

¹⁰ LEED, standing for Leadership in Environmental and Energy Design, is a certification programme developed by the US Green Building Council (USGBC). The Neighborhood Development rating system was developed in conjunction with The Congress for New Urbanism and the Natural Resources Defense Council.

¹¹ USGBC et al, LEED 2009 for neighborhood development with global alternative compliance paths, Updated October 2010

¹² Graphic sourced and adapted from the PPS Group. See: <https://www.pps.org/a-thriving-future-of-places-placemaking-as-the-new-urban-agenda/>

Hailsham; The ten-minute town:

Hailsham is a relatively compact town. All everyday uses are within a five to ten-minute walk, cycle, or bus journey of the home. But current infrastructure provision does not support travel by these modes. The design of roads and streets is unbalanced and weighed heavily in favour of travel by car. The town currently suffers from traffic problems. If the status-quo is maintained this will only worsen as more development comes forward. Through growth, development and change over the next twenty years and beyond, it is important that this changes.

A key aspiration is for Hailsham to truly be the ‘ten-minute’ town (Figure 4), where people of all ages and abilities can easily access the services they need, including schools, healthcare, shops, leisure and cultural activities. But more than this, the town should change and develop in such a way that social networks are strengthened, that people can easily meet their friends and family, that the mix of housing provides for cohesive communities, and that people can work close to home.



Figure 4: The ten-minute town

Re-balancing movement and land-use planning:

To help move in this direction it is important to re-think the quality of streets and spaces in the town. The town is relatively flat and suitable for cycling, but cycling provision, beyond the Cuckoo Trail, is limited. New routes and connections are needed, that provide for direct links between the places people want to travel to and which, more importantly, are safe. Space for cycling should be made available on the main routes in and around the town, and safe crossings provided at junctions to avoid conflicts between vehicles and cyclists.

Walking and cycling can and should be the default choice for moving around in Hailsham. It is an aspiration that short trips, by foot and by bike, will become more common. This is good for the environment, for health and social well-being¹³, and for the economy¹⁴. For longer distances, or for those who struggle to walk or cycle, then bus services should provide an attractive proposition. This means providing frequent services and good waiting facilities, coupled with junction priority and good quality vehicles, providing both comfort and the ability to use Wi-Fi. Travel by foot, by bike or by bus should be a delight. Good public transport supports a good walking and cycling network and should form the backbone of the movement strategy for the town.

But this needs to go hand-in-hand with changes to the way we currently use the car. The cycle of car dependency (Figure 5) needs breaking. Providing more road space and plentiful car parking simply encourages demand, creating additional traffic and supporting the growth of lower density development that is dependent on car movement. Whilst it is accepted that people will continue to travel by car, the Neighbourhood Plan aims to create the conditions that encourage safe, attractive and efficient travel by alternative modes, and which provide people with the choice and opportunity to travel by foot, bike or public transport: a choice that doesn't fully exist at the moment. Indeed, providing for good walking and cycling conditions, and improved public transport services, helps reduce congestion¹⁵ and carbon emissions from vehicles, bringing environmental benefits.

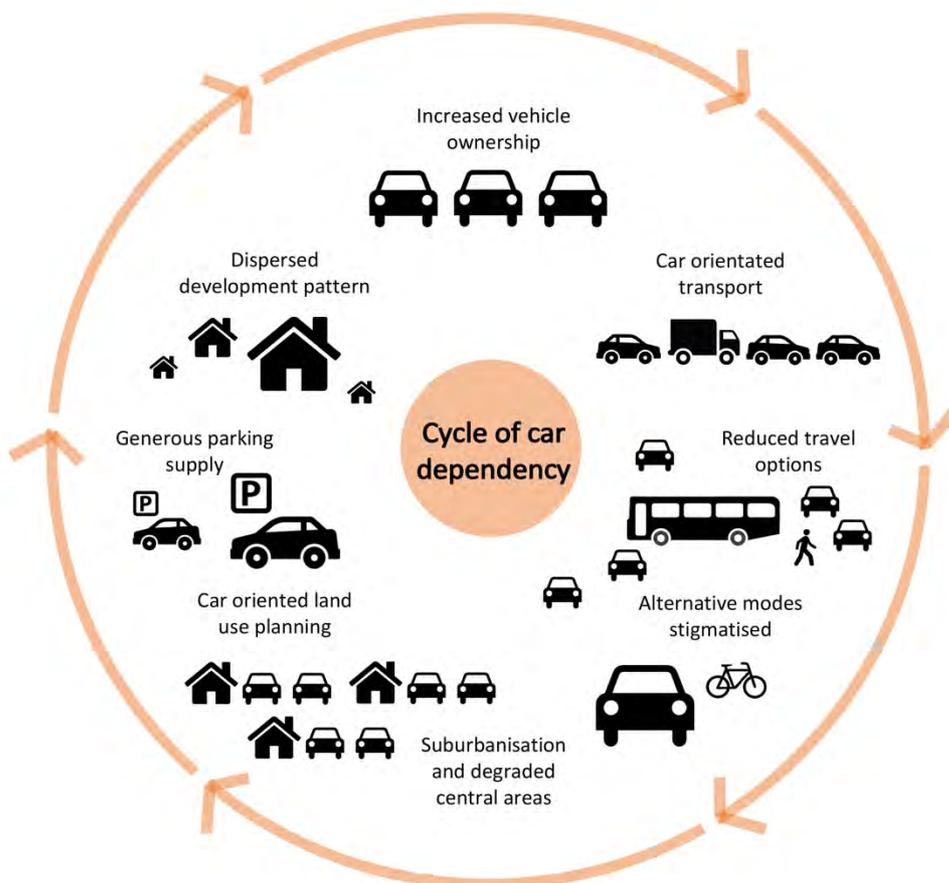


Figure 5: The cycle of car dependency

¹³ See for example the Healthy Streets Initiative developed by Living Streets with Transport for London.

<https://www.livingstreets.org.uk/what-you-can-do/blog/healthy-streets-are-cycling-and-walking-streets>

¹⁴ See for example the Health Economic Assessment Tool (HEAT) developed by the World Health Organisation (Europe) which is designed to help conduct an economic assessment of the health benefits of walking or cycling by estimating the value of reduced mortality that results from specified amounts of walking or cycling <http://www.heatwalkingcycling.org>. Also see, London School of Economics, The British Cycling Economy; Gross Cycling Product, 2011 <http://eprints.lse.ac.uk/38063/>

¹⁵ See research by Civitas for the European Union: <http://h2020-flow.eu/news/news-detail/how-walking-and-cycling-reduce-congestion-flow-quick-facts-published/>

For Hailsham, land use and transport decisions must be aligned, so that new growth knits into the existing urban fabric and which provides the conditions for walking and cycling. Streets should be redesigned to recognise that they are places too, that they comprise the majority of public space in the town and should therefore provide opportunities for people to meet, sit and enjoy. Equally, smarter approaches to parking should be made over time, with less surface car parking in the centre, providing scope for new shops and homes, public spaces and civic facilities.

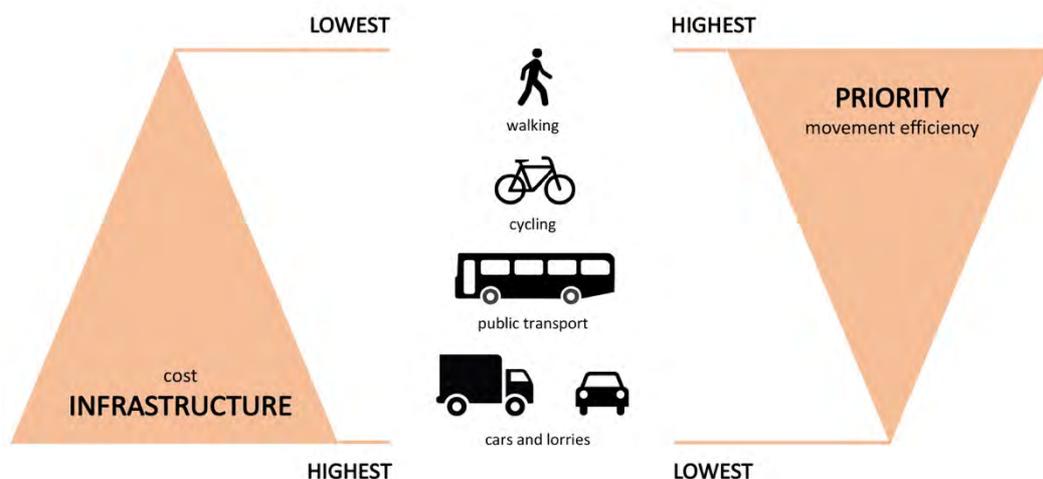


Figure 6: Reprioritising transport modes and investment

So, in Hailsham, we want to see real, attractive transport choices for all. Everybody will be able to get around, safely and enjoyably, by foot and by bike, and have access to frequent, fast and reliable public transport services. Sustainable modes of travel and investment in these will be prioritised (Figure 6).

Putting good design at the heart of change and development:

Good design has a major role in contributing to the quality of life and creating attractive, liveable places. Good design goes beyond the look of buildings and considers: the mix of uses and activities that help create lively and interesting places; the local character and distinctiveness of a place, reflected through its landscape and building materials for example; contributing to healthy lifestyles by making it easy for people to move by foot and by bike; fostering a sense of community through well designed, functional and attractive public spaces; and enhancing the quality of environment.

In short, good design will help create high quality, safe and successful places in Hailsham where people enjoy living, working and visiting. Successful places are those¹⁶:

- Having a complementary mix of uses and activities.
- Being fit for purpose, accommodating uses well.
- Encouraging easy movement.
- Including successful public space.
- Being able to adapt to changing needs and circumstances.
- Being efficient in how land and other resources are used.
- Having an appearance that is appealing and appreciated.
- Having a distinctive, positive identity and sense of place.

¹⁶ Source: The Design Companion for Planning and Placemaking, Transport for London (Urban Design London), 2017. This document supports and extends national Planning Practice Guidance and is intended for use by all those involved in the planning and placemaking process to help secure higher standards of urban design and the delivery of better practice.

Hailsham should be an attractive place in which to live, work and visit, where it is easy to move around, where uses and facilities are within easy reach of the home, and where there is a strong sense of community supported by a wide mix and choice of housing.

Complete neighbourhoods:

Neighbourhoods are only 'complete' when they include the full range of supporting uses and facilities, including, for example, schools, healthcare, parks and place spaces. Provision of such uses is important to quality of life, of helping to create a sense of community and belonging. Areas lacking such facilities, or where they are poorly designed, are unwelcoming or inaccessible, can have long-term financial and social costs. Providing them in a timely manner, and where they are well integrated with development, is important to good planning.

During the consultation undertaken for this Neighbourhood Plan, respondents highlighted the importance of providing these uses. Policies in this Plan include a requirement for new areas of growth and development to provide such uses. As the Wealden Local Plan is further refined, the associated Infrastructure Delivery Plan will scope out the detailed infrastructure requirements for Hailsham in liaison with infrastructure providers, the costs and timing of delivery.

Habitat Regulations

Located close to the south and east of Hailsham is the Pevensey Levels SSSI, Ramsar Site and Special Area of Conservation. Further afield are the Lewes Downs Special Area of Conservation and the Ashdown Forest Special Area of Conservation and Special Protection Area. All are sensitive environments. The Conservation of Habitats and Species Regulations 2017, known as the Habitat Regulations, requires the consideration of the likely significant effect of development on areas such as these¹⁷ and, if necessary, an appropriate assessment. For development in and around Hailsham to be considered acceptable, the competent authority must undertake a full Habitat Regulation Assessment which concludes that the proposal does not have a likely significant effect or that an appropriate assessment shows it will not adversely affect the integrity of the site.

(Note: see policy overleaf)

¹⁷ These regulations do not apply to the SSSI

Policy HAIL HRA1: Habitat Regulations

Development either supported or proposed by policies or projects contained within the Hailsham Neighbourhood Plan, or any other development that may come forward in the Neighbourhood Plan area, may only be permitted if it can be concluded that the proposals, either alone or in combination with other plans or projects, will not adversely affect the integrity of Ashdown Forest Special Area of Conservation, Lewes Downs Special Area of Conservation or Pevensey Levels Special Area of Conservation and Ramsar.

Any proposals for development must be accompanied by information to allow the competent authority to complete a full Habitat Regulations Assessment of the impacts of the development.

In relation to Pevensey Levels SAC and Ramsar site development may only be permitted where there is sufficient capacity at the relevant Waste Water Treatment Works or an alternative foul water drainage solution. Where impermeable surfaces are proposed within the hydrological catchment area then mitigation, such as sustainable drainage systems, will be required to control the quality and volume of surface water run-off to a level that will avoid an adverse effect on the integrity of the SAC and Ramsar when considered both alone and in combination with other Plans or projects.

In regards to Ashdown Forest SAC and Lewes Downs SAC, development that results in the net increase in traffic movements across roads adjacent to these SACs will only be permitted subject to providing a financial contribution towards a package of measures designed to ensure that there is no adverse impact on the integrity of the sites. Development may only be delivered when suitable mitigation measures are identified and a delivery mechanism created by the Local Planning Authority, is in place. In addition, all new development must also provide:

- Appropriate electric vehicle charging infrastructure. The type and amount of infrastructure to be agreed with the competent authority to suitably mitigate the type of development;
- Demonstrate that freight traffic resulting from new development will seek not to impact the Special Area of Conservation through routing arrangements and travel plans;
- Provide personalised travel planning; and
- All new housing and employment development to have the ability to connect to high speed broadband.

The vision, objectives and overarching principles outlined in this section of the Plan frame the policies which follow.

POLICY SECTION A: NEIGHBOURHOOD PLAN AREA-WIDE POLICIES

This section of the Neighbourhood Plan presents policies that apply across the town and Parish as a whole. They relate to:

- Design quality
- Active travel
- Green space and biodiversity
- Employment
- Community facilities
- Tourism
- Air quality and renewable energy generation

*“Some men see things the way they are and ask
Why?
I dream things that never were and ask
Why Not?”*

George Bernard Shaw

4. Design quality



4.1: High quality design and local distinctiveness

The achievement of high quality design is a core principle of the NPPF. It states, at paragraph 124, that *'good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities'*. The importance of design of the built environment and its contribution to making better places for people is emphasised. It goes on to note that *'Neighbourhood Plans can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development'* (paragraph 125).

Hailsham has grown over time, with the historic core gradually being surrounded by newer residential and commercial development. Initially, the growth of the town responded to its location and cultural heritage, the surrounding landscape and built form, and with the use of traditional materials that reflected the geology of the wider area. These elements help shape the character of the built form.

Local characteristics should be identified through site analysis plans prepared as part of any planning application or development framework, and be used to frame a positive place-based response. Positive features that should be referred to are outlined in the Hailsham Character Area Assessment¹⁸. These include:

- Mix of local materials and combinations of these in older developments (and some newer examples), creating diversity and interest (see Figure 7).
- Fine grain, human scale buildings within the historic core of the town, which allow for flexibility of use.
- Well-proportioned residential areas successfully integrating green space, landscaping and vegetation, as well as residential buildings set-back from the highway which provide both a sense of openness and privacy.

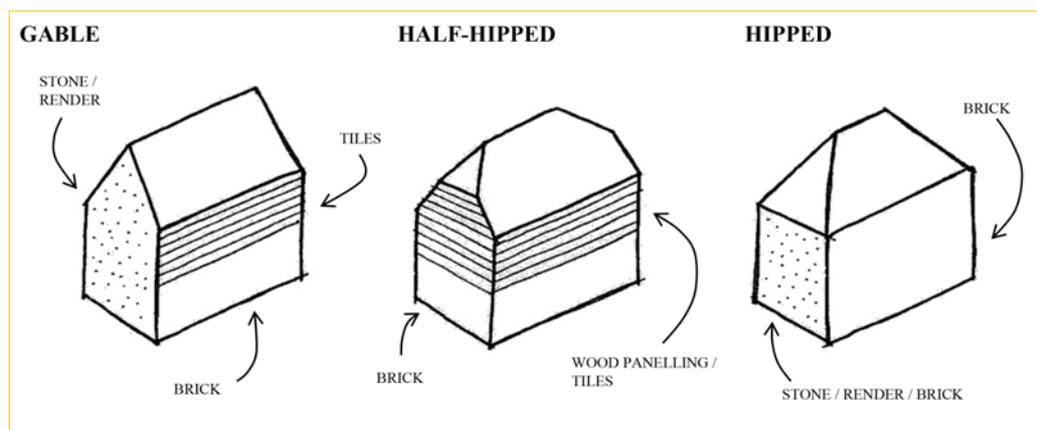


Figure 7: Diagram illustrating the combination of building materials and roof-types common in Hailsham

¹⁸ Hailsham Character Area Assessment, prepared on behalf of Hailsham Town Council, July 2017

Equally, aspects of the built form that detract from the quality of place in Hailsham have been identified. Such approaches to development should be avoided in the future. They include:

- Narrow street widths and front gardens in newer developments, with a lack of privacy and greenery.
- Vehicle dominated layouts with left over green spaces that have limited use and function.
- Poorly arranged parking, particularly in residential areas, that is not used in the way it was intended and results in people parking on the pavement.
- A lack of diversity and appearance of modern house types and limited use of materials.
- Poorly designed and equipped playing spaces in newer developments.
- Presence of blank gable ends fronting the street.
- Areas of surface parking which undermine the historic urban fabric of the town centre.

A design-led response to development, referencing good practice principles¹⁹, will help create successful places. Where new development is proposed in Hailsham it should be of a high-quality, irrespective of scale or use (Figure 8).



Figure 8: Example images of high quality new housing

¹⁹ See, for example:

Building for Life, Built for Life, 2015 <http://www.builtforlifehomes.org/go/building-for-life-12>;

The Design Companion for Planning and Placemaking, Transport for London (Urban Design London), 2017; (continued overleaf)
Manual for Streets, Department for Transport and Department for Communities and Local Government, 2007

<https://www.gov.uk/government/publications/manual-for-streets>;

Manual for Streets 2, Department for Transport, 2010, <https://www.gov.uk/government/publications/manual-for-streets-2>

Global Street Design Guide, Global Designing Cities Initiative with the National Association of City Transportation Officials, 2016,
<https://globaldesigningcities.org/publication/global-street-design-guide/>

Policy HAIL D1: High Quality Design

All new development in Hailsham should contribute to the creation of high quality places through a design-led approach underpinned by good design principles and reflecting a thorough site appraisal. All buildings, spaces and the public realm should be well-designed and display a high level of architectural quality which responds positively to local context.

Proposals for new development should seek to optimise the capacity of the site by responding appropriately to the scale, character, materials, grain and architectural rhythm of the existing built form. Proposals should also demonstrate how they respond to the landscape, local and longer-views, the environment and historic assets. Design that incorporates opportunities to enhance biodiversity, including green walls, roofs and SUDs, are encouraged.

Development should integrate well with existing neighbourhoods, positively contributing to the public realm and street environment, creating well connected, accessible and safe places. Development should provide for a rich movement network and choice of routes.

All development within residential and mixed-use areas, including town and local centres, should have active frontages, particularly at street level, and provide a clear distinction between areas of public and private realm.

Proposals for new development should demonstrate how they respond to and enhance the amenity value of an area through consideration of matters such as overlooking, natural light, micro-climate, outlook and amenity space. Proposals for new residential development are encouraged to meet the nationally described space standards²⁰ and the necessary dwelling mix, privacy, daylight and sunlight for future occupiers wherever appropriate.

New buildings should be designed with flexibility and adaptability in mind, so that they can respond to changing social, environmental, economic and technological needs. New development should be designed such that it does not prejudice future development or design of adjoining sites.

In residential neighbourhoods and mixed-use areas, the townscape impacts of any large floorplate developments should be minimised through incorporation of finer grain frontages that wrap around the larger unit. This approach also applies to large surface and multi-storey car parks as well as any servicing areas. Wrapping the larger unit with development should allow for a mix of complementary activities.

Applications for major developments are encouraged to demonstrate how they respond to best practice through submission of a Building for Life 12 assessment (or a later equivalent). Reference to the Wealden Design Guide SPD (or any later equivalent) and the Hailsham Character Area Assessment should also be made.

Planning permission will not be granted for development of a poor design that does not respond to the opportunities for improving local character and quality.

²⁰ Department for Communities and Local Government, Technical Housing Standards – nationally described space standards, March 2015 (Updated May 2016)

4.2: Small scale development

Many of the development sites that come forward in Hailsham over the Plan period are likely to comprise smaller sites and infill developments within the existing built-up area. Equally, existing properties will continue to be extended and modified. This type of development also impacts on the quality of place and local amenity. Applications for such development in Hailsham should demonstrate how they respond to the local context and do not unduly impact upon neighbouring amenity. The Wealden Design Guide SPD (November 2008) outlines acceptable approaches to residential extensions and should be considered when preparing and determining planning applications.

Policy HAIL D2: Small scale residential development and householder extensions

Applications for small-scale and infill development involving the reuse and redevelopment of previously developed land within the built-up area of Hailsham (as defined in the adopted Core Strategy or as redrawn in the new Local Plan, when adopted) are welcomed.

Applications will be supported subject to the following criteria being met:

- It is demonstrated that the proposed development is in keeping with the character of the existing built form (including the historic environment), expressed through density, scale, height, massing, materials and frontages.
- The proposed development does not result in an adverse impact on residential amenity of the area, particularly in terms of noise, privacy, overshadowing and access to natural daylight.
- The proposed development does not result in the loss of local amenity green space, nor adversely impact on biodiversity.
- The proposed development is directly accessible from the adopted highway and incorporates pedestrian access.

Proposals for small scale development, including extensions to existing buildings, must be of a high standard of design, responding to or improving the site and surrounding area. All applications should refer to the guidance in the Wealden Design Guide SPD (or any later equivalent) and the recommendations in the Hailsham Character Area Assessment.

4.3: Innovation and variety

Innovative design, that raises the standard of design in Hailsham, but which also promotes and reinforces local distinctiveness, is welcome. Contemporary design approaches may be acceptable where it responds positively to context.

Policy HAIL D3: Innovation and Variety

Development proposals that establish bespoke design solutions and residential typologies as opposed to application of standard 'off-the-shelf' housing types and layouts are actively encouraged.

Schemes that respond to and reinterpret local design cues, including those outlined in the Hailsham Character Area Assessment, and which demonstrate an imaginative sense of place whilst respecting the surrounding context are welcomed.

Applicants are encouraged to run design competitions to generate a high quality architectural response to building design and layout.

4.4: Self and Custom-build housing

The Neighbourhood Plan encourages self and custom-build housing in appropriate locations across the Parish. Where areas of land are identified for self-build, either as part of a major development or through other smaller scale or windfall development, good design principles will apply.

Masterplans and plot passports should be prepared that provide the parameters within which these new homes can be designed and built, allowing for individual interpretation but within a framework that establishes the grain, scale and rhythm of new development.

Plot Passports (see example extract in Figure 9) are a summary of the design parameters for any given plot, helping private homebuilders understand what they are allowed to build on the plot. They capture key information from the planning permission for the site, design constraints and procedural requirements. The passports clearly show permissible building lines within which the new dwelling can be built as well as height restrictions and other details such as parking requirements. Aspects such as materials, roof styles and fenestration are usually left for the plot owner to decide.

Policy HAIL D4: Design for self and custom build homes

Where land is proposed for self or custom house building a site masterplan and individual plot passports should be prepared and submitted for approval. Together, these will regulate the form of development, establishing building parameters such as heights, footprints, set-backs, densities and parking requirements.

The requirement for regulating plans and plot passports applies where sites are capable of accommodating ten or more self or custom build homes.

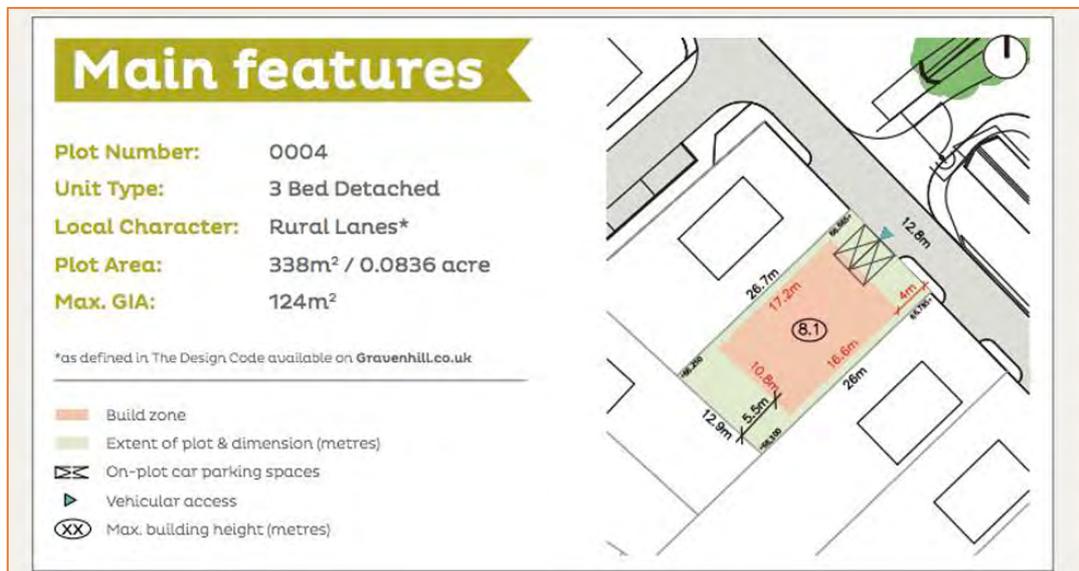


Figure 9: Example extract from a site regulating plan and associated plot passport²¹

²¹ Example extract from Graven Hill self-build scheme, source: http://righttobuildtoolkit.org.uk/csbt_location/exact-match/#

4.5: Parking in residential areas

The quality and provision of car parking can be a major determinant on the quality of place, particularly in residential areas. If it is not provided in the right place, it is unlikely to be used properly. The location and provision of parking should respond to good urban design and placemaking principles²², with on-plot and on-street parking provided in close proximity to the home. Rear courtyards should be avoided.

Where parking is provided on-street, consideration should be given to using different materials to define the use of different areas. Where possible, unallocated on-street parking provision, which is more land-efficient than parking courts, should be provided. Applications for proposals in areas of new growth are encouraged to present a street hierarchy and cross sections as part of the pack of submission material, demonstrating how parking will be provided on street. Robust street widths that allow for on-street parking but which also incorporate street trees and landscaping, and are designed to reduce speed in residential areas, will be viewed favourably (see example Figure 10). Parking standards published by East Sussex County Council should also be referred to²³.

Policy HAIL D5: Residential Car Parking Design

Parking within new residential development will be designed such that it is conveniently located and overlooked so that it can be used in the way it is intended for, avoiding informal parking that undermines the quality of the street environment. Parking should be unobtrusive, with garages (where proposed) set back from the building line and street trees used to soften the visual impact of parked cars, particularly on street. Proposals for rear or separate parking courts will not be permitted, unless alternative provision is impracticable.

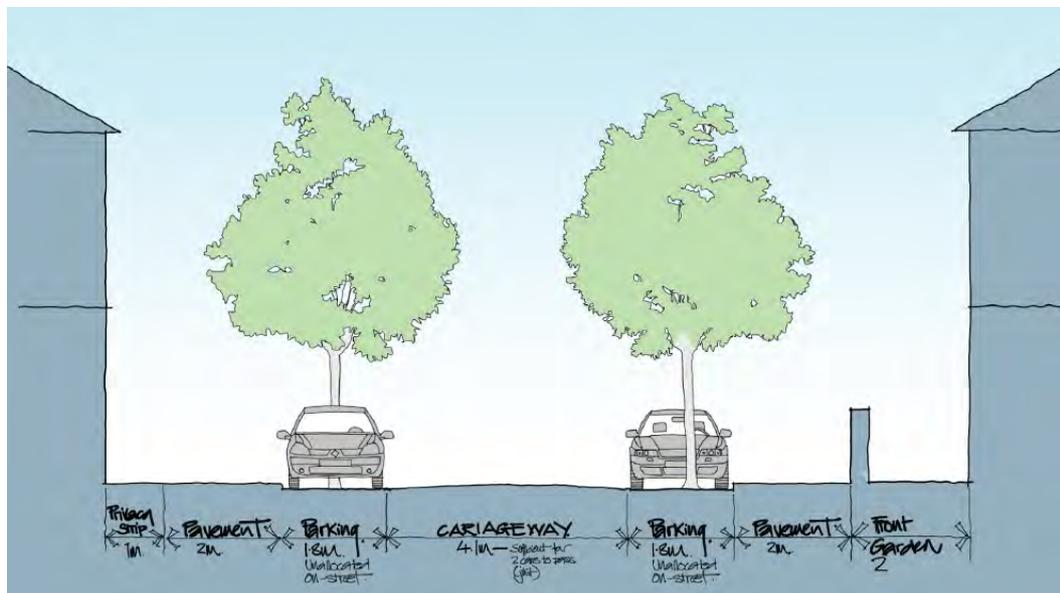


Figure 10: Example cross section through a robust, landscaped street type providing for on-street parking²⁴

²² See online resource: <http://www.spacetopark.org> and associated report: URBED, University of Edinburgh and Design for Homes, Space to Park, 2013

²³ East Sussex County Council, <https://www.eastsussex.gov.uk/environment/planning/applications/developmentcontrol/tdc-planning-apps/>, accessed February 2018

²⁴ Source: URBED, University of Edinburgh and Design for Homes, Space to Park, 2013

4.6: Design Review

The NPPF states (at paragraph 129) that Local Planning Authorities should have access to and make use of tools and processes to assess and improve the design quality of development, including design review arrangements. Design review is a way of assessing the design quality of new developments by an independent panel of experts to help support high standards of design. Guidance on the Design Review process can be found via the Design Council Cabe²⁵ and Design South East²⁶ websites.

In Hailsham, it is envisaged that, in the future, all major applications for development, as well as smaller schemes in sensitive or important locations, should be subject to design review. Schemes subject to review will include residential, commercial and mixed-use development proposals, infrastructure, community facilities, public realm and open space proposals. Design review should take place at the pre-application stage to help inform the design process and again following submission of the application, to help inform officer recommendations. The final proposals submitted should show how comments made during the design review have influenced the proposed development.

Aspiration HAIL D1: Design Review

Emerging schemes for major development, including proposals for any potential growth on the edge of the built-up area, should be assessed through design review. Design review of smaller schemes is also encouraged, including those in sensitive or important locations, such as the town centre and conservation areas.

It is envisaged that schemes will be referred to the Design Review Panel operated by Design South East (until such time as Wealden runs and operates a Design Review Panel). It is encouraged that design review takes place early in the process to allow scope for input into the emerging design. The final scheme submitted to the Council should include a report on the design review process and how the scheme has responded to this. Design Review of live applications is also encouraged.

²⁵ Design Council Cabe, Design Review: <http://www.designcouncil.org.uk/what-we-do/cabe-design-review>

²⁶ Design Review through Design South East: <https://www.designsoutheast.org/about-design-review/>

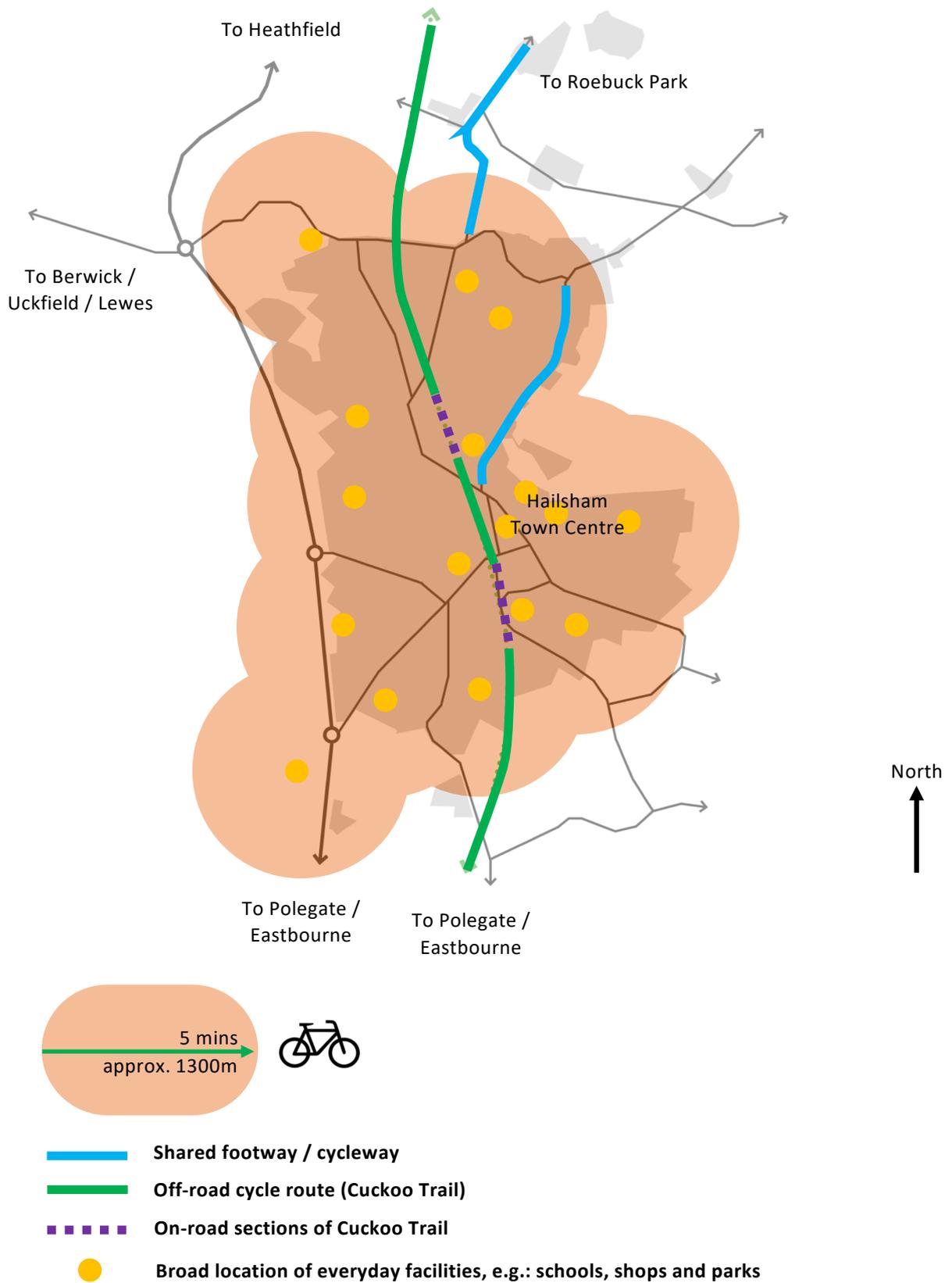


Figure 11: Existing cycle provision and broad travel distances around everyday facilities in Hailsham

5. Promoting active, smarter and sustainable travel



5.1: Walking and cycling

Consultation responses showed a desire to improve walking and cycling conditions, and associated facilities, in and around the Neighbourhood Plan area, providing travel choice and opportunity for all, irrespective of age or ability. There are significant social, economic, health and environmental benefits to be gained through a ‘modal shift’ from private vehicles to walking and cycling.

Although Hailsham is relatively compact and facilities and services are within a reasonable cycle distance of the home, cycle infrastructure in the town is limited (see Figure 11). The Cuckoo Trail is an excellent asset for the town, but more could be made of this: it is in some places, disconnected, requiring users to divert onto surrounding roads and residential streets, connections to the Trail are limited, there is limited lighting, and it lacks a main arrival point in the town centre: instead, users are mixed with the vehicle dominated environment around South Road and Station Road, which comprises one of the most congested parts of the highway network in Hailsham. Elsewhere, there are some limited cycle paths on main roads and advanced cycle stop lines at junctions around the town centre. The network does not comprise an attractive proposition for travel by bike.

Equally, some pedestrian routes and the quality of the public realm has been an afterthought. Many routes, particularly into the town centre, are discontinuous and unwelcoming. In short, all walking routes should reflect the ‘Five Cs’²⁷:

- *Connected*: good pedestrian routes which link the places where people want to go, and form a network
- *Convenient*: direct routes following desire lines, with easy-to-use crossings
- *Comfortable*: good quality footways, with adequate widths and without obstructions
- *Convivial*: attractive well-lit and safe, and with variety along the route
- *Conspicuous*: legible routes easy to find and follow, with surface treatments and signs to guide pedestrians

The Government’s Cycling and Walking Investment Strategy²⁸, and the forthcoming East Sussex Walking and Cycling Strategy²⁹, which will include a Local Cycling and Walking Infrastructure Plan, point to the importance of and need for new infrastructure investment to support active travel.

New or improved walking and cycling infrastructure should reflect best practice principles, drawing on examples from The Netherlands and Denmark³⁰. Alongside provision of safe street conditions and junctions for walking and cycling is a need to increase the provision of cycle parking in Hailsham, particularly within the town centre. Safe and secure parking facilities should be accommodated within the public realm, though designed such that

²⁷ As first recommended by the Department for the Environment, Transport and the Regions, Encouraging Walking, 2000

²⁸ See: <https://www.gov.uk/government/publications/cycling-and-walking-investment-strategy>, accessed February 2018

²⁹ See: <https://www.eastsussex.gov.uk/roadsandtransport/localtransportplan/transportplans/>, accessed February 2018

³⁰ The London Cycling Design Standards (Transport for London, 2014, updated 2016) includes guidance and advice for delivery of cycle friendly infrastructure based upon best practice lessons learnt from cities in The Netherlands and Denmark amongst others. This should be used as a guide for delivering improved cycling conditions in Hailsham. The document is available via: <https://tfl.gov.uk/corporate/publications-and-reports/streets-toolkit>

provision responds positively to the character and quality of the built environment. Covered cycle parking is also encouraged, particularly within new commercial development, which should also provide shower and locker facilities for cyclists.

High quality walking and cycling routes should be integrated within new developments. But the quality and attractiveness of the network is only as good as the missing links or gaps in the routes. The Town Council thus proposes that CIL payments received from development are directed to an improved town wide walking and cycle network for the benefit of existing and new residents. Key routes for improvement are those that make short, everyday journeys easy and enjoyable. This includes improving links to parks, the town centre, schools, healthcare and other community facilities (see Appendix B).

Policy HAIL AT1: Active travel

All applications for development are encouraged to demonstrate how they support active travel through delivery of walking and cycling routes that reduce reliance on vehicular movement.

Where new walking and cycling routes are provided as part of new areas of development, they must be direct, safe and convenient to use. The layout of proposed new development should allow for the natural surveillance of routes through overlooking with active development frontages.

Proposals for new development are encouraged to demonstrate how they link into the existing footpath and cycle network, providing connections between residential, retail, leisure, commercial and community uses.

Proposals for commercial, leisure and community uses should support and enable active travel through inclusion of safe, secure and convenient cycle parking and changing facilities where appropriate.

Proposals for development that reduce the capacity or safety of existing active travel infrastructure, including footpath and pavement space, or which results in the removal of locally important facilities, will not be considered acceptable.

Policy HAIL AT2: The Cuckoo Trail

Proposals for development that enhance the quality of the Cuckoo Trail will be supported. Improvements may include:

- Incorporation of new links to and from the Cuckoo Trail for pedestrians and cyclists, integrating with an enhanced walking and cycle network across Hailsham.
- Creation of new active fronts within development along the route of the Cuckoo Trail which enhances safety and security through natural surveillance
- Provision of unobtrusive lighting along the Cuckoo Trail.
- Enhancing the environmental quality of the habitat, biodiversity and trees along the Cuckoo Trail.

Longer-term development opportunities that provide scope to reconnect missing links along the Cuckoo Trail, creating a seamless route, will be welcome.

5.2: Public transport

A good public transport network helps ensure access to jobs, health services, shopping and leisure facilities. For longer distances, beyond which people will normally walk or cycle, a good public transport provides a viable and sustainable alternative to the car. Public transport is also inclusive: it allows everyone, of all ages and abilities, to move around town.

Current public transport provision in Hailsham, taking the form of busses, is focused on the town centre and south west through the town to Polegate. Services are relatively infrequent and there are gaps in provision, particularly to the south east of Hailsham (see Figure 12). This area of Hailsham has amongst the highest proportion of households ranked as being within the indices of deprivation in the Neighbourhood Plan area³¹. It is in such areas that good public transport services are most needed. Equally, any potential future growth that might take place outside of the existing built-up area falls outside of the current catchments of good bus services.

During consultation, clear preference was expressed for improved non-car transport in Hailsham. In particular, improved public transport connections to Polegate railway station were mentioned as a key priority. The policies in this Plan encourage improved bus provision in Hailsham, with opportunities for new and extended routes being facilitated through future growth and development in Hailsham. Such provision will help fill the gaps in the current network.

A high-quality bus corridor between Hailsham and Polegate is currently being explored and promoted by Wealden District Council and East Sussex County Council³². The Town Council fully supports this and will continue to work with the District and County to deliver this. As part of such a route, the Town Council supports provision of a new Park and Ride site within Hailsham, which, subject to further assessment, would form part of a package of sustainable transport measures that aim to reduce the impact of car-based travel and associated congestion in the town centre.

Policy HAIL AT3: Public transport

Support will be given to proposals that:

- Help deliver improved public transport services through new or extended and more frequent routes.
- Incorporate high quality, attractive waiting facilities, including shelters that integrate live travel information.
- Help deliver and facilitate an express public transport connection to Polegate railway station.
- Are located in close proximity to public transport services and contribute towards improved connectivity to these.

Subject to need, proposals for major growth and development on the edge of Hailsham will be expected to accommodate routes for bus services, integrating with existing routes. Streets must be carefully designed to balance the needs of competing users and avoid conflicts between bus users, pedestrians and cyclists.

³¹ Source: 2011 Census

³² Provision of the Eastbourne/Hailsham Quality Bus Corridor was also promoted in the Wealden Core Strategy

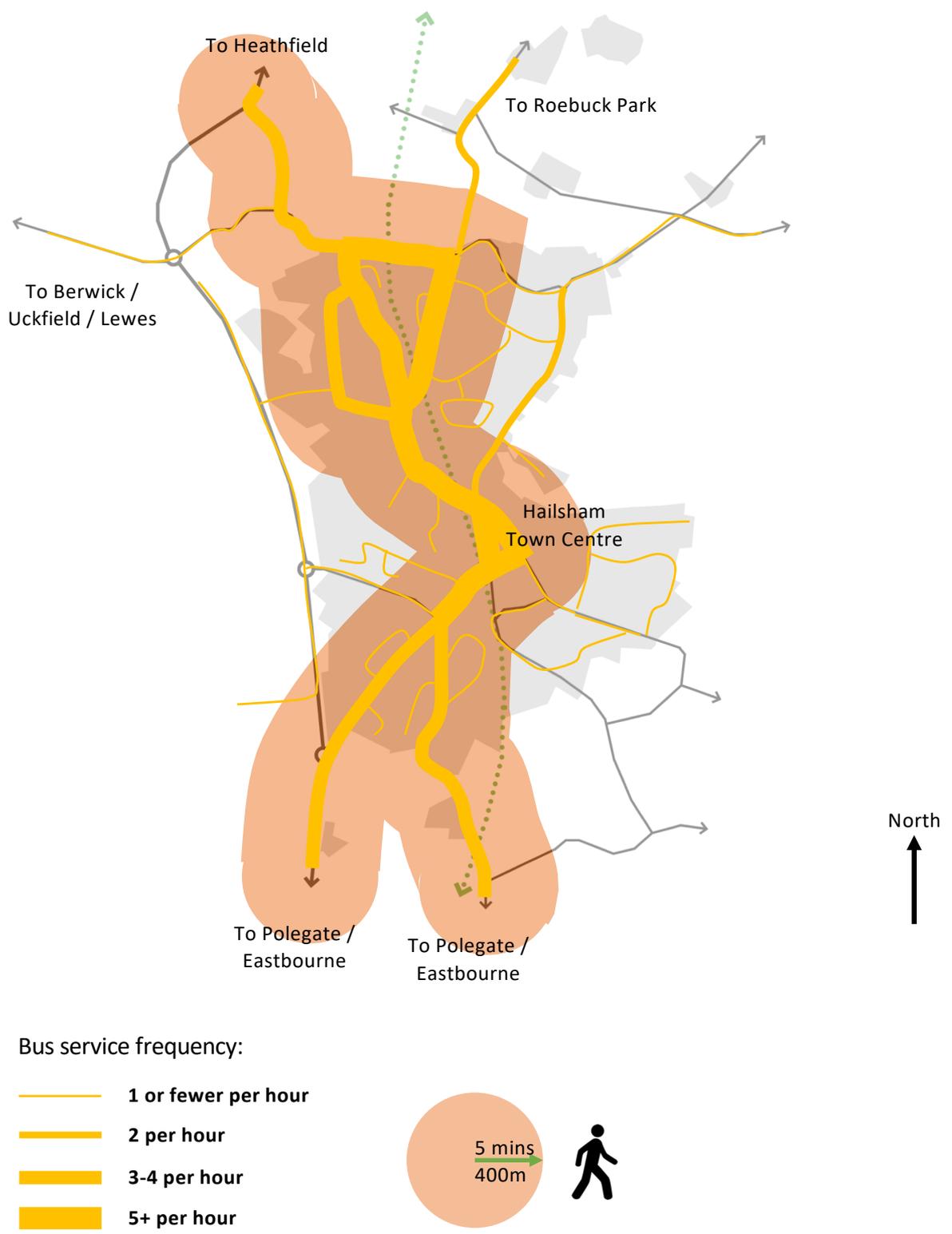


Figure 12: Existing bus route frequency and catchments in Hailsham

5.3: Projects

Through work on the Neighbourhood Plan a series of possible projects have been identified which the Town Council will continue to lobby for. Those related to active and sustainable travel measures are outlined in the shaded box below (Projects AT1).

As previously discussed, a priority project for the Town Council is delivery of a frequent, direct and high quality public transport connection between Hailsham Town Centre and Polegate railway station (see Figure 13). This should ideally link to Eastbourne as the nearest major town, providing an alternative and attractive means of travel to the retail offer, post-16 education and district hospital. The Town Council believes that this could potentially include a new Park and Ride facility, reducing the impact of vehicular traffic to and in Hailsham as well as on the strategic road corridors between the main towns. Delivery of this project, and all other projects identified, will involve ongoing discussion with the District and County Council, and with developers, through the planning application process, as well as with bus operators.

Public transport, walking and cycling should become attractive propositions for people to use. The quality of infrastructure, as well as routes and services, should be enhanced. This means, for example, wider and better pedestrian crossing facilities, improved street furniture and less street clutter, dedicated cycle lanes, comfortable and informative bus shelters.

The projects outlined also include opportunities for direction of funds payable to the Town Council through CIL.

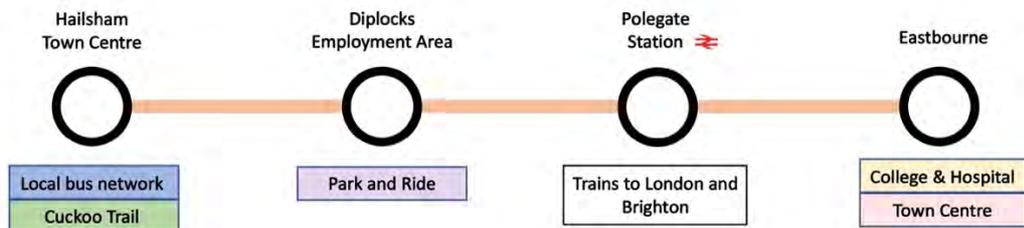


Figure 13: Concept idea for high quality bus route between Hailsham, Polegate and Eastbourne

Projects HAIL AT1: Active and sustainable travel projects

The Town Council will work closely with the District and County Councils to deliver a high-quality public transport service between Hailsham town centre, Polegate railway station and Eastbourne town centre. This should include feasibility work to investigate routing options. As part of such a route, the Town Council will lobby for a Park and Ride facility, subject to further assessments into the viability and feasibility of such a scheme. This will form part of the town-wide package of sustainable travel measures designed to increase accessibility for all and to relieve traffic and parking pressures on local streets. In addition, all bus stops across Hailsham should also be upgraded, to provide shelter and digital information. The Town Council will also support funding initiatives that support Community Transport services.

The Town Council will also look to develop a town-wide cycle strategy in association with the District and County Councils, providing safer routes and junctions and improved connectivity to local facilities and the Cuckoo Trail. The Town Council will liaise with East Sussex County Council in relation to the forthcoming Walking and Cycling Strategy.

Within the town centre, support is given to creation of a possible new ‘hub’ along the Cuckoo Trail, comprising a welcoming arrival point and including an integrated visitor centre, cycle facilities, café and toilet. Such a facility will continue to be explored by the Town Council.

Public rights of way across the town and linking with the surrounding countryside will be retained and improvements to the quality and maintenance of the route sought, including new wayfinding. The provision of missing links within the network will be investigated, including provision of a safe walking and cycling connection across the A22 to Abbots Wood.



Figure 14: Example image of rapid bus service

6. Enhancing green space and biodiversity value



6.1: Natural and amenity green space

Hailsham benefits from green open spaces both within and around the existing built-up area. But access to green space is limited in parts of Hailsham: accessible greenspace is concentrated in the southern part of the urban area with more limited access to natural greenspace in the north³³.

Any proposals for major growth in Hailsham, including those to the edge of the existing built-up area, will be required to provide green space as part of proposals in line with open space standards in the adopted Development Plan (and any new standards that will be adopted in the new Local Plan). Combined with good walking and cycling routes, linking with existing neighbourhoods, the potential for increasing access to green space exists.

Within the built-up area of Hailsham there is a relatively high degree of accessible amenity green space. However, the quality and use of the space varies: in some places play equipment is limited and in others the space represents no more than mown grass. This includes large areas of road side verges and open spaces that offer the local community little more than a setting for the buildings themselves. Such spaces are often known as 'space left over after planning'. It has a limited role or function. It is considered that spaces within Hailsham could be made to work much harder, increasing their use and biodiversity value. Green verges and other under-used area of public space could be transformed into wild flower meadows, community gardens and allotments. Some of these aspirations can be delivered as part of proposed new developments. Elsewhere, they represent projects which the Town Council will actively pursue.

The public rights of way network around Hailsham provides access to the surrounding landscape and these will need to be maintained and improved during the life of the neighbourhood plan.

Abbots Wood and the Pevensey Levels are the two highest quality and most important green spaces in the area. Abbots Wood is though difficult to access as cut off from Hailsham by the presence of the A22 which forms a barrier to movement, particularly for those who do not have access to a car. New or improved links to Abbots Wood are sought.

³³ Chris Blandford Associates, May 2017, Wealden Green Infrastructure Study

Policy HAIL GS1: Natural and amenity green space

Subject to other policies in the Neighbourhood Plan, support will be given to proposals for new development that:

- Create new wildlife habitats, connect, enhance and retain existing wildlife habitats.
- Provide opportunities for gardening, wildlife and food production within existing and new residential areas, including the utilisation of underused roadside verges for these purposes.
- Provide good quality outdoor space including private and community gardens, as well as contributing to the provision of new tree cover.
- Improve links between Hailsham and the surrounding landscape, upgrading the quality of the multifunctional landscape along these routes and strengthening connections with the Cuckoo Trail.
- Enhance the quality of public spaces and the streetscape within the built-up area, including new tree planting, landscaping and sustainable urban drainage.

Policy HAIL GS2: Open space within major development areas

Where appropriate, natural and amenity open space will be provided within all major development sites in Hailsham in line with guidance and standards contained in the Wealden District Council Open Space, Sports and Recreation Assessment 2016-2028, or any later and more up-to-date standards that might be adopted in the new Wealden Local Plan.

All green space will be designed such that is easily accessible from the proposed new development and well-integrated with new frontages overlooking the green space and providing a clear transition between the public and private realm.

Projects HAIL GS1: Natural and amenity green space

The Town Council will look to improve the quality of all existing amenity and natural green spaces across the Neighbourhood Plan area, including provision of well-equipped play space.

The Town Council will work with the District and County Council to explore how underused green spaces and roadside verges might be better used to increase biodiversity value, provide new wildlife habitats and space for local food production. Use of such space for community gardens is encouraged.

The delivery of safer access to Abbots Wood will be explored with the Highways Authority.

The Pevensey Levels is a highly sensitive location and afforded the highest levels of protection through the Ramsar convention and the EU Habitats Directive. Any future proposed growth and development around Hailsham will need to demonstrate that there are no adverse impacts on the integrity of the Pevensey Levels and build in appropriate mitigation measures where required, particularly in regard to hydrological impacts and biodiversity value.

Should proposals for development on the edge of the existing built-up area of Hailsham come forward then applicants will be required to consider how areas of landscaping and biodiversity might be provided such that they provide sustainable and managed areas of natural space between the proposed area of development and the Pevensey Levels, and do not increase recreational pressures on the SSSI. Existing Core Strategy policy WCS12 (Biodiversity) and draft emerging Local Plan policy EA1 (Biodiversity) should be responded to.

The Town Council would like to see conditions applied to the granting of any planning applications in these areas such that the natural spaces provided are protected in perpetuity and do not lead to any additional disturbances from increased access to the Pevensey Levels.

Given groundwater conditions in southern Wealden there may be occasions where both minor and major development proposals will need to consider and address flooding and drainage issues in detail. Advice on drainage requirements and potential strategies for incorporation within development has been prepared by East Sussex County Council³⁴. Applicants for development are encouraged to use this tool.

The Pevensey and Cuckmere Water Level Management Board should also be consulted in regard to discharge consents where proposed development will drain into the Pevensey Levels or River Cuckmere.

The Pevensey Levels and adjacent high ground are areas of high archaeological potential. This should be investigated and considered as part of any applications for development.

Policy HAIL GS3: Pevensey Levels

All applications for development adjacent to the Pevensey Levels will need to demonstrate that there are no detrimental impacts to the setting and quality of the Pevensey Levels. All applications will be subject to the Habitats Regulation Assessment.

Applications for any development adjacent to the Pevensey Levels will be required to provide green space along the non-built-up edge of the growth area, creating an area of natural green space to be protected for biodiversity and ecological purposes. They should comprise natural green space and incorporate SUDs, holding ponds and other natural drainage features as appropriate to the site. Such provision should not result in any additional recreational pressures on the SSSI.

³⁴ See: <https://www.eastsussex.gov.uk/environment/flooding/sustainable-drainage-systems/> accessed February 2018

7. Employment



Hailsham is an important employment centre with a range of jobs in manufacturing and services. However, the Wealden Revised Floor Space Calculations for Employment Land Provision Report (ELP), 2010, states that:

“There is still a need for an 'economic step change' across the District to support economic growth, particularly in the south, and to reduce levels of economic deprivation, improve wages and provide a range of employment opportunities.”

The Wealden Economy Study³⁵ suggests that a large proportion of the existing stock of premises for employment across the District is sub-optimal and will likely need to be replaced in the future. It goes on to recommend that good quality and affordable office space should be provided, providing opportunities for new businesses to set up as well as scope for individuals who currently commute out of the district to instead work from home or work for businesses locally.

Policy HAIL EMP1: Providing for a mix of employment opportunities

Opportunities that provide for local employment opportunities within the built-up area (as defined in the adopted Core Strategy or as redrawn in the new Local Plan, when adopted), including small scale social enterprises, small and medium size businesses, and live work units, are welcome, particularly where they reduce out-commuting.

Applications that diversify the business offer in the main employment areas (for B1, B2 and B8) uses are encouraged.

Opportunities to provide flexible employment space and support small and medium sized businesses in the town centre and existing employment areas will be welcomed

Applications for new business-related development should improve the quality of the environment and should accord with best practice design principles. New employment proposals will be subject to design, landscape and transport assessments.

The findings of the 2016 Hailsham residents survey³⁶ found that there is a need within Hailsham for new business start-up space and small business parks. Opportunities to increase the range and quality of jobs on offer and help develop work skills should be key priorities. Stimulating economic regeneration and investment is important to bring about a necessary step change for the local economy. The draft SELEP Creative Open Workspace Master Plan also encourages investment in and support for creative industries³⁷.

³⁵ Regeneris Consulting for Wealden District Council, Wealden Economy Study, December 2016, updated March 2018

³⁶ <http://www.hailsham-tc.gov.uk/wp-content/uploads/2015/07/HTC-Oct-2016-Newsletter-for-web.pdf>

³⁷ South East Local Enterprise Partnership (SELEP), September 2017, Draft South East Creative Economy Network; Towards a SELEP Creative Open Workspace Master Plan, http://www.southeastlep.com/images/uploads/resources/Item_9c_-_SECEN_creative_workspace_masterplan_v5.pdf accessed February 2018

Hailsham has a higher level of self-employed people compared to regional averages. Providing more start up business space could be a good opportunity to stimulate economic growth and to harness local entrepreneurial spirit. Provision of such uses, including opportunities for home working, can support the future sustainability of development, reduce commuting and car usage, and encourage business development.

8. Community facilities



The provision of infrastructure is critical to ensuring that local residents have access to essential services and facilities to maintain a high standard of living. In particular, provision of social and community facilities, including schools, healthcare, sports halls and community centres, which are well located and integrated with other local and town centre uses, will help contribute towards a sense of place and identity. Locating such uses in easy access of the home and co-located with other activities will help increase access and use by the whole community. These uses and facilities will help meet the needs of the growing community as well as benefiting existing local residents.

Whilst the provision of social and community infrastructure within any area of major new development should principally be focussed on addressing the needs of that development, they should also complement and, where possible, respond positively to the needs of existing communities upon whom development will impact. This will help strengthen community cohesion.

Policy HAIL CF1: Community facilities

Applications to enhance and provide additional community facilities will be supported. Community facilities for the purposes of this policy include education, healthcare, childcare facilities and community halls.

All facilities should be easily accessible to everyone, and provide for good walking and cycling connections, and where possible, be located close to public transport. Proposal for new development should provide for the appropriate level of parking provision and, where appropriate, be subject to a Transport Assessment.

Where social and community facilities are to be provided as part of any major mixed-use development proposal the planning application should be supported by a statement establishing the phasing and delivery of these uses. Wherever possible, new community uses should be delivered during the early phases of development to help build a sense of community and integration with existing surrounding communities.

Flexible multi-functional buildings that allow for the widest possible use and activity will be supported.

The loss of existing community buildings (Use Class D1) will be resisted unless it can be demonstrated that demand within the locality for the facility no longer exists or that suitable alternative provision is made elsewhere.

The capacity of remaining cemetery space in Hailsham is limited. It is estimated that the capacity will be used up within the next fifteen years. The Town Council intend to work closely with Wealden District Council to identify the most appropriate and effective strategy for providing additional capacity in the future. This will need to consider the necessary size and most suitable location for additional capacity, the needs for different types of burial and cremation, car parking and accessibility, and proximity to existing cemetery provision.

Projects HAIL CF1: Cemetery space

The Town Council will commence a review of the options to provide additional cemetery capacity in Hailsham and work with partner authorities to deliver this in the most effective way.

9. Tourism



Hailsham is a gateway to the South Down National Park. It also benefits from proximity to the Pevensey Levels, the Ashdown Forest to the north, Eastbourne and the coast to the south. Pevensey and Herstmonceux Castles are close by, and the Cuckoo Trail, which runs north south through Hailsham, forms part of the wider walking and cycle network connecting with the South Downs Way and High Weald Area of Outstanding Natural Beauty. Knockhatch Adventure Park, Arlington Stadium, Michelham Priory and the Observatory Science Centre in Herstmonceux are also within reach of Hailsham. Within the town itself, the interactive Hailsham Heritage Trail offers an insight into the town's rich and eventful history. Despite the presence of these assets and attractions the town is not fulfilling its potential, with the full economic benefits of the tourism industry and day-trippers not being captured.

Applications for uses and interventions that seek to strengthen the role of Hailsham as a centre for the tourism industry are welcome. This includes promoting leisure and cultural uses within the town, strengthening the retail offer, and enhancing the quality of the public realm and visitor experience. Equally, opportunities that strengthen the presence of the Cuckoo Trail and its integration with the town and, in particular, the town centre, are sought.

Alongside this, and as part of a Place Branding strategy (See Town Centre section), the potential for maximising the economic benefit of tourism and attracting inward investment in this sector will be explored.

Policy HAIL TOU1: Tourism

Sustainable development that improves the quality and diversity of existing tourist facilities, attractions, accommodation and infrastructure, including green infrastructure, will be viewed favourably. Applicants for new development will be required to demonstrate that:

- the siting, scale and design has strong regard to the local character, historic and natural assets of the surrounding area; and
- the design and materials are in keeping with the local style and reinforce local distinctiveness and a strong sense of place.

The loss of tourist facilities to other uses will not be permitted unless:

- it can be demonstrated that the tourist facility is no longer viable, having being actively marketed for a period of twelve months; or
- the proposed alternative use would provide equal or greater benefits for the local economy and community.

Where appropriate, proposals for development will be subject to design, landscape and transport assessments.

Long-term measures to encourage sustainable travel, environmental stewardship and overall good site management will be required.

10. Air quality and renewables



Through consultation concern was expressed with regard to air quality in Hailsham³⁸. Poor air quality can cause both short-term and long-term effects on health and many people are concerned about pollution in the air that they breathe³⁹. In Hailsham, rates of reported asthma and respiratory problems are, on average, higher than those recorded for East Sussex as a whole⁴⁰.

Improving air quality is a national concern⁴¹. To help combat worsening air quality this Neighbourhood Plan promotes a package of sustainable travel measures as well as the concept of walkable neighbourhoods, with infrastructure and facilities provided close to the home, and a mix of uses and activities in the town centre. With walking, cycling and public transport promoted as a viable and attractive proposition to the car, the impact of vehicle emissions will begin to be minimised. This goes hand-in-hand with landscaping and the promotion of new street trees and an increased tree canopy across Hailsham.

Policies addressing other opportunities are presented below.

10.1: Electric vehicles

The Office for Low Emission Vehicles (OLEV) has prepared a UK-wide strategy⁴² which seeks to ensure that by 2050 nearly every vehicle purchased in the UK will be an ultra-low emission vehicle. Pure electric or 'EVs' and plug-in hybrid vehicles are anticipated to take an increasing share of the new car and van market over the next 40 years. The use of electric vehicles is an important measure in reducing emissions locally with provision of necessary infrastructure essential. It is therefore important that new development responds to these changes.

Paragraphs 105 and 110 of the NPPF note that spaces for electric charging and other ultra-low emission vehicles should be provided, and that these should be in safe, accessible and convenient locations. Planning policies should be in compliance with and contribute towards EU limit values and national objectives for pollutants, taking account of Air Quality Management Areas and the cumulative impacts on air quality from individual sites⁴³.

³⁸ The National Atmospheric Emissions Inventory presents an interactive map of air pollutants, see: <http://naei.defra.gov.uk/data/gis-mapping>

³⁹ See Defra air quality website: <https://uk-air.defra.gov.uk/air-pollution/>

⁴⁰ Clinical Commissioning Group for Eastbourne, Hailsham and Seaford, Operating Plan 2016/17, April 2016. Also see: East Sussex Downs and Weald Primary Care Trust, November 2010 http://www.eastsussexjsna.org.uk/JsnaSiteAspx/media/jsna-media/documents/scorecards/2010_11/Hailsham_final.pdf

⁴¹ See for example recent consultation undertaken by Defra seeking views on how to improve air quality through the reduction of nitrogen dioxide in towns and cities. <https://www.gov.uk/government/consultations/improving-air-quality-reducing-nitrogen-dioxide-in-our-towns-and-cities>. Improving air quality is also central to achievement of the United Nation Sustainable Development Goals <http://www.un.org/sustainabledevelopment/sustainable-development-goals/>

⁴² <https://www.gov.uk/government/news/uk-government-pledges-bold-ambition-for-electric-cars>

⁴³ see NPPF, paragraph 181

In order to promote a greater role for plug-in vehicles the Town Council will support development proposals which seek to encourage the use of electric vehicles. Policy text in relation to the provision of charging points within new housing developments has been reviewed by East Sussex County Council to ensure a consistency of approach across all Neighbourhood Plans being prepared in the County.

Policy HAIL AQ1: Charging points for electric vehicles

Where it is appropriate for development to provide public parking, encouragement is given to a proportion of spaces being equipped to provide charging stations ready for immediate use by electric cars and vans.

Wherever possible public EV charging infrastructure, such as cabling, should be provided such that it can be expanded to provide additional charging stations for future use.

EV charging points should be positioned sensitively to ensure that there are no harmful impacts upon pedestrian circulation or the immediate appearance of the street scene and wider townscape.

New housing development should provide electric vehicle charging points. There should be at least one charging point per dwelling for houses and for flats which have an allocated car parking space. For flats which don't have an allocated parking space, provision should be made for a shared communal charging point.

10.2: Green buildings and renewable energy generation

Most carbon dioxide emissions come from heating, cooling and powering buildings. Reducing carbon dioxide emissions and other air pollutants will contribute to objectives to reduce greenhouse gas emissions and tackle the effects of man-made climate change.

Growth in population and employment is likely to make it challenging to reduce emissions. However, growth also provides a number of opportunities for securing reduced emissions, including the construction of highly energy efficient homes, the development of decentralised energy networks and retrofitting of existing homes to reduce their energy use and fuel bills

All development in Hailsham will be expected to make use of the best available sustainable design and technology. Proposals for development are expected to minimise the use of resources, mitigate against and be resilient to the impact of climate change. Current sustainability standards for new construction⁴⁴ should be used for assessing the sustainability of new, non-residential buildings. The Home Quality Mark⁴⁵ has been developed by BREEAM to provide an indication of the quality and environmental performance of a new home. Housebuilders are encouraged to use this assessment method.

⁴⁴ Including those established by BREEAM UK, Non-domestic Buildings (United Kingdom), Technical Manual SD5076 4.1, 2014, and LEED: see <https://www.usgbc.org/leed>

⁴⁵ see: <http://www.homequalitymark.com>

Buildings should be designed to maximise solar gain and incorporate technologies that maximise the use of energy from renewable sources. Proposals for new development are encouraged to incorporate the following:

- Solar photovoltaic panels
- Solar Thermal Panels
- Air Source Heat Pumps
- Ground Source Heat Pumps
- Biomass Boilers

The Town Council is particularly encouraging of proposals for new buildings that achieve zero or near zero net energy consumption (Passivhaus standard⁴⁶).

The Town Council welcomes the opportunity to work with parties who would like to explore renewable energy schemes in Hailsham, particularly community-led micro generation projects. Where such schemes are brought forward they will need to comply with the wider policy framework, including landscape and design implications.

Policy HAIL AQ2: Sustainable design and construction

Proposals for new development are required to embed sustainable design and construction techniques from the outset.

Applications for development are encouraged to demonstrate accordance with the appropriate Building Regulations, BREEAM or LEED⁴⁷ standards in use at the time of submission. Encouragement is also given to schemes that meet Passivhaus standards.

Housebuilders are encouraged to register for assessment under the Home Quality Mark. This should show how resource efficiencies and climate change adaptation measures will be incorporated through aspects such as the layout of the proposed development, orientation, massing, landscaping and building materials.

Waste, recycling and storage areas should be provided. Equally, systems that reduce water consumption and allow for the reuse of grey water is encouraged. The impact on flood risk from development should be minimised.

Encouragement is given to proposals for development that maximise the opportunities for using on-site renewable forms of energy.

Policy HAIL AQ3: High energy efficient buildings

Development proposals which demonstrate that the proposed buildings have a net emission rate of zero or below, or are proposed to be certified Passivhaus buildings, are encouraged, and will be considered favourably subject to other policies.

⁴⁶ see: <http://www.passivhaus.org.uk> - Passivhaus is the world's leading fabric first approach to low energy buildings. The core focus of the Passivhaus standard is to dramatically reduce the requirements for space heating and cooling, whilst also creating excellent indoor air quality and comfort levels

⁴⁷ See section 3.3 for information on LEED

Policy HAIL AQ4: Renewables

Applications for renewable energy schemes will be required to demonstrate that they do not have a significant adverse effect on landscape and townscape character, biodiversity, heritage or cultural assets or amenity value.

Community initiatives which seek to deliver renewable and low carbon energy will be encouraged in appropriate locations.

New developments also need to consider any negative impacts they may have on the operation of existing buildings, including impacts on renewable or low carbon energy supply. Where a proposed development is identified as being likely to have negative impacts on renewable or low carbon energy supply on adjoining land, the applicant will need to undertake the relevant analysis to demonstrate and quantify the nature of the impact and justify this impact.

POLICY SECTION B: POLICIES FOR FUTURE GROWTH

This section of the Neighbourhood Plan introduces policies that apply to any planning applications that may come forward in relation to major development and growth on the edge of the existing built-up area of Hailsham. This includes those sites identified in the Core Strategy and others which may potentially come forward through the emerging Local Plan.

“Quality of place, it turns out, is less a frivolity and more a necessity.”

Richard Florida

11. The growth of Hailsham



11.1: Masterplans and Development frameworks

The adopted Wealden Core Strategy allocates land to the north and east of Hailsham for new housing development. The Strategic Sites document that was to provide more detail on the form of development in these areas was withdrawn in 2015 with work on the new Local Plan commencing instead.

Evidence to the emerging Local Plan identifies a need for additional growth and development in Hailsham. Opportunities for growth (see Appendix A of this Neighbourhood Plan) are identified to the south and east of the town, as well as additional expansion in the north (beyond that proposed in the Core Strategy).

Wherever development takes place, it should help deliver a comprehensive approach to development, particularly where opportunities for growth comprise a mix of different landownerships. Through work on the Neighbourhood Plan the view has been taken that any major development must be delivered in a coordinated manner, demonstrating good placemaking principles and generating benefits to the quality of place for existing residents.

The Neighbourhood Plan recommends that proposals for major development should be informed by the production of masterplans that comprise part of a development framework. This should place the site in its wider context and avoid narrowly looking at landownership boundaries. The development frameworks will help deliver comprehensive development. This approach applies to all land around Hailsham that might come forward for major development in the future.

Development frameworks should be prepared and agreed by the Council prior to any application for development being submitted. Development frameworks should establish the design principles for the sites, including integration with existing areas and neighbourhoods, connections and linkages allowing movement for all, the location and mix of uses, and provision of community infrastructure and green space.

Development frameworks should help create places of distinct character and variety, responding to local building types and materials, how the place will be used and need to adapt over time.

Consideration should be given to a sensible and logical approach to phasing, such that new development works well from the outset, with the impact of ongoing development on new and existing residents minimised.

Policy HAIL SD1: Development frameworks

Applicants for development schemes for any major development site on the edge of Hailsham are encouraged to prepare Development Frameworks for approval by the Council prior to submission of any planning application. Where a site crosses multiple land ownerships, the different landowners are encouraged to work together to prepare a joint development framework that demonstrates how comprehensive development will be delivered.

The development frameworks should demonstrate how good placemaking can be achieved through establishment of:

- A clear vision and concept for the development.
- A development and land use plan showing the mix and type of development to come forward, including the broad locations of necessary supporting services, including local centres, health and education.
- Framework plans establishing the intended form and grain of development, character areas, densities and building typologies, which respond to local character and context.
- A movement plan establishing the street hierarchy and typologies, and sustainable transport measures prioritising walking, cycling and public transport.
- A green infrastructure plan setting out the network and typology of green spaces, links and areas of ecological importance.
- A phasing and delivery plan, demonstrating a logical pattern of development that helps build community with supporting facilities provided at the right time.

Development frameworks should outline how infrastructure (physical, social and green)⁴⁸ will be delivered and the mechanisms by which landowners will work together to deliver those infrastructure items. Provision of waste water treatment and appropriate drainage is essential and must be agreed with the relevant organisations, including the statutory water company and the Environment Agency, as well as the lead local flood authority and, in relation to the Pevensey levels, the competent authority for the purposes of the Habitat Regulations. All infrastructure shall be well designed and accord with best practice and design principles outlined in the development plan and other relevant guidance.

The Development Frameworks will be subject to a programme of community consultation and supported by a statement outlining feedback received during the process and how the framework has responded to this.

⁴⁸ Physical infrastructure includes highways, utilities, waste and water, social infrastructure includes schools, healthcare and play space, green infrastructure includes natural and semi-natural green space.

11.2: Design and placemaking principles

Proposals for major areas of development provide the opportunity to provide a mix of uses, including, for example, schools, healthcare, parks and playspaces. Such uses should be located such that they are in easy walking, or cycle, distance of the home, and do not result in additional and unnecessary traffic movements, either within the development area or on the existing highway network. Planning and design strategies that promote sustainable travel to school are encouraged.

Within each area the network of proposed new streets should be considered, identifying how this facilitates movement, connects with existing neighbourhoods, and which presents an optimal balance between different modes of travel, including provision of extended bus routes.

New green spaces will also need to be provided, providing a combination of amenity space for local play, leisure and recreation, as well as natural green space which will help respond to the setting of and proximity to the Pevensey Levels. Green space should be delivered in accordance with the green space standards established by Wealden District Council.

Proposals for development on the edge of Hailsham should also create places of character and interest, responding both to the site-specific opportunities but also the positive characteristics displayed within the built form of Hailsham as outlined in the Hailsham Character Area Assessment, including, for example, the use of materials.

Policy HAIL SD2: Design and placemaking principles

Applications for any major development proposals, including those to the edge of the existing built-up area of Hailsham, are encouraged to demonstrate how they respond to best practice through submission of a Building for Life 12 assessment (or a later equivalent). They should also show how they have responded to the recommendations in the Hailsham Character Area Assessment. Applicants should demonstrate how they meet the following design principles:

1. Achieve a high quality, attractive, accessible and safe environment;
2. Promote innovation in design so that contemporary and traditional design approaches are proposed where appropriate;
3. Achieve a high level of integration between the existing communities and new development and ensure that the new development is part of a cohesive whole;
4. Create a sense of place within each character area and reinforce local distinctiveness where appropriate;
5. Create a legible layout with buildings addressing road frontages, public area frontages and a coherent structure of buildings, open space and routes for movement (walking, cycling, public transport, private car);
6. Locate community uses and facilities, such as schools, healthcare and parks, to maximise potential for walking and cycling to these. Design measures that minimise journeys to school by car must be integrated within the proposed development layout.
7. Optimise the placemaking function of streets, allowing for public transport connectivity but without vehicles dominating the street environment.
8. Ensure that a mix of housing types and styles are provided across the site and therefore a diversity of building forms and a varied street scene;
9. Ensure that the edges of the sites, where development meets the surrounding countryside, is addressed sensitively in landscape terms;
10. Ensure that new development respects the scale, massing and proportions of buildings within the adjoining residential areas of Hailsham;
11. Secure attractive and clearly defined public and private spaces that will enable retention and enhancement of the existing landscape, trees and vegetation.

11.3: Maintaining design quality through to delivery

In addition to development frameworks, the preparation and submission of design codes are welcomed. These can either form part of the development framework, or comprise part of a planning application for any major development proposal.

Design codes can be used to provide greater certainty and control over design quality in the long term. The NPPF says that local authorities should consider their use where they could help deliver high-quality outcomes. The design codes should cover building heights, depths and widths, street typologies and landscape treatments. The code may also include details of façade treatments. The design principles underpinning the codes should reflect best practice as outlined in Building for Life 12 (or other subsequent updates or guidance).

Policy HAIL SD3: Design codes and quality

Prior to the approval of any reserved matters or grant of detailed planning permission the Council welcome the production of Design Codes for any major development proposal.

POLICY SECTION C: POLICIES FOR HAILSHAM TOWN CENTRE

This section of the Neighbourhood Plan presents policies that apply to change and development in the town centre. For the avoidance of doubt, these policies apply to the town centre area as defined in the emerging Wealden Local Plan (and as mapped in Figure 15).

To all Citizens of Heylesham

We have granted and by this our charter have confirmed to our dear and faithful Peter of Savoy, Duke of Richmond that he and his heirs in perpetuity may have a market in his manor of Heylesham every week on Wednesday with all customs pertaining to such a market, so it be not to the detriment of neighbouring markets. A toll on chattels and beasts to be collected in the market place each Wednesday market.

King Henry III

12. Hailsham town centre



12.1: Change and development in the town centre

Strong and successful towns have a strong centre. The National Planning Policy Framework encourages the use of planning to support “strong, vibrant and healthy communities” and improve the vitality and competitiveness of town centres.

Town centre issues

Analysis undertaken of Hailsham town centre for this Neighbourhood Plan and that generated to inform the emerging Local Plan shows that:

- **Built form:** The town centre benefits from a fine grain historic high street, but this is surrounded by larger scale retail and civic uses which contrast with the historic structure. The result of this is that the high street is surrounded by a ‘transition area’, where streets and frontages are fragmented and dominated by car-based infrastructure, before then moving into more traditional residential development. It is also notable that there are few green spaces within the town centre itself, though there is green space on the edge of the centre. The ‘Town Square’, adjacent to the Vicarage Walk shopping centre, comprises an important central public space in the heart of the town.
- **Car parking and frontages:** Surface car parking comprises the main use of land in the town centre, the presence of which, along with areas for servicing, has resulted in the fracturing of much of the town centre. Although parking is important to the operation of the town it represents an inefficient use of land in its current format. It also results in a series of traffic dominated spaces, which is particularly pronounced along North Street, undermining the pedestrian environment, welcome and visitor experience. The traditional street structure in the town centre benefits from strong and active frontages, with doors and windows opening onto the street, but there are also a series of exposed ‘backs, often associated with the larger units and edges of car parks, which again, create unwelcoming and unattractive spaces (see Figure 15).
- **Historic environment:** As noted above, the high street is of a historic nature and retains strong and well activated frontages related to the street. There are many buildings of high quality in and around the town centre, including listed buildings along George Street, with the Church being an important local landmark. The scale and materials of many of the buildings reflect the local geology and generate local character⁴⁹. Much of the town centre is designated as a conservation area. Although this doesn’t preclude change and new development from coming forward, it does mean it must be of the highest quality. The quality and setting of the conservation area is though undermined by the fractured environment and poor quality of many of the frontages to the rear of the high street.

⁴⁹ Hailsham Character Area Assessment, prepared on behalf of Hailsham Town Council, July 2017



Figure 15 Hailsham town centre car parking / servicing areas and the conservation area

Note: The town centre boundary as shown on this plan reflects the boundary as drawn in the Submission Wealden Local Plan..

- Movement and access:** The structure of the road network in Hailsham ‘funnels’ routes through the town centre, with resultant congestion at key junctions and high volumes of traffic along North Street. Movement at these junctions results in conflicts between pedestrians, cyclists and vehicles. This is emphasised by a review of traffic accident and collision data in the town centre for the past five years⁵⁰, showing safety concerns associated with (a) the junction of the High Street and George Street, (b) the junction of the High Street and Battle Road, and (c) pedestrian crossing points on main routes into and around the town centre. Linked to this last area of concern is the network of pedestrian routes which, in many places, are incomplete and unconnected (see Figure 16). Furthermore, the Cuckoo Trail is poorly integrated with the town centre: the main ‘arrival point’ for the Trail is the South Street car park, which is not conducive to pedestrian and cycle movement, and where traffic is at its busiest. The route from here and along North Street also suffers from high levels of traffic noise⁵¹, which further undermines the quality of the environment.
- Retail offer:** The Council’s Town Centre and Retail Study⁵² notes that there is under provision of convenience floorspace in the town centre compared to the national average, despite the presence of three large superstores. The study found that expenditure is leaking from the town. Equally, the proportion of comparison floorspace in the town centre is below the national average and only provides for basic or specialist needs, and that there is a high leakage of expenditure to towns such as Eastbourne and Brighton. It also suggests that although the area between the Vicarage Fields shopping centre (anchored by Waitrose) and the Quintins shopping centre (anchored by Asda) forms the heart of the shopping area, the public realm would benefit from investment and improvement. These are considered to be dated, do not offer the right format of units, and have a poor relationship with the street. Improvements to the quality of floorspace and street environment would enhance access and enjoyment of the town centre. Furthermore, it is suggested that the town centre would benefit from higher quality food and beverage establishments, supporting the day and night time economies. The presence of the market is considered a positive for the town centre.

⁵⁰ See <http://www.crashmap.co.uk>

⁵¹ See English Strategic Noise Mapping data published by Defra: <http://andjnewman.github.io/noise-map/leaflet-complete-noise.html>

⁵² Carter Jonas for Wealden District Council, Town Centre and Retail Study 2016, December 2016, http://www.wealden.gov.uk/Wealden/Residents/Planning_and_Building_Control/Planning_Policy/CoreStrategy/CoreStrategyLibrary/Planning_Evidence_Base_Economy.aspx

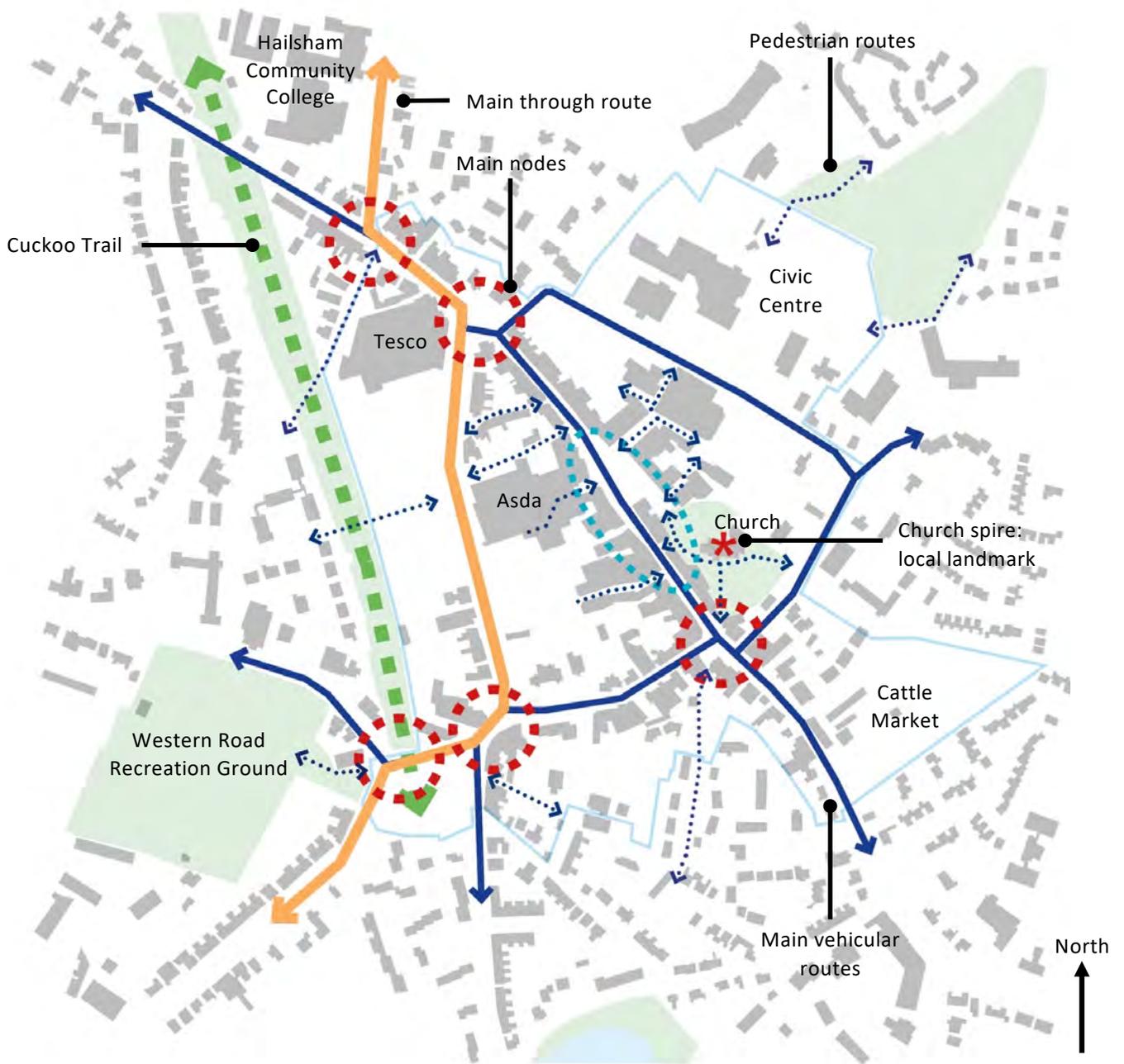


Figure 16: Existing movement network in Hailsham town centre

Town centre opportunities

The vision for the town centre is that it will be a thriving centre with a diverse range of facilities, uses and attractions, and where new development responds to the historic qualities of the built form. It is intended that the town centre is the beating heart of Hailsham, where public, economic and cultural life all come together.

The consultation undertaken for the Neighbourhood Plan expressed preference for a wider range of independent and high street retailers, as well as an expanded market. Provision is made in the emerging Wealden Local Plan for 1,500 sqm (net) of new comparison retail floorspace in the town centre as well as 1,000 sqm (net) of convenience floorspace.

But new floorspace alone will not deliver the step change required in the town centre. The Council's Retail study⁵³ notes that the quality of the public realm in the town centre could be improved, as could connectivity to and within the centre. Streets and spaces account for the vast majority of public space in the town centre. Improving the quality of these will enhance the visitor experience.

A wider range of uses should also be encouraged to locate in the town centre, providing for a greater diversity and activity in the town centre throughout the day, drawing people in at different times of day and thus supporting retail and other commercial activities. Providing for some new residential development in the town centre will also help create life and activity, and offer a new housing offer for Hailsham.

The adopted Core Strategy seeks to improve the retail offer of town centres by, amongst other things, encouraging an appropriate mix of uses, including residential development, in the centres. Although subject to change, the Submission Wealden Local Plan makes allowance for 300 residential units to come forward on windfall sites in the town centre over the life of the Plan. It also suggests that another 501 units might come forward on windfall sites within the Hailsham development boundary (which is slightly different to the Neighbourhood Plan boundary). The Neighbourhood Plan supports and encourages new development in the town centre, including delivery of new residential units. This could be realised through new mixed-use development, with commercial use on the ground floors and residential above⁵⁴.

The emerging Local Plan identifies opportunities in the town centre for new development, including existing car parks (see Appendix A). Although this Neighbourhood Plan does not allocate specific sites for development it does establish key principles that applicants should respond to and which are intended to help deliver improvements in the town centre. Key opportunities for the town centre include:

- Strengthening east west connections to and through the town centre, linking with the wider green space network and completing the pedestrian network within the town centre, making these better connected, more convenient and comfortable to use, convivial and conspicuous⁵⁵.

⁵³ *ibid*

⁵⁴ Research published by the Federation of Master Builders (Lichfields and Child Graddon Lewis for the Federation of Master Builders, December 2017, Homes on our High Streets: How to unlock residential development on our High Streets) suggests that, across the UK, 'there is significant untapped potential to create additional homes above shops, on or near the high street', including 'unutilised space above shops that could be more intensively used or redeveloped into additional housing units'. The research also suggests that realising this potential can do more than just deliver new homes, as 'revitalising our high streets through well planned and designed residential units could help rejuvenate smaller town centres'

⁵⁵ See for example the 'Five C' principles of creating good walking environments as outlined in 'Going to town: improving town centre access', published by the National Retail Planning Forum in 2002 and formerly comprising a companion guide to PPG6. The document can be accessed online: <http://www.nrpf.org.uk/PDF/goingtotown.pdf>

- Maximising the Cuckoo Trail through improved connections to this and promoting complementary uses close to this that will enhance the user experience.
- Promoting public realm improvements and a network of enhanced public space, with improved street fronts as places where people enjoy being and feel safe in.
- Repairing fractured streets by exploring the potential to rationalise car parking space and bring forward new development opportunities that make more efficient use of the land and help bring vitality and life to the town centre.
- Rationalising major junctions to provide a better balance between competing users, making conditions safer for pedestrians and cyclists.
- Enhancing the quality of the town square as a multi-functional and lively space that is active and welcoming throughout the day.
- Optimising the use of land by exploring opportunities to bring forward more effective parking solutions that makes land available for new mixed, town centre uses and activities.
- Reflect and respond positively to the prevailing building heights in the town centre (See Figure 17) and heritage assets (Figure 19).

The policies outlined in this section are intended to help guide change and future development such that it contributes to a stronger and better functioning town centre. Alongside these a series of design principles are illustrated (Figure 18) and which applicants for new development should respond to in proposals. The principles reflect good practice in urban design and are intended to help create active and interesting places that can be enjoyed by all, and which help towns flourish by creating ‘sticky streets’ –those places where people want to go to and spend time in⁵⁶. These principles also respond to the existing urban grain, the health and social benefits to be gained from human scale active places and well-articulated building fronts⁵⁷.

⁵⁶ See for example: <https://www.planetizen.com/node/69454>

⁵⁷ See for example, research published by Colin Ellard in Places of the Heart, 2015: <https://aeon.co/essays/why-boring-streets-make-pedestrians-stressed-and-unhappy>

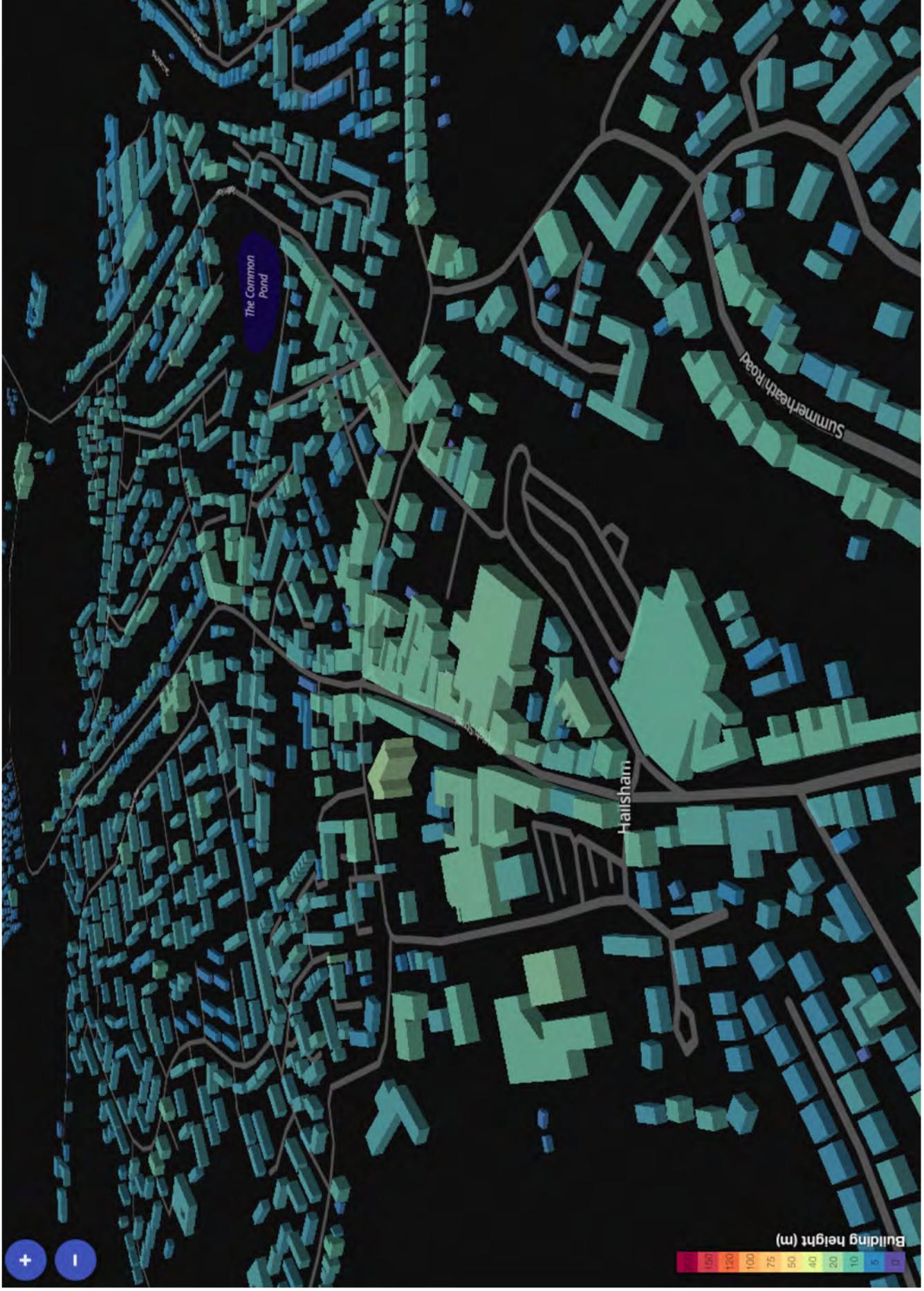


Figure 17: Prevailing building heights in Hailsham Town Centre (Source: <http://buildingheights.emu-analytics.net>)

Policy HAIL TC1: Hailsham town centre

Any proposals for new development in the town centre should broaden the retail offer, adding to the vitality and viability of the centre, and enhance its image as a destination for shopping.

Proposals for new retail development and other complementary town centre uses within the town centre are welcome, particularly where they strengthen the retail offer and visitor experience. Suitable town centre uses include:

- Retail development (A1 & A2 use class)
- Leisure and entertainment (A3, A4 & D2 use class)
- Office development (B1 use class)
- Arts, culture and tourism (D1 use class)

Applications for town centre uses that contribute to the evening and night time economy, including leisure, cultural and community facilities are welcome. These will be required to enhance and diversify the offer within the town centre, subject to assessment of scale, character, location and impact of the proposed uses.

Proposals that contribute to an improved range and quality of office and business accommodation, including space for start-up businesses (use class B1) are encouraged. The use of empty and vacant floorspace on upper storeys is encouraged, particularly for office or residential use.

Applications for residential development are encouraged, particularly where they comprise part of a mixed-use scheme. In such cases, residential units will be provided on upper floors, with the ground floors comprising retail or other complementary uses.

Meanwhile uses⁵⁸ that provide for temporary use of vacant buildings are encouraged. Such uses will only be considered acceptable where they comply with the use classes outlined above.

Applications for new development will be required to demonstrate how they:

- Respond to good practice design principles, including recommendations in the Hailsham Character Area Assessment.
- Strengthen the core retail area along the High Street.
- Optimise the use of land through the mixing of development and management of car parking provision.
- Facilitate new and improved pedestrian and cycle routes, particularly on an east west basis, at main junctions, and integrating with the Cuckoo Trail.
- Contribute to the delivery of an improved public realm within the town centre.

Applications for development that seek to enhance existing community facilities or provide new community facilities in the town centre will be supported. Proposals associated with community uses should:

- Ensure that all facilities are easily accessible to everyone
- Successfully capitalise upon opportunities to promote walking, cycling and public transport
- Offer an internal layout that will allow for the future adaptability of internal spaces to aid with the co-location of other appropriate community uses and functions

Development proposals will be required to be acceptable in terms of the impact of traffic generation and vehicle movements (including servicing arrangements) on the highway network and be both pedestrian and cycle friendly.

⁵⁸ For more information see: <http://www.meanwhile.org.uk>

Policy HAIL TC2: Town centre design principles

All proposed development will be required to reflect best practice design principles, responding positively to the character and qualities of the town centre. Key design principles for the town centre include:

1. Active frontages and street level activity should be provided. Generous floor to ceiling heights at ground floor level should be provided to allow for flexibility and change of use over time.
2. The principal points of access to buildings should be from the main street on to which it fronts.
3. Buildings should respect the prevailing building height in the town centre. Where building heights vary this change should be subtle and step up or down by no more than half to one storey between buildings.
4. Proposals for new development should respect local context through continuity of the building line, responding to adjacent building heights, roof and cornice lines.
5. Buildings should be aligned with the back of the pavement edge and also provide space for activity within the public realm.
6. Corner buildings should be well articulated and blank gable ends avoided.
7. Blank walls and exposed back land areas, including servicing yards and car parking should be screened from view, preferably through the wrapping of these with active development edges. Alternatively, opportunities for green walls and artwork that enhances the quality of the townscape will be encouraged.
8. Development to the rear of existing buildings will be considered acceptable where it helps enclose space, define the public and private realm, create new active frontages, and would not unduly impact upon the operation of existing units.

Applications will need to demonstrate how they reflect local vernacular through the scale and design for buildings and use of materials, contributing positively to the quality and character of the town centre, and the high quality historic townscape of the conservation area. Reference to the Hailsham Character Area Assessment should be made.

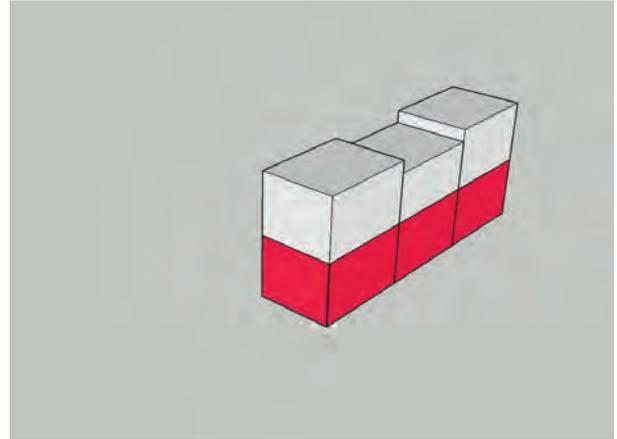
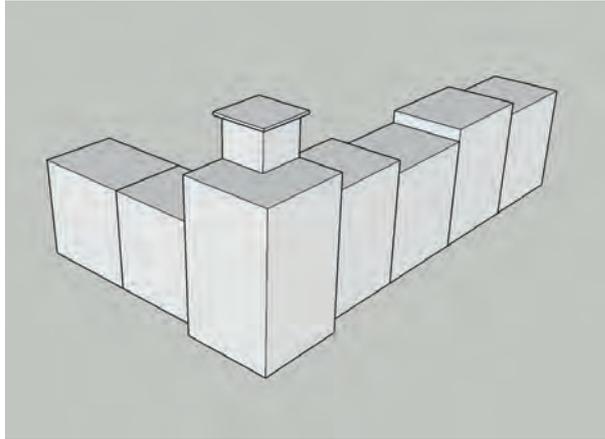
Applications for new development will be required to respect the ability for markets and other events to operate in the town centre.

The design principles outlined on the following pages (Figure 18) provide guidance that should be reflected in proposals for development in the town centre wherever appropriate. Development proposals should also respond to heritage assets in Hailsham town centre, including the conservation area and listed buildings (Figure 19)

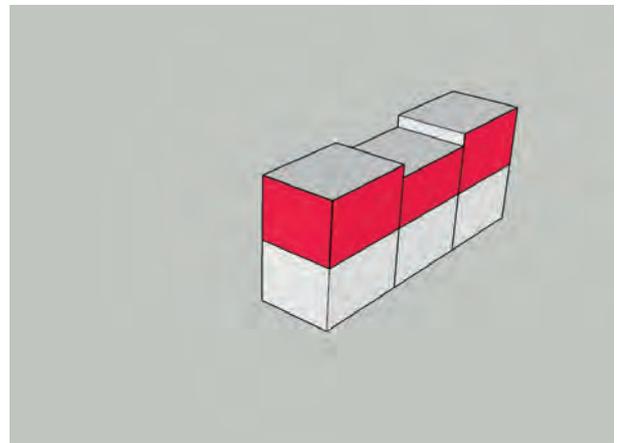
Policy HAIL TC3: Town centre heritage assets

Any new development or improvements proposed in the Town Centre should be undertaken with a view to preserving and enhancing the ancient market town character of Hailsham.

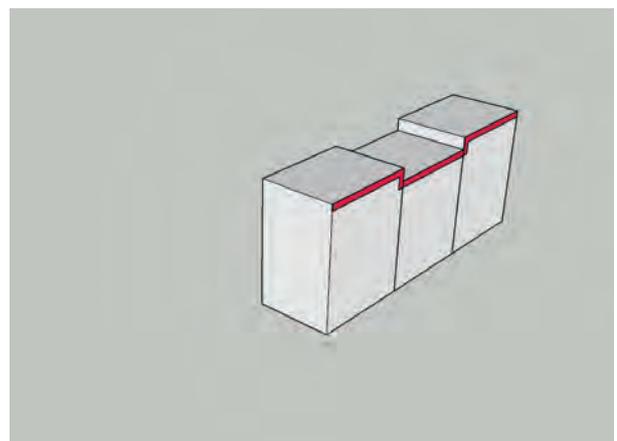
The Town Council will continue to work with Wealden District Council and other stakeholders to protect and, where possible, enhance the town centre conservation area, setting and quality of listed and locally listed buildings. Sensitive retrofitting and refurbishment of historic buildings for energy efficiency purposes will be encouraged.



1. Design for active ground floor street frontages with generous floor to ceiling heights to allow for change and adaptability over time.

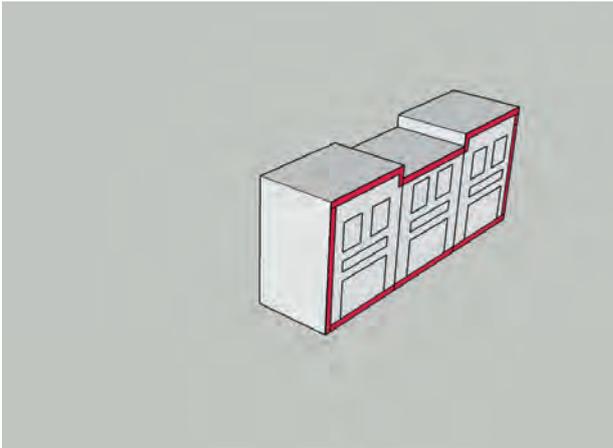


2. Plan for a mix of uses, including commercial and residential on upper storeys.

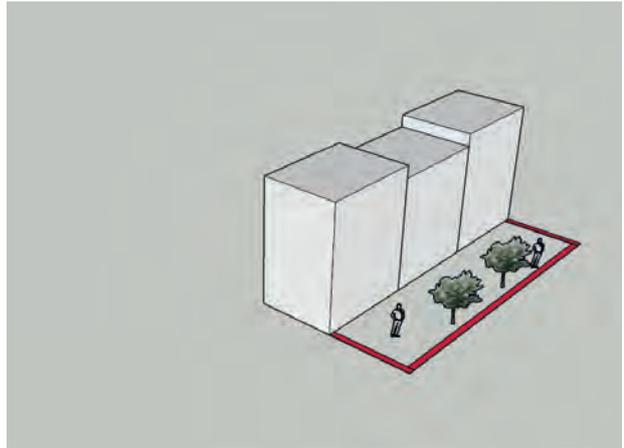


3. Respond to prevailing building heights and create subtle variations in height by stepping up by no more than one or half a storey between buildings.

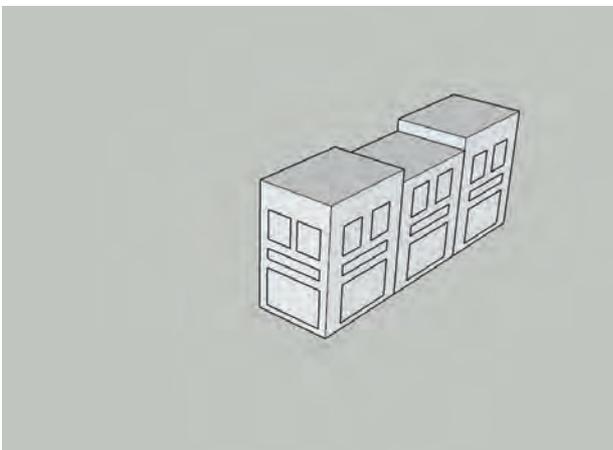
Figure 18: Design principles for new development in the town centre (continued on next page)



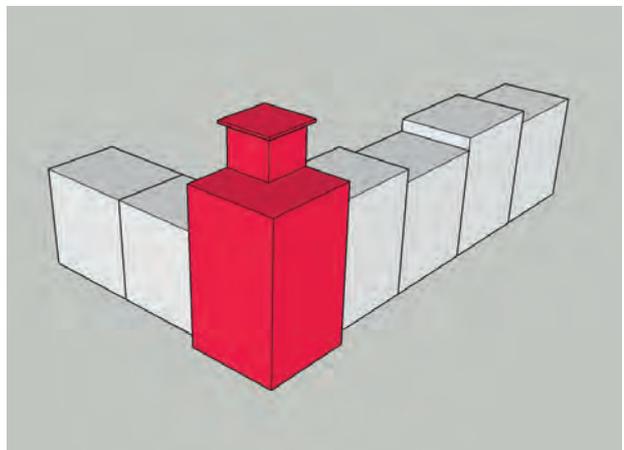
4. Create consistency in shop front design and through the use of local materials, including architectural details that unify the whole.



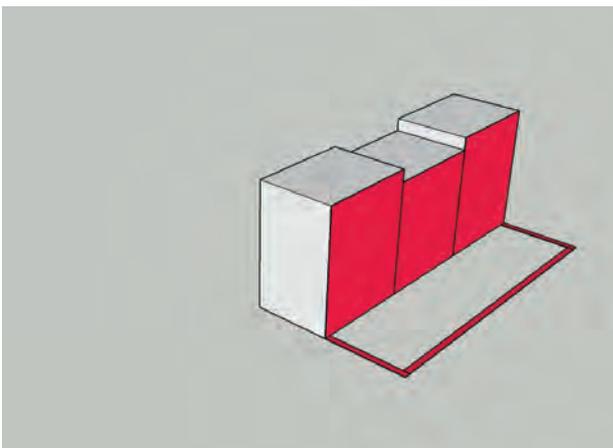
7. Set buildings back from the edge of the highway to create space for activity in the public realm.



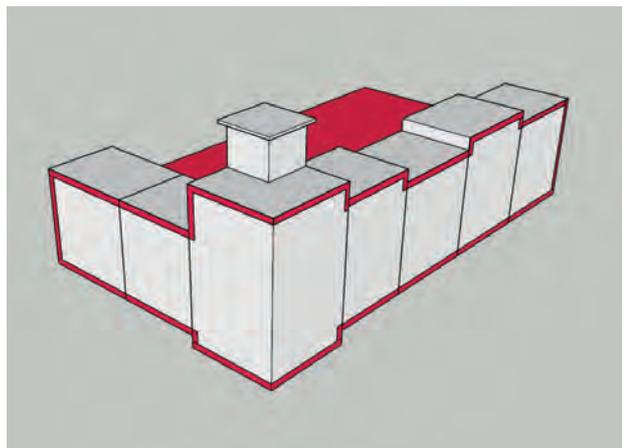
5. Doors and windows should overlook the street. Blank gable ends should be avoided.



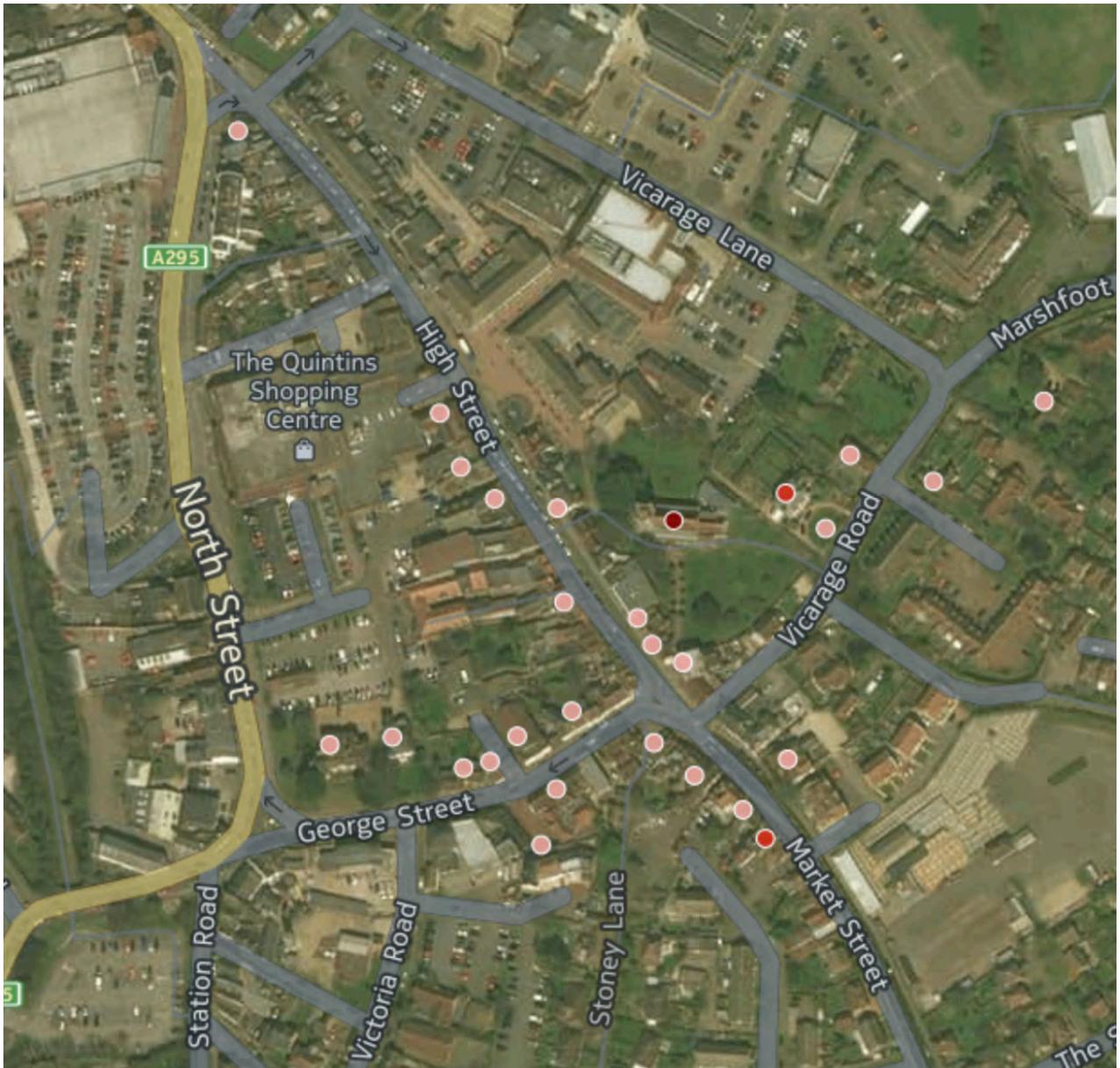
8. Important corners should be well articulated, helping to turn the street corner and link activities.



6. Create a strong and consistent building line that responds to the street.



9. Larger format retail, car parks and servicing areas should be 'wrapped' with complementary uses that create active street frontages.



Grade of Listed Building:

- I
- II
- II*



Figure 19: Listed buildings (and grade) within Hailsham Town Centre (source: <https://dancooksonresearch.carto.com>)

12.2: Town centre parking

Surface car parking represents the main use of land in the town centre, occupying approximately 5.5 hectares of land. That is the equivalent of around seven football pitches.

Although provision of parking is important it could be provided in a more effective and efficient way. The same amount of parking could be provided through the use of decked structures for example, reducing the amount of land occupied and freeing this up for other uses that bring life and activity to the town centre, including new shops, businesses and residential use.

Although the overall number of parking spaces in the town centre should not be reduced, rationalisation of the space is promoted. Where the decking of car parking is proposed, it should be undertaken in such a way that improves the quality of the street environment. Areas of parking should be 'wrapped' with complementary uses that include active fronts at ground floor level.

The Town Council will continue to work with the District Council and Highways Authority to identify how and where parking could be rationalised, and a strategy put in place that promotes smarter parking arrangements, with accessible, well-designed parking provided in places that reduce vehicle movements in the town centre⁵⁹. As technology develops and becomes more accessible, so data should be used to influence smarter parking strategies. Reference should also be made to the East Sussex County Council guidance on parking⁶⁰.

Policy HAIL TC4: Town centre car parking

Development should not result in an overall loss of public parking in the town centre.

Opportunities to rationalise town centre surface car parking are encouraged, to make more efficient use of land.

Where development proposals include decked parking provision the following will need to be demonstrated:

- That the proposal does not result in unnecessary traffic movement to, in and around the town centre
- That the proposal contributes to the quality of the street environment through integration of appropriate town centre uses that wrap the development and include opportunities for inclusion of active ground floor uses.
- Routes between the proposed development and town centre activities are clear, logical and well overlooked.

Development proposals will be supported that improve the quality of the street environment, particularly along North Street and Vicarage Lane, whilst not undermining the parking and servicing role provided along these streets.

Proposals for parking provision are encouraged to explore the opportunities for utilising site topography to accommodate multiple levels of parking. In such instances, the proposal will be required to demonstrate that local and long-distance views are not affected.

⁵⁹ The Town Council commissioned East Sussex County Council to undertake a survey of car park usage in 2017. Alongside this, interviews with businesses and visitors to the town centre were undertaken. This showed that many people make regular though short trips to the town centre, and that although people do drive, many visitors also arrive by bus or foot. Those arriving by foot spend less each time they visit the town centre than those arriving by other modes, but through multiple visits, often spend more over the course of a week than those travelling by car or bus.

⁶⁰ East Sussex County Council, <https://www.eastsussex.gov.uk/environment/planning/applications/developmentcontrol/tdc-planning-apps/>, accessed February 2018

12.3: Shopfronts and commercial frontages

There are a wide range of commercial business premises operating in the town centre. These include shops and offices, bars, cafes and restaurants and clubs. Inevitably, the quality of design of their frontages and associated signage varies considerably.

The quality of the shop fronts along the High Street and within the town centre as a whole has an influence on the appearance and attractiveness of the town centre. During consultation the visual appearance of buildings in the town centre was raised: many people thought that the upkeep and maintenance of the buildings could be improved, and that a consistent approach to signage and shopfronts would make an improvement to the experience of the town centre⁶¹.

Poor quality signs and materials undermine the visual quality of the town centre and the historic qualities of the centre that the District Council is seeking to preserve and enhance through the conservation area designation. It is thus considered important that shopfronts respond better to local character, and bring a consistency of style to the town centre.

The Town Council will pursue production of a town centre branding strategy to emphasise the special qualities of the town, to attract a wider range of businesses, visitors and investment. As part of this production of a “Hailsham style” shopfront design guide will be promoted.

The Town Council, in collaboration with other relevant stakeholders and public bodies, will explore opportunities to offer grants or other incentives to shop and landowners to promote the repair of damaged facades, reinstate lost historic features and install high quality traditional windows and shop fronts in the town centre

Policy HAIL TC5: Shopfronts

Well-designed improvements to existing shopfronts and other commercial properties in the town centre are welcomed.

Proposals for new shopfronts and commercial properties should be designed such that they are well proportioned and enhance the character of the building, Hailsham Town Centre Conservation area and the town centre as a whole.

The protection of and reinstatement of original architectural features, where appropriate, is supported. This includes retention of existing or provision of new pilasters and cornicing.

The use of shop signage on pavements should be limited to reduce clutter within the town centre. Any new signage on pavements that is associated with the business of the individual premises should have due consideration for the character and design of the street furniture in the wider area and should seek to enhance the public realm.

Existing guidance contained within the Wealden Design Guide SPD (or later equivalent) should be used to inform proposals.

⁶¹ Similar responses were made to consultation undertaken by Hailsham Forward in 2013, with a third of all respondents noting that unkempt shopfronts make the town centre look untidy.

Projects HAIL TC1: Town centre shopfronts and branding

The Town Council will look to create a Hailsham specific shopfront design guide that brings unity of appearance to the town centre.

Alongside this the potential for a town centre branding strategy will be investigated by the Town Council, which will help market the town centre offer, attract businesses and visitors. This will be regularly monitored and updated over time.



Figure 20: Examples of good shopfront design, responding positively to the building and setting

12.4: Streets, spaces and the public realm

The public realm is defined as all the spaces between buildings to which the public has access. The importance and value of good quality public realm is well recognised⁶².

In Hailsham town centre recent street works have sought to improve the quality of the public realm along the High Street, George Street and Vicarage Lane. However, many places remain traffic dominated and present an underwhelming environment and visitor experience. Efforts to improve the quality of the street scene are encouraged, including rationalising the amount of road space, through the narrowing of the carriageway for example, removal of unnecessary street signs that cause visual clutter, and extension of the current public realm works across the wider town centre to create a unified feel and appearance. The aim is to create an attractive and welcoming town centre environment that is open to and accessible for all, particularly for those on foot and bicycle.

The potential to provide new street tree planting is welcome, alongside the creation of new areas for people to sit and relax. In the short term, the Town Council will explore the use of Parklets⁶³ on a temporary basis to create new public space, before establishing a town centre-wide public realm strategy. Alongside this, blank walls and gable ends, the exposed backs of properties and unsightly service yards should be screened from view and their public face improved. The use of green walls and public art to enliven these areas is encouraged.

The Market Space is the main public space and gathering point in the town centre. It is an important nodal point between the High Street, shopping centres and Church, it is the location of the market and other public activities, and is where east west and north south pedestrian movements cross. However, the space is dated and provides limited opportunity for people to sit, relax and interact with each other. This is Hailsham's 'outdoor room'. Proposals that seek to enhance the quality of the public realm and provide for multi-functional use of the space throughout the week, and at all times, will be welcome.

Policy HAIL TC6: Streets and spaces in the town centre

Applications will be supported which contribute to an enhanced movement network by all modes, providing a comfortable and safe environment for pedestrians and cyclists, and improving access by public transport. Applications should help provide a network of well-designed social and civic spaces that support the cultural and economic life of the town.

All proposed developments should contribute to an improved movement network and enhance the quality of public realm.

The placing of tables and chairs in the street will be acceptable (subject to license) where it does not prejudice highway or public safety, the movement of pedestrian and cyclists, the operation of street events or markets, the character of the conservation area or result in activities that cause harm to residential amenity.

⁶² See, for example, CABE, *The Value of Public Space*, 2004: "A high quality public environment can have a significant impact on the economic life of urban centres and is an essential part of any successful regeneration strategy. As towns increasingly compete with one another to attract investment, the presence of good parks, squares, gardens and other public spaces becomes a vital business and marketing tool. Companies are attracted to locations that offer well-designed, well-managed public spaces and these in turn attract customers, employees and services". Other sources include: The Heart Foundation, *Good for Business: The benefits of making streets more walking and cycling friendly*, 2011

⁶³ For examples and guidance see: <http://pavementtoparks.org/parklets/>



Figure 21: Example images of well designed town centre streets and spaces

12.5: Public realm projects

A series of public realm improvements were delivered in Hailsham Town Centre in 2017, improving pedestrian crossing facilities and footway provision in the High Street, Vicarage Road, Vicarage Lane and George Street. This also included improvements to some of the bus facilities. A further series of projects have been identified which the Town Council will encourage applicants to respond to. Not all of these are directly related to individual development schemes and instead represent projects that the Town Council will look to take forward in discussion with the District Council and other partners. This forms the basis of projects towards which CIL receipts might be directed to.

Projects HAIL TC2: Town centre public realm

The Town Council will look to pursue the following projects in Hailsham town centre:

Walking and cycling:

- Increase east west pedestrian permeability between the High Street and surrounding uses
- An increased number and improved cycle parking facilities should be provided at suitable locations throughout the town centre.
- Enhancements to the southern gateway to town centre by resolving the pinch point at the junction of Western Road, Station Road and the A295. This could involve a simplified road layout that helps improve walking and cycling connections with the Cuckoo trail and including a new visitor hub for the trail, incorporating cycle parking, a café and toilets. This would include improved wayfinding and connectivity with the town centre and adjacent recreation ground

Public transport:

- Integrate a high quality public transport service to Polegate within the town centre, with associated waiting facilities.
- All bus waiting facilities should be of a high quality, with improved waiting areas and digital information.

Public squares:

- Strengthen and expand the market square, with use of materials consistent with the new materials used along High Street public realm project. It should be designed as a multi-functional space to allow for markets and other activities, but also with opportunities for sitting and incorporating new tree planting

Streets:

- A street greening and tree planting programme, increasing the tree canopy within the town centre and integrated with water management and sustainable urban drainage systems. Key locations for the introduction of new planting include North Street and Vicarage Lane.
- A street decluttering programme to rationalise and remove unnecessary signs, poles, pillars and other 'furniture', reducing the visual pollution and barriers to movement these create.
- Temporary use of Parklets to create informal public spaces in the town centre. The Town Council will consider launching a competition to design Parklets.

Public art:

- Use public art and green walls to enliven exposed backs and blank walls within the town centre. In all instances these should be well designed and maintained to enhance the quality of place and are able to stand the test of time.

13. Community Infrastructure Levy



The Community Infrastructure Levy (CIL) is a charge levied on development which is payable to the local authority and is intended to be spent on infrastructure projects in the District that help address the demands placed on an area resulting from growth. This might include, for example, spending on new transport infrastructure, health and educational facilities, open spaces and sports facilities.

A portion of CIL is payable to the Town Council for spending on local projects in the Neighbourhood Plan area. When the Neighbourhood Plan is made the Town Council will receive 25% of all CIL monies paid to Wealden District Council. In regard to what this money can be spent on, advice published by My Community notes⁶⁴:

“The neighbourhood portion of CIL can be used for a wider range of planning issues than infrastructure as long as they are concerned with addressing the demands that development places on an area.”

The Wealden District Council CIL Charging Schedule came into effect on 1 April 2016⁶⁵. All applications for development that are above the necessary thresholds will be subject to this charging schedule, or any subsequent updates to it. Associated with the Charging Schedule is a ‘Regulation 123 List’ which outlines the infrastructure items that the District will spend CIL receipts on. For Hailsham, these include improved public transport provision, health care and educational facilities.

Through consultation and work on the Neighbourhood Plan a series of projects have been identified which the Town Council intends to direct the neighbourhood portion of CIL towards. These are referred to through the neighbourhood plan, in the blue ‘projects’ boxes and referenced within the following CIL policy.

Alongside CIL, the District Council will continue to negotiate Section 106 agreements⁶⁶ with applicants which can provide funds or works to make development more acceptable in planning terms. The Town Council will liaise with the District Council as to the most appropriate form of Section 106 agreement relating to applications within the neighbourhood plan area.

In addition to future growth and development within the Neighbourhood Plan area, the adopted Core Strategy allocates a significant area of land to the north of the town for future development (this is also currently included within the Submission Local Plan). This falls within the neighbouring area of Hellingly Parish and although the neighbourhood portion of CIL from that area will be payable to Hellingly this growth will impact upon and place additional demands on infrastructure within Hailsham. The Town Council will continue to work with the District and neighbouring parishes to ensure that investment is targeted towards those projects necessary to facilitate cohesion and connectivity.

⁶⁴ My Community / Locality, 2017, Community Infrastructure Levy; Neighbourhood planning toolkit

⁶⁵ see:

http://www.wealden.gov.uk/Wealden/Residents/Planning_and_Building_Control/Planning_Policy/CommunityInfrastructureLevy/Planning_Community_Infrastructure_Levy.aspx

⁶⁶ see:

http://www.wealden.gov.uk/Wealden/Planning_and_Building_Control/Planning_Development_Management/Legal_Agreements/Planning_Legal_Agreements.aspx

Policy HAIL P1: Community infrastructure Levy

Where development projects trigger the requirement for CIL and s106 agreements these will be made in accordance with Wealden District Council's adopted guidance or any subsequent updates to this.

Monies payable to the Town Council will be used to deliver projects outlined in the Neighbourhood Plan at Projects AT1, GS1, TC1, TC2

The Town Council will liaise with the District Council and Hellingly Parish Council to agree how the neighbourhood portion of CIL should best be spent arising from those growth areas where development has a cross boundary impact.

14. Next Steps



All consultation comments received in response to the 'Regulation 14' draft of Neighbourhood Plan were considered and amendments made as appropriate. The Plan has now been submitted to Wealden District Council to commence the examination process. This submission version of the Plan is supported by a Basic Conditions Statement, outlining how the Plan is in general conformity with strategic policies in the Local Plan, as well as a Consultation Statement, outlining the engagement activities undertaken and how these have informed the Neighbourhood Plan.

As part of the submission and examination process Wealden District Council will consult on the plan for a period of six weeks and then appoint an independent Inspector to examine the Plan. The examination may take the form of written representations or a formal hearing.

The inspector will consider the Plan and all material in front of them and recommend whether it should proceed to referendum or not. If they recommend that it proceeds to referendum, then everyone of voting age residing in the Parish will be entitled to cast a vote saying whether they are in favour of the Plan being 'made': meaning that it becomes part of the formal suite of planning policies in force in Wealden and thus used to shape and determine future applications for development in Hailsham.

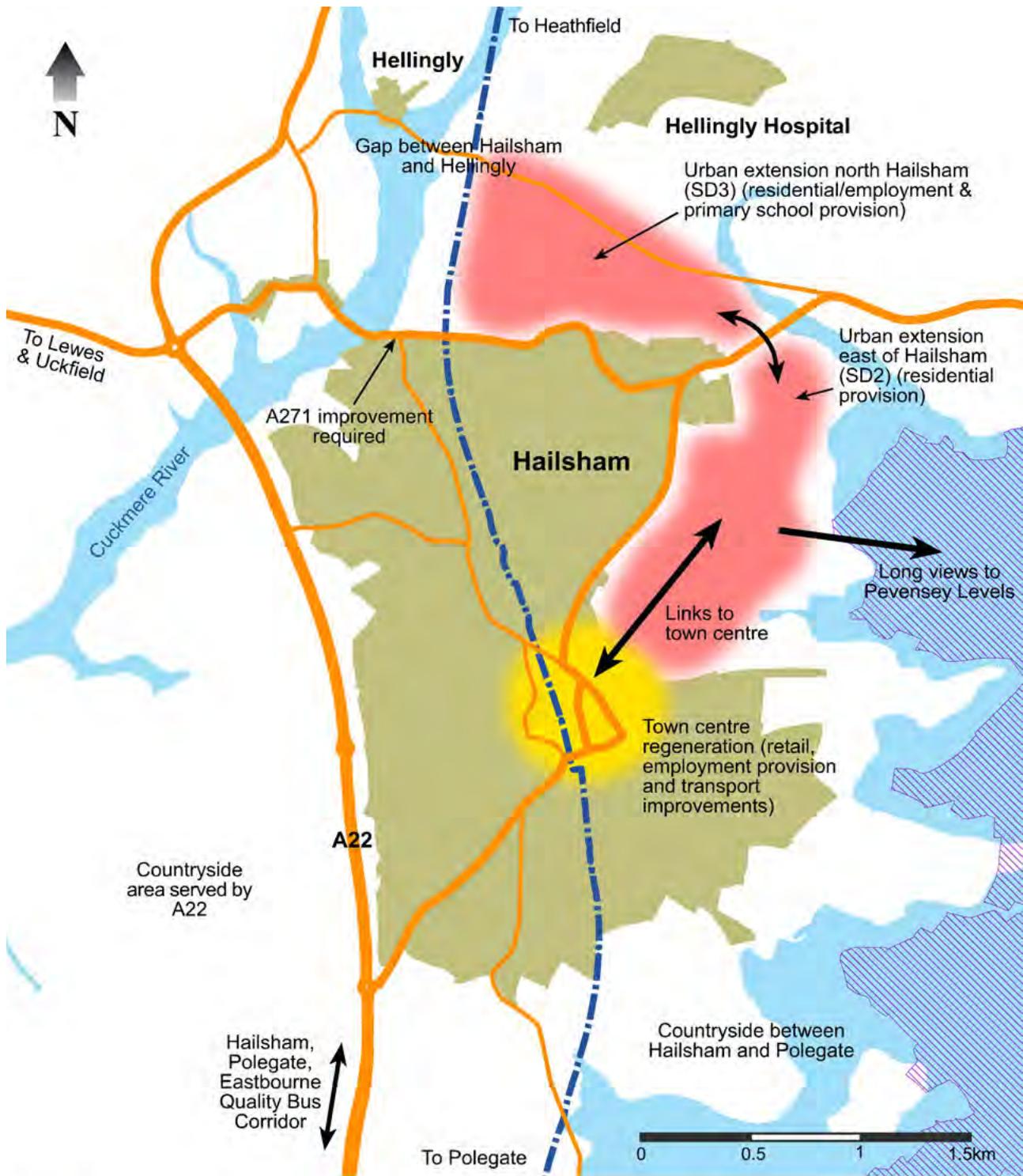
If the Plan is successfully 'made' the Town Council will monitor the effectiveness of the policies and use of CIL funds to deliver projects. In time, updates to the plan may be consulted upon to ensure that it remains up to date and relevant. This includes a commitment to reviewing the Plan and updating it as necessary as and when the new Wealden Local Plan is adopted.

Appendix A: Development Plan Proposals Maps



The following pages include:

- Adopted Wealden Core Strategy Proposal Map: Hailsham extract
- Submission Wealden Local Plan (January 2019) Proposals Map, Hailsham Extract
- Submission Wealden Local Plan (January 2019) Hailsham Town Centre opportunities plan



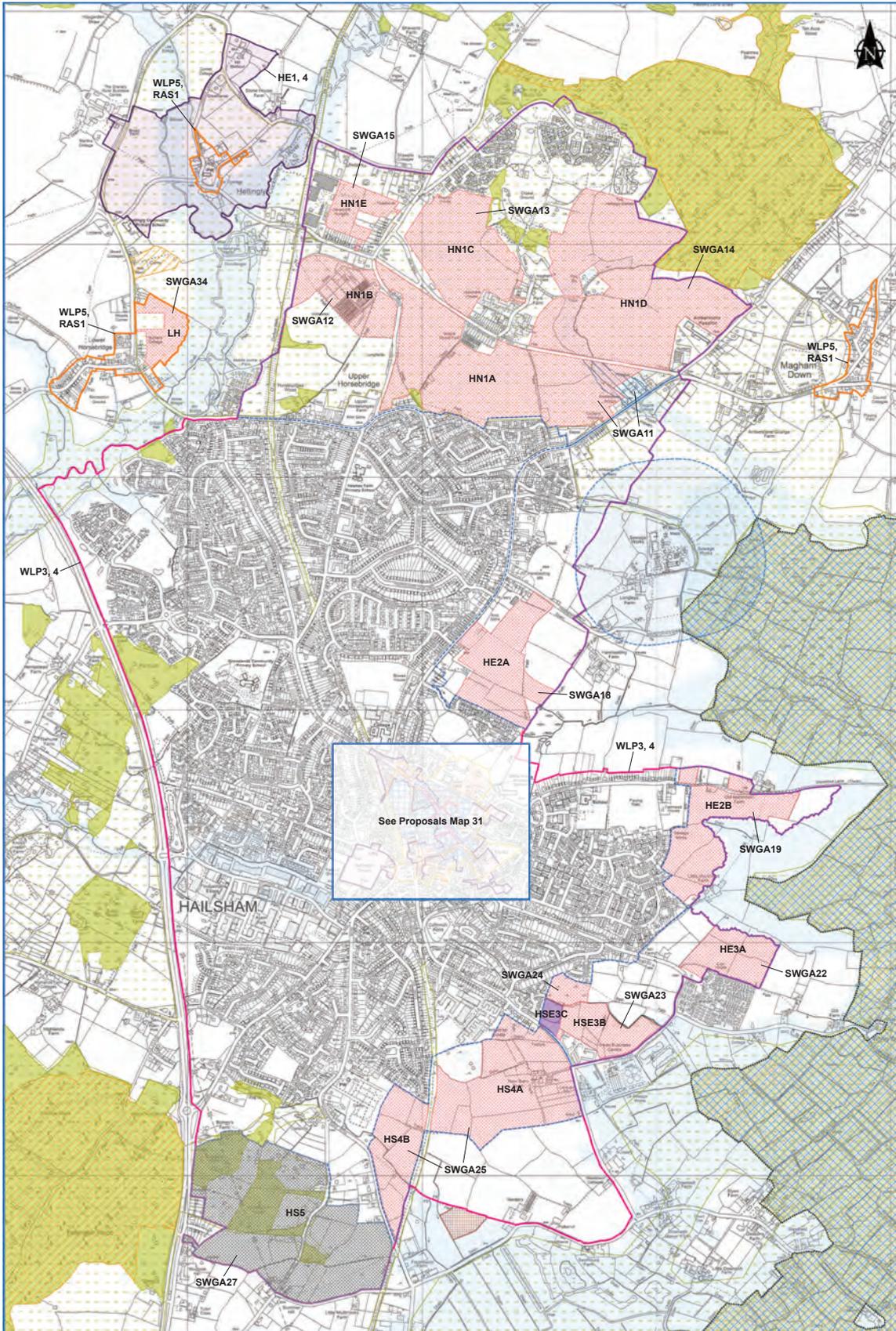
Key

- Urban Area
- Area at risk from flooding
- Pevensey Levels RAMSAR Site

Cuckoo Trail (cycle and walking points)

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Figure 22: Adopted Wealden Core Strategy, Hailsham extract



Key

- Flood Zone 2 and high central climate change
- Ancient Woodland
- Biodiversity Opportunity Areas
- Local Wildlife Site
- Special Area of Conservation (SAC)
- Ramsar Site
- Sites of Special Scientific Interest (SSSI)
- Environmental Mitigation Zone
- Scheduled Ancient Monument
- Odour Mitigation Zone
- Conservation Area
- Gypsy and Traveller Allocation
- Development Allocation
- Development Boundary
- Development Sectors
- Core Area
- Land associated with Policy SWGA 27, 28
- Proposals Map boundary

This map does not identify specific open space areas. However, the Council is seeking to protect the following types of space: Allotments, Amenity Green Space, Parks and Recreational Grounds, Children's Play Space, Youth Play Space, Natural Green Space and Outdoor Sports Space.

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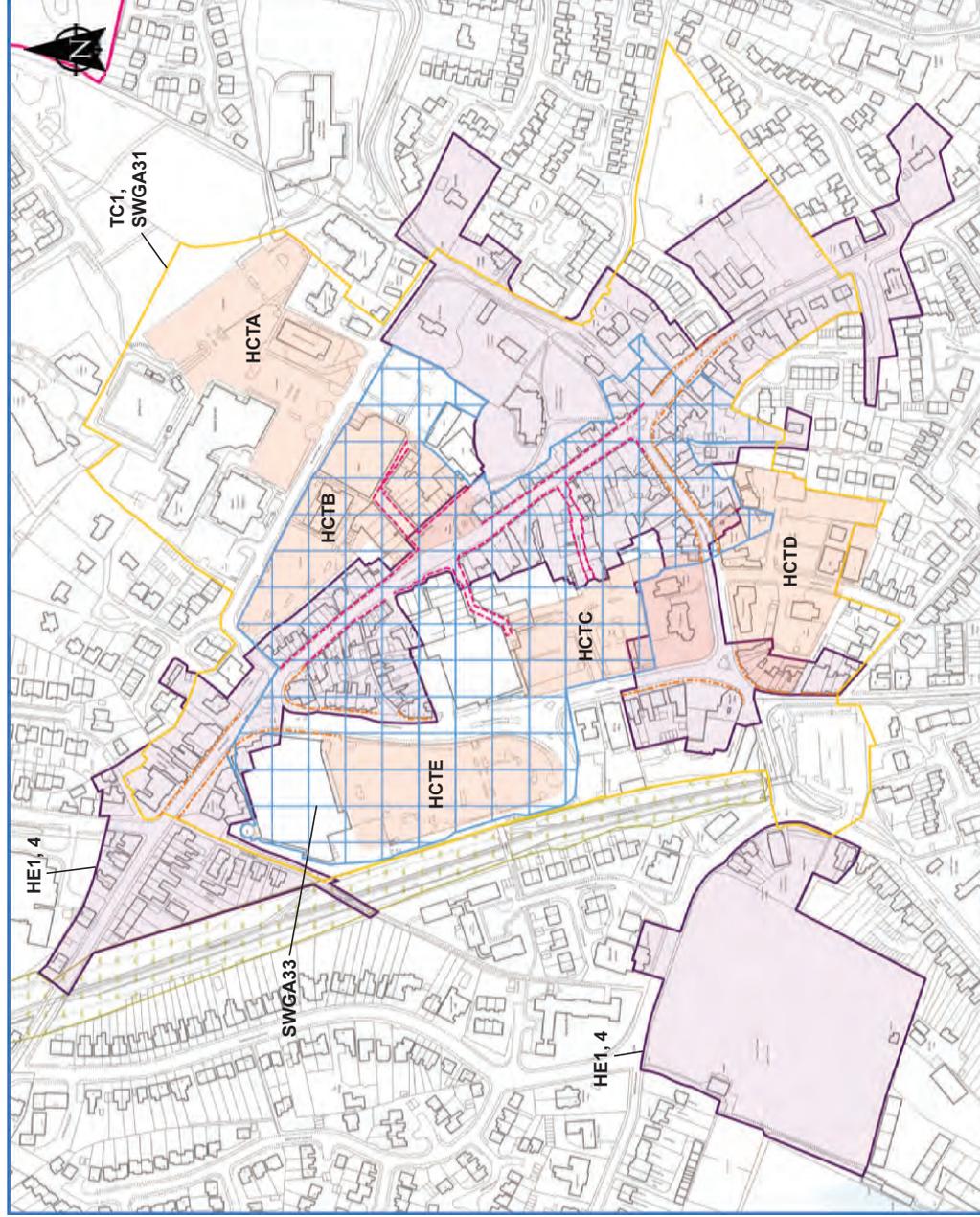
 250 Metres

 Scale 1:10,000 @ A1

 Wealden Local Plan January 2019

Figure 23: Submission Wealden Local Plan proposals map, Hailsham extract

Proposals Map 31 Hailsham Town Centre



Key

-  Flood Zone 2 and high central climate change
-  Biodiversity Opportunity Areas
-  Conservation Area
-  Primary Shopping Area
-  Town Centre Area
-  Primary Shopping Frontage
-  Secondary Shopping Frontage
-  Retail Allocations
-  Development Boundary
-  Proposals Map boundary

This map does not identify specific open space areas. However, the Council is seeking to protect the following types of space: Allotments, Amenity Green Space, Parks and Recreational Grounds, Children's Play Space, Youth Play Space, Natural Green Space and Outdoor Sports Space.

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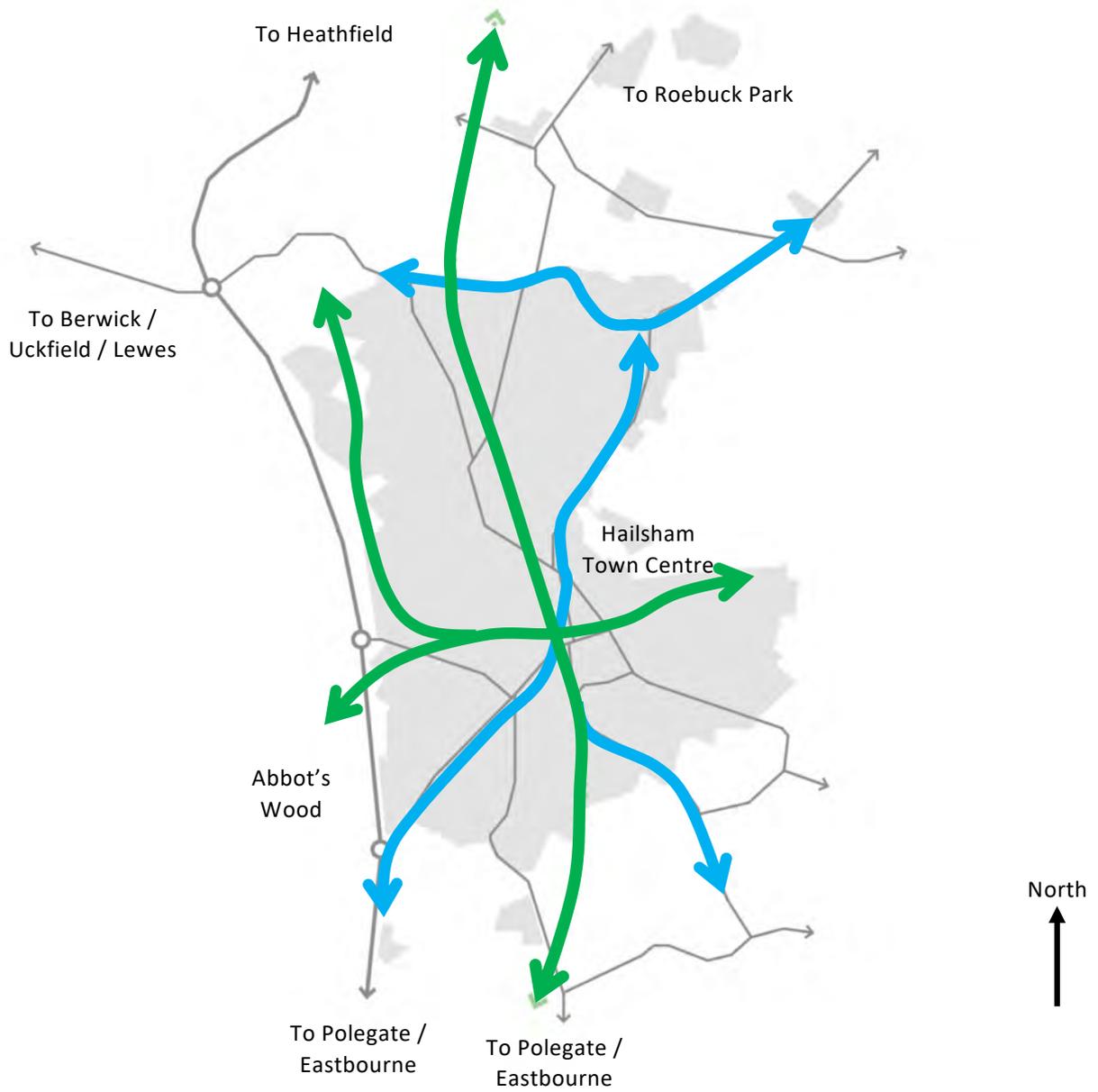
100 Metres
Scale 1:3000 @ A3
Wealden Local Plan January 2019

Figure 24: Submission Wealden Local Plan, Hailsham Town Centre inset plan

Appendix B: Possible Future Hailsham Cycle Network



The plan overleaf illustrates a town-wide concept cycle network, showing improved east west and north south connections between the town centre, residential areas and other key uses and facilities. These main routes should be supplemented by a linked network of local cycle connections, providing for safe cycling across Hailsham.



- Dedicated on road cycle routes, with segregation and safe junctions
 - Green cycle network, comprising dedicated off road routes and linking parks and green spaces
- Main routes supplemented by a linked network of local cycle routes**

Figure 25: Illustrative potential future Hailsham cycle network, based on a 'hub and spoke' approach of main routes, supported by local connections

Appendix C: Glossary



Adoption – The final confirmation of a development plan by a local planning authority. The equivalent terminology for a Neighbourhood Plan is that the document is ‘made’, rather than ‘adopted’.

Community Infrastructure Levy (CIL) - allows Local Authorities to raise funds from developers undertaking new building projects in their area. Money can be used to fund a wide range of infrastructure such as transport schemes, schools, health centres, leisure centres and parks. Parishes with a ‘made’ Neighbourhood Plan will receive 25% of any Community Infrastructure Levy arising from developments in their area compared to parishes without a Neighbourhood Plan who will receive 15%.

Conservation Area - an area of special architectural or historic interest, the character or appearance of which is preserved by local planning policies and guidance.

Department for Communities and Local Government – See Ministry of Housing, Communities and Local Government

Design Code – A set of illustrated design rules and requirements which instruct and may advise on the physical development of a site or area. The graphic and written components of the code are detailed and precise, and build upon a design vision such as a masterplan or other design and development framework for a site or area.

Development Plan - Includes the adopted Wealden District Core Strategy (and any future adopted Local Plan which may replace it) and Neighbourhood Development Plans which are used to determine planning applications.

Evidence base - The background information that any Development Plan Document is based on and is made up of studies on specific issues, such as housing need for example.

Greenfield site - Land where there has been no previous development, often in agricultural use

Green-space - Those parts of an area which are occupied by natural open space, parkland, woodland, sports fields, gardens, allotments and the like.

Independent Examination - An assessment of a proposed Neighbourhood Plan carried out by an independent person to consider whether a Neighbourhood Development Plan conforms with the relevant legal requirements.

Infrastructure – Basic services necessary for development to take place, for example, roads, electricity, sewerage, water, education and health facilities.

Infill Development – small scale development filling a gap within an otherwise built up frontage.

Listed Building – building of special architectural or historic interest.

Local Planning Authority - Local government body responsible for formulating planning policies and controlling development; a district council, metropolitan council, county council, a unitary authority or national park authority. For Hailsham, this is Wealden District Council and East Sussex County Council.

Ministry of Housing, Communities and Local Government - is the Government department with responsibility for planning, housing, urban regeneration and local government (MHCLG). Previously known as the Department for Communities and Local Government (DCLG).

National Planning Policy Framework (NPPF) – The National Planning Policy Framework sets out the Government’s planning policies for England and how these are expected to be applied.

Neighbourhood Development Plan – A local plan prepared by a Town or Parish Council for a particular Neighbourhood Area, which includes land use topics.

Planning Permission - Formal approval granted by a Council (e.g. Wealden District Council) in allowing a proposed development to proceed.

Planning Practice Guidance – Planning Practice Guidance adds further context to the National Planning Policy Framework (NPPF) and it is intended that the two documents should be read together.

Previously Developed Land - Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.

Public Open Space - Open space to which the public has free access.

Ramsar Site – The Ramsar Convention on Wetlands of International Importance especially as Waterfowl Habitat is an international treaty for the conservation and sustainable use of wetlands. It is also known as the Convention on Wetlands. The Pevensey Levels is a Ramsar Site.

Section 106 Agreement – Planning obligation under Section 106 of the Town & Country Planning Act 1990, secured by a local planning authority through negotiations with a developer to offset the public cost of permitting a development proposal.

Settlement Development Boundary – Also referred to as the extent of the built-up area, settlement or development boundaries seek to set clear limits to towns and villages. They are designed to define the existing settlement and to identify areas of land where development may be acceptable in principle, subject to other policies and material planning considerations.

Site of Special Scientific Interest (SSSI) – A conservation designation denoting a protected area in the United Kingdom

Soundness – The soundness of a statutory local planning document is determined by the planning inspector against three criteria: whether the plan is justified (founded on robust

and credible evidence and be the most appropriate strategy), whether the plan is effective (deliverable, flexible and able to be monitored), and whether it is consistent with national and local planning policy.

Special Area of Conservation (SAC) – Defined in the European Union’s Habitats Directive (92/43/EEC), also known as the Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora. SACs complement Special Protection Areas and together form a network of protected sites across the European Union called Natura 2000.

Special Protection Area (SPA) – A designation under the European Union Directive on the Conservation of Wild Birds. Under the Directive, Member States of the European Union (EU) have a duty to safeguard the habitats of migratory birds and certain particularly threatened birds.

Stakeholder – People who have an interest in an organisation or process including residents, business owners and national organisations and government departments.

Sustainable Communities – Places where people want to live and work, now and in the future.

Sustainable Development – An approach to development that aims to allow economic growth without damaging the environment or natural resources. Development that meets the needs of the present without compromising the ability of future generations to meet their own needs.

Use Classes Order – The Town and Country Planning (Use Classes) Order 1987(as amended) is the statutory instrument that defines the categories of use of buildings or land for the purposes of planning legislation. Planning permission must be obtained to change the use of a building or land to another class.

Appendix D: Acknowledgements



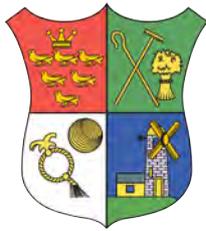
Hailsham Town Council would like to thank everyone who participated in consultation and engagement events to help shape and inform the Neighbourhood Plan.

We are also grateful to members of the Neighbourhood Planning Steering Group, comprising both Council Members and Residents, who have committed their time, energy and passion to preparing the Neighbourhood Plan and helping to shape a better future for Hailsham.

We would also like to thank consultancy Troy Planning + Design (www.troyplanning.com) for their help in facilitating events, for the development of ideas and concepts that communicate the views of the community and translate these into a planning policy document.

*“Make big plans, aim high in hope and work...
let your watchword be order and your beacon
beauty.”*

Daniel Burnham



Hailsham Neighbourhood Plan
Submission version: March 2019

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Hailsham Neighbourhood Plan

Scoping Report for Sustainability Appraisal (incorporating Strategic Environmental Assessment)

Prepared by LUC
November 2018

Project Title: Scoping Report for Sustainability Appraisal (incorporating Strategic Environmental Assessment) of the Hailsham Neighbourhood Plan

Client: Hailsham Town Council

Version	Date	Version Details	Prepared by	Checked by	Approved by
1	25 OCTOBER 2018	Draft for client comment	Stuart Langer Calum McCulloch Olivia Dunham Lauren Ielden Sarah Smith	Jon Pearson	Philip Smith
2	7 NOVEMBER 2018	Final for consultation	Sarah Smith	Philip Smith	Philip Smith



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Hailsham Neighbourhood Plan

Scoping Report for Sustainability Appraisal (incorporating Strategic Environmental Assessment) of the Hailsham Neighbourhood Plan

Prepared by LUC
November 2018

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1 Introduction

- 1.1 Hailsham Town Council is preparing a Neighbourhood Plan which provides policies and aspirations for the future development of the town of Hailsham, Wealden. LUC has been commissioned to undertake a Sustainability Appraisal (SA) of the Neighbourhood Plan (incorporating the requirements of Strategic Environmental Assessment - SEA).
- 1.2 Hailsham is in Wealden District. Wealden District Council (WDC) will be responsible for 'making' the Neighbourhood Plan, i.e. adopting the plan as part of the statutory development plan. In October 2018 Wealden District Council adopted a positive screening opinion, stating that Strategic Environmental Assessment will be required for the Hailsham Neighbourhood Plan (see below).
- 1.3 The purpose of this Scoping Report is to provide the context for, and determine the scope of, the SA. This report therefore forms the first part of the SA process – determining whether significant effects are likely and setting out the framework for how these will be assessed.
- 1.1 The Scoping Report starts by setting out the policy context of the emerging Hailsham Neighbourhood Plan, before describing the current and likely future environmental, social and economic conditions in the area. This contextual information is used to identify the key sustainability issues and opportunities that the new Neighbourhood Plan can address. The key sustainability issues and opportunities are then used to develop a framework of SA Objectives against which the likely significant effects of the Neighbourhood Plan will be assessed.
- 1.2 This report will be subject to consultation with the relevant environmental bodies. The purpose of this consultation is to seek views on the proposed scope and level of detail of the SA. The particular issues on which views are sought are set out in Chapter 5.

SEA Screening

- 1.3 As set out in the Planning Practice Guidance (PPG), SEA is only required for Neighbourhood Plans where a plan is considered likely to have significant environmental effects. The process of deciding whether a plan is likely to have significant environmental effects is referred to as 'screening' and the requirements of this are set out in regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations)¹. This includes a requirement to consult the environmental assessment consultation bodies (Environment Agency, Natural England and Historic England).
- 1.4 Wealden District Council undertook a screening exercise to determine whether the Hailsham Neighbourhood Plan should be subject to SEA. This was subject to consultation with the statutory consultees (Environment Agency, Natural England and Historic England). The final SEA Screening Opinion was issued by WDC to Hailsham Town Council in a letter dated 9th October 2018. The SEA Screening Opinion concluded that '*the Neighbourhood Plan in its current form may result in a likely significant environmental effect and therefore an SEA will be required*'. WDC recommended that SEA should be undertaken as part of a Sustainability Appraisal, which considers reasonable alternatives to the draft policies in the Neighbourhood Plan. The PPG (Reference ID: 11-026-20140306) clarifies that there is no legal requirement to undertake SA for a Neighbourhood Plan, but that SA may be a useful approach for demonstrating how the Plan will contribute to achieving sustainable development.
- 1.5 The Screening Opinion suggests that the primary likely significant effects of the Neighbourhood Plan are expected to arise in relation to the internationally designated biodiversity sites (referred to as 'European sites') within and near to the Neighbourhood Plan area. The effects of a plan on European sites are assessed through a process known as Habitats Regulations Assessment (HRA), which is discussed in more detail below. As explained in the PPG (Reference ID: 11-047-

¹ MHCLG (2018) Planning Practice Guidance, Strategic environmental assessment requirements for neighbourhood plans. Available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal#strategic-environmental-assessment-requirements-for-neighbourhood-plans>. Accessed: 19/10/18

20150209), if a plan requires an appropriate assessment under the Habitats directive then it will normally also require SEA.

- 1.6 Aside from effects on European sites, this Scoping Report considers which other types of environmental, social and economic effects that could arise as a result of the Neighbourhood Plan. The SA will also consider potential effects on European sites and will draw on the HRA in order to do this, as necessary.
- 1.7 The Screening Opinion also identifies potential effects on cultural heritage assets, the hydrological regime and water quality and other features of the natural environment.

Habitats Regulations Assessment

- 1.8 The requirement to undertake HRA of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in July 2007 and updated in 2010² and again in 2012³ and 2017⁴. The regulations translate Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive) and 79/409/EEC (Birds Directive) into UK law. The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European Site and to ascertain whether it would adversely affect the integrity of that site.
- 1.9 Wealden District Council undertook a screening exercise to determine whether the Hailsham Neighbourhood Plan should be subject to HRA, alongside the SEA screening. This was subject to consultation with Natural England, as the statutory consultee. The final Screening Opinion was issued by WDC to Hailsham Town Council in a letter dated 9th October 2018. The Screening Opinion concluded that '*a number of draft planning policies within the Hailsham NDP have been identified as leading to a 'likely significant effect' on the European or international sites considered*', therefore Appropriate Assessment (a stage of HRA) is required. In particular, the HRA Screening identified the following potential significant effects, which will be considered further through the HRA:
 - Increased atmospheric pollution at Ashdown Forest SAC, Lewes Downs SAC, Pevensey Levels SAC/Ramsar site.
 - Multiple effects of urbanisation at Ashdown Forest SPA/SAC.
 - Increased recreational pressure at Ashdown Forest SPA and Pevensey Levels SAC/Ramsar site.
 - Altered hydrological regime at Pevensey Levels SAC/Ramsar site.
 - Decreased water quality at Pevensey Levels SAC/Ramsar site.
- 1.10 An Appropriate Assessment of the Hailsham Neighbourhood Plan is being undertaken by Wealden District Council. Although this is not yet published, the findings of this will be taken into account in the SA where relevant (for example to inform judgements about the likely effects of policies on biodiversity).

The Hailsham area

- 1.11 The Hailsham Neighbourhood Plan covers the market town and parish of Hailsham, in Wealden District. The town is the largest of the five main towns within Wealden, with a population of approximately 24,600⁵.
- 1.12 The town is located approximately 5 km north of Polegate and 15 km north of Eastbourne, which is the nearest large town. These towns were previously connected to each other by rail, though

² The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2007. HMSO Statutory Instrument 2007 No. 1843. From 1 April 2010, these were consolidated and replaced by the Conservation of Habitats and Species Regulations 2010 (SI No. 2010/490). Note that no substantive changes to existing policies or procedures have been made in the new version. [accessed 31.08.2018]

³ The Conservation of Habitats and Species (Amendment) Regulations 2012. Statutory Instrument 2012 No. 1927. [accessed 31.08.2018]

⁴ *The Conservation of Habitats and Species Regulations 2017* (Statutory Instrument 2017 No. 1012) consolidate the Conservation of Habitats and Species Regulations 2010 with subsequent amendments. [accessed 31.08.2018]

⁵ 2014 ONS mid-year estimates

the route through Hailsham was removed as a result of the Beeching report. Main road connections to and from the town comprise the A22 and A27, which connect to Polegate and Eastbourne to the south and Crawley, Horsham and Brighton to the west.

- 1.13 The town sits amongst the lowland forests and marshes of the Sussex Weald and is a gateway to the South Downs National Park. Close to the town is the Pevensy Levels: a low-lying wetland of national and international conservation importance. It is designated as a Site of Special Scientific Interest, a national nature reserve, a Ramsar Site, and Special Area of Conservation. It comprises an extensive drainage network and is vulnerable to the effects of climate change and eutrophication.
- 1.14 The town has experienced significant expansion since 1945, and while the town centre, which includes 29 listed buildings, provides the focus for the social and commercial uses, there are large areas of mostly residential development within the town.
- 1.15 A key sustainable travel link is provided by the Cuckoo Trail. This 14 mile long trail along the former railway line links Heathfield to Eastbourne Park, running north to south through Hailsham. Further context and background information about the Hailsham area is set out in **Chapter 3** of this report.

The Hailsham Neighbourhood Plan

- 1.16 The Hailsham Neighbourhood Plan is being prepared to set out the local community's aspirations for Hailsham over the period to 2028 in relation to land use and development. Its policies will influence future planning applications and decisions in the area.
- 1.17 It is not currently envisaged that the Plan will allocate specific areas for development, but rather that this will be undertaken by WDC through the Wealden Local Plan. Instead, the Neighbourhood Plan seeks to manage new development to ensure a higher quality of development in the town than has been achieved in the past.
- 1.18 It is envisaged that the Plan will focus on better design of built development form, reducing the reliance on the private car, enhancing sustainable transport links, improving the town centre and helping to mitigate impacts of new development on the natural and historic environment. The Plan will also set out the Town Council's ambitions in relation to Community Infrastructure Levy (CIL) funding.
- 1.19 A draft version of the Plan was subject to a formal eight-week consultation period (Regulation 14), which ran from 25th November 2017 and 26th January 2018. Comments and responses received through that process, from residents, businesses, statutory consultees and others, were reviewed and informed the Submission version of the Plan (April 2018), to which this SA relates.
- 1.20 The Submission version of the Plan was adopted by the Town Council in April 2018, but has not yet been made as part of Wealden's statutory development plan. This was primarily due to a change in case law regarding Habitats Regulations Assessment (HRA), which prompted a revised screening of the Hailsham Neighbourhood Plan in terms of both HRA and SA.

Sustainability Appraisal (incorporating Strategic Environmental Assessment)

- 1.21 SA is designed to ensure that the plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process involves appraising the likely social, environmental and economic effects of the policies and proposals within a plan from the outset of its development.
- 1.22 The National Planning Policy Framework (NPPF) states that:
"Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. 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)".

- 1.23 SEA is also a statutory assessment process, required under the SEA Directive⁶, transposed in the UK by the SEA Regulations (Statutory Instrument 2004, No 1633). The SEA Regulations require the formal assessment of plans and programmes which are likely to have significant effects on the environment and which set the framework for future consent of projects requiring Environmental Impact Assessment (EIA)⁷. The purpose of SEA, as defined in Article 1 of the SEA Directive is 'to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans....with a view to promoting sustainable development'.
- 1.24 SEA and SA are separate processes but have similar aims and objectives. Simply put, SEA focuses on the likely environmental effects of a plan whilst SA includes a wider range of considerations, extending to social and economic impacts. National Planning Practice Guidance⁸ shows how it is possible to satisfy both requirements by undertaking a joint SA/SEA process, and to present an SA report that incorporates the requirements of the SEA Regulations.
- 1.25 In accordance with the instructions of Hailsham Town Council and taking account of the NPPF and positive screening opinion issued by Wealden District Council, the SA/SEA of the Hailsham Neighbourhood Plan is to be undertaken using the joint approach set out above. Throughout this report the abbreviation 'SA' should therefore be taken to refer to 'Sustainability Appraisal incorporating the requirements of Strategic Environmental Assessment'.

Approach to Sustainability Appraisal scoping

- 1.26 The SA process comprises a number of stages, with scoping being Stage A as shown in **Figure 1.1**:

Figure 1.1: Main stages of SA

Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope
Stage B: Developing and refining options and assessing effects
Stage C: Preparing the Sustainability Appraisal (SA) Report
Stage D: Consulting on the preferred options for the Neighbourhood Plan and the SA report
Stage E: Monitoring the significant effects of implementing the Neighbourhood Plan.

- 1.27 **Figure 1.2** sets out the tasks involved in the Scoping stage.

Figure 1.2: Stages in SA scoping (Stage A)

A1: Identifying relevant policies, plans and programmes, and environmental objectives.
A2: Collecting baseline information.
A3: Identifying sustainability issues and problems.
A4: Developing the Sustainability Appraisal (SA) framework
A5: Consulting on the scope of the SA.

Meeting the requirements of the SEA Regulations

- 1.28 This Scoping Report includes some of the required elements of the final 'Environmental Report' (the output required by the SEA Regulations). Table 1.1 signposts the relevant sections of this Scoping Report that are considered to meet the SEA Regulations requirements; the remainder will

⁶ SEA Directive 2001/42/EC

⁷ Under EU Directives 85/337/EEC and 97/11/EC concerning EIA.

⁸ <http://planningguidance.planningportal.gov.uk/>

be met during subsequent stages of the SA of the Hailsham Neighbourhood Plan. This table will be included in the SA Report at each stage of the SA to show how the SEA Regulations' requirements have been met through the SA process.

Table 1.1: Meeting the Requirements of the SEA Regulations

SEA Regulations' Requirements	Covered in this Scoping Report?
Environmental Report	
<p>Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs (2) and (3) of this regulation. The report shall identify, describe and evaluate the likely significant effects on the environment of:</p> <p>(a) implementing the plan or programme; and</p> <p>(b) reasonable alternatives taking into account the objectives and geographical scope of the plan or programme.</p> <p>(Regulation 12(1) and (2) and Schedule 2).</p>	<p>The full SA/SEA Report for the Hailsham Neighbourhood Plan will constitute the 'environmental report', and will be produced at a later stage in the SA/SEA process.</p>
<p>1) An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.</p>	<p>Chapters 1 and 2 and Appendix 1.</p>
<p>2) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.</p>	<p>Chapter 3.</p>
<p>3) The environmental characteristics of areas likely to be significantly affected.</p>	<p>Chapter 3.</p>
<p>4) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC on the conservation of wild birds and the Habitats Directive.</p>	<p>Chapter 3.</p>
<p>5) The environmental protection, objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation.</p>	<p>Chapter 2 and Appendix 1.</p>
<p>6) The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive effects, and secondary, cumulative and synergistic effects, on issues such as:</p> <p>(a) biodiversity;</p> <p>(b) population;</p> <p>(c) human health;</p> <p>(d) fauna;</p> <p>(e) flora;</p> <p>(f) soil;</p> <p>(g) water;</p> <p>(h) air;</p> <p>(i) climatic factors;</p> <p>(j) material assets;</p> <p>(k) cultural heritage, including architectural and archaeological heritage;</p>	<p>Requirement will be met at a later stage in the SEA process.</p>

SEA Regulations' Requirements	Covered in this Scoping Report?
(l) landscape; and (m) the interrelationship between the issues referred to in subparagraphs (a) to (l).	
7) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Requirement will be met at a later stage in the SEA process.
8) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Requirement will be met at a later stage in the SEA process.
9) A description of the measures envisaged concerning monitoring in accordance with regulation 17.	Requirement will be met at a later stage in the SEA process.
10) A non-technical summary of the information provided under paragraphs 1 to 9.	Requirement will be met at a later stage in the SEA process.
The report shall include such of the information referred to in Schedule 2 to these Regulations as may reasonably be required, taking account of: (a) current knowledge and methods of assessment; (b) the contents and level of detail in the plan or programme; the stage of the plan or programme in the decision-making process; and (c) the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment. (Regulation 12 (3))	This Scoping Report and the Environmental Reports will adhere to this requirement.
Consultation	
When deciding on the scope and level of detail of the information that must be included in the environmental report, the responsible authority shall consult the consultation bodies. (Regulation 12(5))	Consultation with the relevant statutory environmental bodies will be undertaken for a five week period from 7 th November 2018.
Every draft plan or programme for which an environmental report has been prepared in accordance with regulation 12 and its accompanying report ("the relevant documents") shall be made available for the purposes of consultation in accordance with the following provisions of this regulation. As soon as reasonable practical after the preparation of the relevant documents, the responsible authority shall: (a) send a copy of those documents to each consultation body; (b) take such steps as it considers appropriate to bring the preparation of the relevant documents to the attention of the persons who, in the authority's opinion, are affected or likely to be affected by, or have an interest in the decisions involved in the assessment and adoption of the plan or programme concerned, required under the Environmental assessment of Plans and Programmes Directive ("the public consultees"); (c) inform the public consultees of the address (which may include a website) at which a copy of the relevant documents may be	Previous consultations on the Neighbourhood Plan are available to view online at https://www.hailsham-tc.gov.uk/neighbourhood-planning/ The final version of the Neighbourhood Plan, along with the full SA Report will be consulted on prior to submission.

SEA Regulations' Requirements	Covered in this Scoping Report?
<p>viewed, and the period within which, opinions must be sent.</p> <p>The period referred to in paragraph (2)(d) must be of such length as will ensure that the consultation bodies and the public consultees are given an effective opportunity to express their opinion on the relevant documents.</p> <p>(Regulation 13 (1), (2), and (3))</p>	
<p>Where a responsible authority, other than the Secretary of State, is of the opinion that a plan or programme for which it is the responsible is likely to have significant effects on the environment of another Member State, it shall, as soon as reasonable practicable after forming that opinion:</p> <p>(a) notify the Secretary of State of its opinion and of the reasons for it; and</p> <p>(b) supply the Secretary of State with a copy of the plan or programme concerned, and of the accompanying environmental report.</p> <p>(Regulation 14 (1))</p>	<p>Not relevant as there will be no effects beyond the UK from the Hailsham Neighbourhood Plan.</p>
<p>Taking the environmental report and the results of the consultations into account in decision-making (relevant extracts of Regulation 16)</p>	
<p>As soon as reasonably practicable after the adoption of a plan or programme for which an environmental assessment has been carried out under these Regulations, the responsible authority shall:</p> <p>(a) make a copy of the plan or programme and its accompanying environmental report available at its principal office for inspection by the public at all reasonable times and free of charge.</p> <p>(Regulation 16(1))</p>	<p>Requirement will be met at a later stage in the SEA process.</p>
<p>As soon as reasonably practicable after the adoption of a plan or programme:</p> <p>(a) the responsible authority shall inform (i) the consultation bodies; (ii) the persons who, in relation to the plan or programme, were public consultees for the purposes of regulation 13; and (iii) where the responsible authority is not the Secretary of state, the Secretary of State, that the plan or programme has been adopted, and a statement containing the following particulars:</p> <p>(a) how environmental considerations have been integrated into the plan or programme;</p> <p>(b) how the environmental report has been taken into account;</p> <p>(c) how opinions expressed in response to: (i) the invitation in regulation 13(2)(d); (ii) action taken by the responsibility in accordance with regulation 13(4), have been taken into account;</p> <p>(d) how the results of any consultations entered into under regulation 14(4) have been taken into account;</p> <p>(e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</p> <p>(f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.</p>	<p>Requirement will be met at a later stage in the SEA process.</p>
<p>Monitoring</p>	
<p>The responsible authority shall monitor the significant effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.</p> <p>(Regulation 17(1))</p>	<p>Requirement will be met at a later stage in the SEA process.</p>

Structure of this Scoping Report

- 1.29 This chapter has described the background to the production of the Hailsham Neighbourhood Plan and the requirement to undertake SA.
- 1.30 **Chapter 2** gives an overview of the other plans and programmes that are relevant to the Hailsham Neighbourhood Plan.
- 1.31 **Chapter 3** sets out the baseline for each SA topic area, including the likely evolution of this without the Plan in place. This chapter also sets out the key sustainability issues relating to each topic area.
- 1.32 **Chapter 4** sets out the SA framework and explains how this has been developed.
- 1.33 **Chapter 5** sets out the conclusions of the SA Scoping and sets out the next steps for the SA process.
- 1.34 SA guidance recognises that data gaps will exist, but suggests that where baseline information is unavailable or unsatisfactory, authorities should consider how it will affect their assessments and determine how to improve it for use in the assessment of future plans. Where there are data gaps in the baseline and forthcoming reports, these are highlighted in the text. The collection and analysis of baseline data is regarded as a continual and evolving process, given that information can change or be updated on a regular basis. Relevant baseline information will be updated during the SA process as and when data is published.

2 Other relevant plans and programmes

2.1 Schedule 2 of the SEA Regulations requires the SA report to include:

(1) An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans or programmes.

(5) The environmental protection objectives established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation.

2.2 In order to establish a clear scope for the SA it is necessary to review and develop an understanding of the environmental objectives contained within international and national policies, plans and strategies that are of relevance to the Hailsham Neighbourhood Plan. Given the SA/SEA Regulations' requirements above, it is also necessary to consider the relationship between the Neighbourhood Plan and other relevant plans, policies and programmes.

Outline of the contents and main objectives of the Hailsham Neighbourhood Plan

2.3 The Hailsham Neighbourhood Plan will (once made) set out the aspirations, policies and projects of Hailsham Town Council in relation to the future development of Hailsham. As the Plan is a Neighbourhood Plan, it provides the most local-scale suite of planning requirements in combination with the district wide Wealden Local Plan, which is discussed below, and national planning policy within the National Planning Policy Framework.

2.4 The Hailsham Neighbourhood Plan seeks to manage certain aspects of new development to help ensure higher quality of built form is provided in the town in future. The key features of the vision of the Plan are as follows:

- Making Hailsham an attractive destination for leisure, shopping & culture.
- Creating a connected and expanded mixed retail area.
- Improved non-motorised transportation.
- Connected green spaces for a healthy community.

2.5 The objectives following from the vision are:

- Development delivers the necessary facilities and infrastructure in accessible locations for existing and new communities alike.
- Existing pedestrian and cycling routes are preserved and enhanced. The Cuckoo Trail will be improved as a multi-functional route for tourism, travel and recreation, further linking Hailsham to its surrounding communities.
- New developments will create well connected, attractive cycling and pedestrian routes, providing seamless integration with the existing urban areas and public green spaces to encourage a reduction in car based travel.
- Existing habitats and green infrastructure networks are protected and enhanced through sensitive development to encourage local habitat improvement and creation.
- The character and setting of Hailsham's conservation area, statutory listed buildings and locally listed buildings are protected by fostering a high-quality design approach which promotes design innovation and reinforces the distinct local character areas of Hailsham.
- Improve local air quality and provide reductions in carbon emissions by supporting local renewable energy generation.

- Encourage the appropriate re-development of previously developed land to help meet housing need and encourage the regeneration of Hailsham Town Centre.
- Protect and encourage the development of retail and commercial spaces which meet identified local need, to support new and existing small businesses and local retailers whilst also attracting inward investment into Hailsham.
- Support existing retailers in Hailsham and encourage a diversification of the retail and leisure offers in the town to attract new shoppers and visitors.

Relationship between the Hailsham Neighbourhood Plan and other relevant plans and programmes

Key international plans and programmes

- 2.6 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 the emerging Local Plan. These processes should be undertaken iteratively and integrated into the production of the Plan in order to ensure that any potential negative environmental effects (including on European-level nature conservation designations) are identified and can be mitigated.
- 2.7 There are a wide range of other EU Directives relating to issues such as water quality, waste and air quality, most of which have been transposed into UK law, however the international directives have been included in **Appendix 1** for completeness.

Key national plans and programmes

- 2.8 The Localism Act (2011) sought to move decision-making away from central government and towards local communities. Part of this included the introduction of Neighbourhood Planning.
- 2.9 Another significant development in terms of the policy context for the Neighbourhood Plan has been the publication of the National Planning Policy Framework (NPPF) which replaced the suite of Planning Policy Statements (PPSs) and Planning Policy Guidance (PPGs). The purpose of the NPPF was to streamline national planning policy. The Neighbourhood Plan must be consistent with the requirements of the NPPF. The NPPF sets out information about the purposes of Neighbourhood Plan-making, stating that:
- "Neighbourhood planning gives communities the power to develop a shared vision for their area."*
- 2.10 The NPPF also states that Neighbourhood Plans 'can shape, direct and help to deliver sustainable development'. This means that opportunities should be identified in order to achieve net gains in terms of sustainable social, environmental and economic development; however significant adverse impacts in any of those areas should not be allowed to occur.
- 2.11 The NPPF requires local planning authorities and communities to set out non-strategic priorities for the area in the Neighbourhood Plan. This could include policies to deliver:
- Site allocations for small and medium-sized housing.
 - The provision of infrastructure and community facilities at a local level.
 - Establishing design principles.
 - Conservation and enhancement of the natural and historic environment.

Key local plans and programmes

- 2.12 The current 'Development Plan' for Wealden District comprises the Wealden Core Strategy (2013), saved Local Plan policies (1998), the Affordable Housing Delivery Local Plan (2016) and the East Sussex County Council Waste and Minerals Plan (2017).

- 2.13 Wealden District Council are in the later stages of preparing a new Local Plan for the District, having recently finished consultation of the draft of the plan proposed to be submitted for Examination. Timings for Examination and proposed adoption of the plan are unknown.

Emerging Wealden Local Plan

- 2.14 The emerging Wealden Local Plan does not currently form part of the 'Development Plan', although does indicate the direction of travel for new growth and development. The emerging Local Plan is at 'Regulation 19 stage' and a submission version was published for consultation beginning 13th August 2018 and lasting until 8th October 2018. The Local Plan and the representations received will be submitted to the Planning Inspectorate for examination.
- 2.15 Section 14 of the emerging Wealden Local Plan relates solely to Hailsham. This part of the Local Plan allocates up to 2,672 homes to Hailsham, along with gypsy and traveller sites, employment land and strategic infrastructure to support these. The Neighbourhood Plan has been prepared to be in general conformity with the emerging Wealden Local Plan.

3 Baseline information

- 3.1 Baseline information provides the basis for predicting and monitoring the likely sustainability effects of a plan and helps to identify key sustainability issues and means of dealing with them.
- 3.2 Schedule 2 of the SEA Regulations requires information to be provided by the SA report on:
- (2) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan.*
- (3) The environmental characteristics of areas likely to be significantly affected.*
- (4) Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC on the conservation of wild birds and the Habitats Directive.*
- 3.3 Baseline information that was collated for the SA of the emerging Wealden Local Plan has been used as the starting point. However, where necessary, it has been revised and updated to make use of the most recent available information sources.
- 3.4 Data referred to have been chosen primarily for regularity and consistency of collection, in order to enable trends in the baseline situation to be established, and also subsequent monitoring of potential environmental effects.

Housing

- 3.5 In 2011, the Office for National Statistics (ONS) recorded 8,700 houses within Hailsham Parish⁹. The minority of housing stock is flatted development (11.8%) with a relatively even split of detached and semi-detached dwellings (31% and 35% respectively).
- 3.6 Terraced housing represents some 20% of housing stock, which is higher than the District average. Caravans and temporary structures account for 2.1% of the housing stock, which is also higher than the District average.
- 3.7 Hailsham has a higher proportion of 1, 2 and 3 bedroom dwellings than the Wealden average. The proportion of 1 bedroom dwellings is lower than the South East average, 3 bedrooms are lower than the South East average, and 4 bedroom and 5+ bedroom dwellings are lower than both the Wealden and South East average. 5.3% of housing stock in Hailsham has one less room than required, but a higher than average proportion of housing stock in Hailsham has the appropriate number of rooms or more. The proportion of one person households in Hailsham is above the Wealden average, but below the South East average. In 2016, the lower quartile house price in Wealden was £230,000¹⁰.
- 3.8 The Wealden Objectively Assessed Need paper (2017) calculates Wealden's housing need figure as being 1,233 dwellings per annum (or 18,500 dwellings over 2013-28)¹¹. The requirement for affordable housing in Wealden district is high at 331 affordable dwellings per annum.¹²

Key issues

- A significant amount of housing is needed within Wealden with around 2,672 of these homes allocated to Hailsham in the emerging Wealden Local Plan to 2028.

⁹ <https://www.nomisweb.co.uk/reports/localarea?compare=1170213711> [accessed 31.08.2018]

¹⁰ Information gathered from Emerging Wealden Local Plan

¹¹ Regeneris (2017). Wealden OAN Update Draft Paper: 2013-2028. A Draft Report by Regeneris Consulting

¹² Wealden District Local Plan: Proposed Submission

- Market housing is unaffordable for many residents in Wealden. As such, a suitable proportion newly built housing must be made affordable.
- High quality housing in a mix of types and styles is required to enhance local character and to meet Hailsham’s demographic needs, such as an ageing population.

Likely evolution without the Plan

- 3.9 Delivery of the required number of houses (including affordable homes) with a mix of housing types will, to a large extent, be delivered through policies within the Wealden District Local Plan. The Plan could help to ensure housing is of a sufficient type and quality to meet local needs.
- 3.10 **The effects of the Plan on housing have been scoped into of the SA, as the Plan could influence the type, mix and quality of housing.**

Education

- 3.11 In terms of the educational attainment of Hailsham’s existing residents, 24.5% do not have qualifications, with 19% with Level 4 highest level of qualification. This is higher than for Wealden district as a whole, in which 19.9% of the population have no qualifications and 28.9% have Level 4 and above qualifications.
- 3.12 The Infrastructure Delivery Plan prepared in support of the emerging Wealden Local Plan sets out that in Hailsham, primary school places are expected to be in shortfall by 60 places in 2019/2020. However, the Infrastructure Delivery Plan proposes to expand Hailsham Community College and increase the age range to deal with this shortfall. In the longer term, a further 420 primary places are anticipated to be required in the 2020s.
- 3.13 The Infrastructure Delivery Plan suggests that Hailsham Community College will be able to maintain a steady intake of pupils until 2022/23, from which point more capacity is likely to be required.
- 3.14 The Neighbourhood Plan itself recognises that access to education beyond the parish is limited by a lack of public transport.

Key issues

- Hailsham has a lower than average level of educational attainment than Wealden as a whole.
- Hailsham has a shortfall in primary school places available.
- Additional capacity within secondary schools is likely to be required after 2022.
- Lack of public transport may act as a barrier to accessing educational opportunities.

Likely evolution without the Plan

- 3.15 The Local Education Authority is responsible for securing the required number of school places, although the Wealden Local Plan can help to identify sites for new educational facilities and requirements for developers to contribute towards these. The Plan vision aims to provide new and improved educational opportunities through growth and could help to increase access to these.
- 3.16 **The effects of the Plan on education have been scoped into of the SA, as the Neighbourhood Plan could improve access to educational opportunities.**

Population

- 3.17 Hailsham is located approximately 5 km north of Polegate and 15 km north of Eastbourne, which is the nearest large town. The town has a population of approximately 24,600¹³ people within an area of 1,937 hectares. The town has expanded significantly since 1945.
- 3.18 Hailsham is made up of several lower super output areas (LSOAs). Hailsham South and West (Wealden 016D) is in the 20% most deprived LSOAs with regard to multiple deprivation and also with regard to income deprivation, Barriers to Housing and Services, Income Deprivation Affecting Children. This LSOA is in the 10% most deprived for employment deprivation, education skills and training¹⁴. Some 13% of Wealden households are classified as being in fuel poverty. Cold, damp homes impact on the health of the young and elderly.
- 3.19 Hailsham East (Wealden 017B) is also in the 20% most deprived LSOAs with regard to multiple deprivation, including specifically for income deprivation, Barriers to Housing and Services, Income Deprivation Affecting Older People. This LSOA is also in the 10% most deprived for employment deprivation, education skills and training.
- 3.20 Hailsham South and West (Wealden 017D) is amongst the 30% most deprived LSOAs in the country, within the 20% most deprived LSOAs for employment deprivation, and within the 10% most deprived LSOAs for education skills and training.
- 3.21 Comparatively, Hailsham has less crime than other parts of England. Hailsham South and West (Wealden 016C) is one of the most 40% deprived LSOAs for the crime domain and is the worst performing in the parish.
- 3.22 In 2011, ethnic diversity within Hailsham (and Wealden) was significantly lower than that generally found in England and Wales, with 97.6% of persons being 'white', compared to an England and Wales average of 86%¹⁵.
- 3.23 Wealden has a higher than national average proportion of older residents (25.7% aged 65 and over estimated by ONS 2016; compared to 17.8% for the UK (ONS, 2015)). In 2011, 47.3% of the population was male, compared to 49.2% in England and Wales¹⁶.

Key issues

- Hailsham contains areas with significant levels of deprivation, particularly with regards to income and employment, barriers to housing and services and education, skills and training.
- There are areas with comparatively higher levels of crime, notably in the west of the Hailsham urban area.
- Hailsham has an ageing population.

Likely evolution without the Plan

- 3.24 Population trends are likely to continue, including a rise in average age and associated age-related medical conditions, in line with the national trend of an ageing population. However, the Plan provides an opportunity to ensure development caters to the needs of an older population, which may otherwise be overlooked.
- 3.25 Levels of deprivation and crime are not expected to change significantly without the Plan in place, although the emerging Wealden Local Plan contains policies that could address these issues to some extent. The Plan could further encourage measures to reduce crime and deprivation.
- 3.26 **The effects of the Plan on population have been scoped into the SA as the Plan could provide polices that help to address deprivation and the needs of the ageing population in the Plan area.**

¹³ Draft Hailsham Neighbourhood Plan

¹⁴ Deprivation scores sourced from <http://dclqapps.communities.gov.uk/imd/idmap.html> [accessed 31.08.2018]

¹⁵ <http://eastsussexinfigures.org.uk/webview/welcome.html> [accessed 31.08.2018]

¹⁶ <http://eastsussexinfigures.org.uk/webview/welcome.html> [accessed 31.08.2018]

Health¹⁷

- 3.27 Life expectancy at birth for residents of Wealden is 81.7 years for males and 84.7 years for females. This is higher than the England averages (79.5 and 83.1 years) and slightly higher than averages for the South East region (80.6 and 84.0 years). However, life expectancy at birth in Hailsham (for both males and females combined) is lower than the national average, at least for Bethany House Surgery (76.6 years) and for Seaforth Farm Surgery (79.5 years)¹⁸. In 2012–2014, the absolute gap in life expectancy between the most and least deprived quintiles in Wealden was 3.2 years for males and 4.0 years for females. In both males and females circulatory diseases is the largest contributor to the gap (31% for males and 38% for females). Cancer contributes to a quarter of the gap for females (25%) and a fifth of the gap in males (19%). The risk increases for both these diseases for people who are overweight or obese.
- 3.28 The East Sussex Downs and Weald Primary Care Trust (ESD&W PCT) gives overviews of health for a number of 'localities'. The Hailsham Locality includes Hailsham and the surrounding area, including from Arlington in the west, to Boodle Street Green in the east. The Commentary for Hailsham Locality states that:
- Some 17% of reception year children are overweight or obese and 30% of year 6 children are overweight or obese. In ESD&W PCT 1 in 4 (25%) adults are estimated to be obese.
 - In ESD&W PCT it is estimated that 21% of adults smoke, including 19% of mothers smoking at time of delivery.
 - All-age all-cause mortality (age standardised) is significantly¹⁹ (9%) higher than expected compared to East Sussex. Bethany House Surgery has 86% higher mortality than expected, and it has the highest mortality of all practices in East Sussex. Seaforth Farm Surgery has significantly²⁰ (90%) higher mortality (age standardised) from chronic obstructive pulmonary disease than expected compared to East Sussex.
- 3.29 In 2011, 20.5% of persons were living with a limiting long term illness in Hailsham Parish, compared to an average of 17.5% in Wealden and 17.9% in England and Wales²¹. In Wealden there are 7,052 patients aged 17 years and over on diabetes registers. Prevalence of diabetes is significantly higher in Hailsham than in East Sussex. There are 1,666 patients on dementia registers in Wealden. Hailsham Central & North is among one of the wards that see the highest number of emergency admissions for persons with dementia above the level that is expected.
- 3.30 The Wealden green infrastructure study (2017, Chris Blandford Associates) identifies that areas of accessible natural greenspace are present throughout Hailsham, however they are less concentrated in the northern part of the settlement. In terms of the Natural England access standards, much of the north and east of the town is not within 300 m buffer of accessible natural green spaces of 2 ha in size, and much of the north of the town is not within 2 km of accessible natural green spaces of 20 ha. Otherwise, the town meets the access standards for green spaces of 2 ha and 20ha, and the whole town is within an appropriate distance from spaces which are 100 ha or 500 ha in size.
- 3.31 There are a number of public rights of way which provide links to the east, specifically linking to the Pevensey Levels. A large area of accessible Natural Greenspace is located to the southwest of the town. Access trails including the national cycle network and wealdway give access north / south and north / west respectively.
- 3.32 The network of pedestrian routes is incomplete and the Cuckoo Trail is poorly integrated with the town centre, and offers a poor 'welcome'²².

¹⁷Information gathered from Emerging Wealden Local Plan, East Sussex Downs and Weald PCT and Wealden Health and Wellbeing Strategy 2017: http://eastsussexjsna.org.uk/JsnaSiteAspx/media/jsna-media/documents/scorecards/2011_12/Commentaries/Loc_Hailsham.pdf [accessed 31.08.2018]

¹⁸ East Sussex Downs and Weald PCT (2012) Commentary for Hailsham Locality, Available at: http://eastsussexjsna.org.uk/JsnaSiteAspx/media/jsna-media/documents/scorecards/2011_12/Commentaries/Loc_Hailsham.pdf

¹⁹ 95% confidence interval

²⁰ 95% confidence interval

²¹ <http://eastsussexinfigures.org.uk/webview/welcome.html> [accessed 31.08.2018]

²² Hailsham Town Council (2018) Hailsham Neighbourhood Plan: Submission Version: April 2018

Key issues

- There are incidences of a number of health conditions within Hailsham, including chronic obstructive pulmonary disease, adult and childhood obesity, cancer, diabetes and dementia.
- Hailsham has an ageing population, which has specific needs to maintain and promote health.
- There are health discrepancies between more and less deprived areas of Hailsham.
- New housing development will create an additional need for open space, sports and recreational facilities.
- Accessibility of open spaces varies within the Plan area.
- The network of pedestrian routes is incomplete.

Likely evolution without the Plan

- 3.33 The emerging Wealden Local Plan includes policies that promote improved health and wellbeing across the district. However the Plan has the opportunity to provide more detailed policies that help to improve the health outcomes for its residents. This includes policies relating to transport, open space, community facilities, design, and the town centre.
- 3.34 Specific policies for new or improved open space, sport and recreation provision with planned development are provided in some site allocation policies in the Wealden Local Plan. However, the Plan can provide more detailed policy to inform the design of open spaces provided within new developments. The Plan can also set out site-specific GI and open space proposals for open spaces outside major developments as these are not set out in the Local Plan.
- 3.35 **The effects of the Plan on health have been scoped into the SA as the Plan could provide policies that help to improve health in the Plan area.**

Air quality, noise and traffic

- 3.36 The structure of the road network in Hailsham focusses routes through the town centre, which can result in congestion at key junctions and relatively high volumes of traffic along North Street. Conflicts between pedestrians, cyclists and vehicles can occur in the town centre. The draft Neighbourhood Plan identifies safety concerns associated with the junction of the High Street and George Street, the junction of the High Street and Battle Road, and pedestrian crossing points on main routes into and around the town centre. Further correspondence with local councillors identified air pollution concerns at Vicarage Lane, Market Street, George Street, North Battle Road, London Road, South Road and the High Street and a concern that the new one way system is exacerbating these issues.
- 3.37 The Plan also identifies that the network of pedestrian routes is incomplete, and sets out that the Cuckoo Trail is poorly integrated with the town centre, and offers a poor 'welcome'. The route from the South Road car park and along North Street is also identified as suffering from high levels of traffic noise, which reduces the quality of the environment
- 3.38 There are no designated air quality management areas within Hailsham, or Wealden District.

Key issues

- There are safety concerns and conflicts between different types of traffic in Hailsham Town Centre.
- The pedestrian network is incomplete.
- There are concerns regarding high levels of noise generated by road traffic within Hailsham Town Centre.

Likely evolution without the Plan

- 3.39 Policies within the emerging Wealden Local Plan will prevent, to a large extent, the adverse effects of noise, air quality, and traffic from new development. However, without the Plan, site-

specific issues could be overlooked. The Plan may also contain detailed policies that help to mitigate adverse impacts of air quality, noise and traffic such as policies relating to transport, housing design and green infrastructure.

3.40 The effects of the Plan on air quality, noise and traffic have been scoped into the SA as the Plan could influence air quality, noise and traffic within the Plan area.

Economy

- 3.41 At 68.3% of the total population, the percentage of the parish population that is economically active is 0.2% higher than the county average²³, but remains lower than the regional and national averages (68.1% and 69.7% respectively²⁴). However, unemployment levels for Hailsham (3.3%) remain lower than regional and national averages (3.4% and 4.4% respectively).
- 3.42 According to the 2011 Census, the three main occupations are: skilled trade workers (16.5%), caring, leisure and other service occupations (12.6%) and professional occupations (12.3%).
- 3.43 Hailsham's largest employment industries are: wholesale and retail trade, and repair of motor vehicles and motorcycles (18.2%); human health and social work activities (16.0%) and construction (11.2%).
- 3.44 The general proportion of full-time to part-time jobs, at approximately 2:1, is in line with regional and national averages.
- 3.45 The district of Wealden, which includes Hailsham, has a total of 8,635 businesses; almost double that of the nearby boroughs of Eastbourne (3,445) and Hastings (3,075).
- 3.46 The district of Wealden, which includes Hailsham, has a gross weekly earnings of £182, which is close to the regional and national averages (£181 and £186 respectively).
- 3.47 Workforce projections for the district of Wealden show slowly increasing workforce numbers from 79,188 in 2018 to 83,715 in 2031. This aligns to neighbouring districts such as Rother, which also have slowly rising workforce projections during the 2018-2031 period²⁵.
- 3.48 Most retail is located in Hailsham town centre and the central Quintins Centre retail outlet.
- 3.49 2011 Census data shows that many Hailsham residents work within the parish, but others commute to nearby coastal towns such as Eastbourne and Brighton for work²⁶, although a smaller number travel further afield to the north.

Key issues

- The percentage of the parish population that is economically active is lower than regional and national averages.

Likely evolution without the Plan

- 3.50 Despite rising workforce projection figures for the Wealden district between 2018 and 2031, the Wealden Economy Study²⁷ suggests that the existing stock of employment premises are of sub-optimal quality and will need future investment. The Plan presents an opportunity to address these issues by ensuring new office and other employment premises are of sufficient quality. It is also possible that the percentage of the workforce that is economically active will decline, due to the national trend of an ageing population. This is not a factor that the Plan can influence.

²³<http://eastsussexinfigures.org.uk/webview/index.jsp?catalog=http%3A%2F%2Fwww.eastsussexinfigures.org.uk%3A80%2Fobj%2FCatalog%2FCatalog54&submode=catalog&mode=documentation&top=yes>

²⁴ Economy Profile for Hailsham (Parish)- Wealden

<http://eastsussexinfigures.org.uk/webview/index.jsp?catalog=http%3A%2F%2Fwww.eastsussexinfigures.org.uk%3A80%2Fobj%2FCatalog%2FCatalog56&submode=catalog&mode=documentation&top=yes>

²⁵ ESCC Projections April 2018

<http://eastsussexinfigures.org.uk/webview/index.jsp?catalog=http%3A%2F%2Fwww.eastsussexinfigures.org.uk%3A80%2Fobj%2FCatalog%2FCatalog54&submode=catalog&mode=documentation&top=yes>

²⁶ Data Shine: Commute -

<http://commute.datashine.org.uk/#mode=allflows&direction=both&msoa=E02004417&zoom=11&lon=0.1593&lat=50.9212>

²⁷ Regeneris Consulting for Wealden District Council, Wealden Economy Study, December 2016

- 3.51 **The effects of the Plan on the economy will be scoped into the SA, as the Plan could influence economic growth and activity in the parish.**

Soils

- 3.52 The Agricultural Land Classification (ALC) system classifies agricultural land in five categories according to versatility and suitability for growing crops. Hailsham town is unclassified as 'urban' while the majority of the surrounding rural area within the Plan area is classified as Grade 3 (good to moderate quality agricultural land). It should be noted the specific subgrades of Grade 3 for this Plan area are unknown. Small areas to the north-west of the Plan area are classified as Grade 4 (poor quality agricultural land).
- 3.53 Soils published by Cranfield University shows, in simple terms, what the likely soil conditions are at any point in the landscape by reference to one of 27 different broad types of soil. There are three main soil types within the Plan area. To the west around the Hailsham urban area is 'slowly permeable seasonally wet slightly acid but base-rich loamy and clayey' soil with 'moderate' fertility. In the east is 'Loamy and clayey soils of coastal flats with naturally high groundwater' also with 'moderate' fertility. An area to the south-east of the Hailsham urban area, as well as an area to the south towards Stone Cross contains 'slightly acid loamy and clayey soils with impeded drainage'. These areas have 'moderate to high fertility'.

Key issues

- Development on greenfield sites could reduce the best and most versatile agricultural land within the Plan area (Grade 3a agricultural land), as well as areas known to have fertile soils (moderate and above).

Likely evolution without the Plan

- 3.54 There would be no difference in effect to soils without the Neighbourhood Plan as the Plan does not allocate sites for development. As such, development on greenfield land would continue without the Plan. Other aspects of soil management are beyond the scope of the Neighbourhood Plan.
- 3.55 **The effects of the Plan on soils have been scoped out of the SA as it is not expected that the measures contained within the Neighbourhood Plan will have any significant effects on soil quality in Hailsham. This is because the Neighbourhood Plan does not allocate sites for development.**

Water quality and resources

- 3.56 The Neighbourhood Plan area overlaps with the Cuckmere and Pevensy Levels catchments. Environment Agency data for the catchments show many of the rivers in the catchment area are classified as 'moderate' to 'poor' in terms of chemical, ecological and biological status along their lengths. Notable water bodies within the Neighbourhood Plan area include the Horse Eye Sewer (overall 'moderate' quality), Hurst Haven at Hailsham (overall 'moderate' quality), and Hurst Haven and Cuckmere between Arlington and Lower Horsebridge (overall 'poor' quality).
- 3.57 A range of human activities have the potential to pollute water e.g. industrial processes, runoff from agriculture, deliberate and accidental pollution incidents. Management of effluent discharge from Wastewater Treatment Works (WWTWs) such as those to the south-east of Hailsham are particularly important for the water quality in the Pevensy Levels. Southern Water has previously noted that based on forecast growth, there are capacity constraints on Hailsham South and Hailsham North WWTW due to the potential increase effluent discharge into the Pevensy Levels. In 2015, the preferred solution was to adopt new technologies that improve the quality of effluent discharge in order to accommodate growth without compromising the Pevensy Levels.
- 3.58 With regard to water resources, the Neighbourhood Plan is covered by the EA's Cuckmere & Pevensy Levels Catchment Abstraction Management Strategy (CAMS). Abstraction of surface

water for public water supply is covered by two large licences, one filling Arlington Reservoir on the Cuckmere and the other at Hazards Green on the Wallers Haven. The CAMS notes the proposed development in the Stone Cross, Polegate and Hailsham areas will add to the pressure on resources, therefore making the best use of the water resource is important.

Key issues

- New development could adversely affect water quality, particularly of the sensitive Pevensey Levels, due to increased surface water runoff, increased water abstraction and increased effluent discharge at wastewater sewage works.
- New development could increase pressure on water resources due to increased water-abstraction.
- Climate change could put pressure on water resources and could adversely affect water quality because of increased occurrences of drought and extreme rain.

Likely evolution without the Plan

- 3.59 Adverse effects on water quality and water resources are likely to be mitigated to a large extent by policies within the Wealden District Local Plan and by the Environment Agency's licensing regimes for water abstraction and discharges. However, the Plan provides an opportunity to ensure development adopts sustainable design and construction techniques that could help to mitigate adverse effects on water supply and quality, e.g. sustainable drainage systems (SUDS), provision of green infrastructure, or grey water recycling .
- 3.60 **The effects of the Plan on water quality and resources have been scoped into the SA as the Plan could ensure that development is designed in a way that mitigates adverse effects on water supply and water quality.**

Climate change mitigation

- 3.61 There is widespread scientific consensus that the Earth's climate is changing and that human activity is the principal cause. The IPCC²⁸ states that the warming of Earth's climate is unequivocal and since the 1950s, many of the observed changes are unprecedented over decades to millennia. Scientific forecasts suggest that the UK's climate will continue to get warmer and that the severity of weather systems over the UK will intensify²⁹.
- 3.62 The design and construction of the built environment, including transport infrastructure, together with economic and social activities can have an effect on energy consumption and subsequent greenhouse gas emissions and this can be influenced by planning policies for both new and existing development.
- 3.63 Due to the scale and transboundary nature of climate change effects, assessing climate change impacts at the parish level is often not feasible. Where possible, district or county level data has been collected for Wealden and East Sussex.
- 3.64 The district of Wealden, which includes Hailsham, emitted 6.2 tonnes of carbon dioxide per capita in 2012, compared to 6.6 tonnes per capita for the neighbouring district of Rother, and 4.2 tonnes per capita in the neighbouring borough of Hastings.
- 3.65 The population of Wealden consumes larger amounts of domestic energy (gas and electricity) than the national average. In 2016, Wealden district consumed an average (mean) of 4,707 kWh of electricity, in comparison to the national average figure of 3,812 kWh. In addition, an average (mean) of 14,169 kWh of gas was consumed in Wealden in 2010, compared to the national average value of 13,077 kWh³⁰.

²⁸ IPCC Climate Change 2014: Synthesis Report

²⁹ IPCC Climate Change 2014: Synthesis Report

³⁰ East Sussex in Figures, Dataset: Gas and electricity consumption, 2005-2016 – districts. Available at: <http://www.eastsussexinfigures.org.uk/webview/index.jsp?headers=Fueltypes&Geographysubset=E92000001%2CE12000008%2CE1000011%2CE07000061+->

- 3.66 East Sussex County Council (ESCC)³¹ has an ongoing energy management programme which seeks to reduce carbon emissions within the county. ESCC projects undertaken in 2016-2017 focused on improving or upgrading: internal and external lighting fixtures, lost insulation, cavity wall insulation, boiler controls and undertaking energy awareness workshops.
- 3.67 In 2014, four solar energy schemes were approved in the Lower Weald. Despite this, Wealden has a relatively low number of operational renewable energy schemes within the district.
- 3.68 The Neighbourhood Plan itself notes that the parish does not have a train station and there is poor access via public transport to national train services at Polegate. As such, residents are likely to be reliant on the use of private vehicles (cars, vans, motorbikes etc.), which contribute to greenhouse gas emissions.

Key issues

- The population of Wealden consumes greater amounts of electricity than national average levels.
- There is poor access to train services via public transport, leading to reliance on private vehicle transport.

Likely evolution without the Plan

- 3.69 It is likely that the impacts of climate change will continue to affect those living in Hailsham and all other areas of the UK. Given that the impacts of this issue are expected to worsen and intensify, it is likely that there will be added strains on existing infrastructure within Hailsham. Without the implementation of the Plan, mitigation measures such as electric cars may not be as readily available or accessible for use within the community.
- 3.70 **The effects of the Plan on climate change mitigation will be scoped into the SA as the Plan could help to minimise emissions of carbon dioxide and other greenhouse gases.**

Climate change adaptation

- 3.71 Local Authorities are responsible for carrying out Strategic Flood Risk Assessments (SFRA) for their areas to determine the level of risk from river and coastal flooding, ground water and surface water flooding, including its interaction with the sewer network. The Environment Agency provides information and advice to assist in the production of FRA's and SFRAs and also produce Flood Zone maps for river and coastal flooding.
- 3.72 Areas to the north-west of Hailsham town centre, such as Splent Crescent and a section of Upper Horsebridge Road, and Diplocks Way in the centre of Hailsham town, include locations within Flood Zone 3, which are at high risk of flooding³².
- 3.73 In 2010, some 27,611 properties were affected by localised flooding events in the county of East Sussex. This figure has risen by 568 properties from data collected in 2006³³.
- 3.74 Wealden's Green Infrastructure Study found that green infrastructure such as The Cuckoo Trail and an urban green grid for Hailsham may assist in adapting to climate change through

[+E07000065&stubs=Geography&Sectorslice=Total&measure=common&virtuallslice=ConsumptionGwh_value&layers=Sector&study=htt p%3A%2F%2F10.128.25.249%3A80%2Fobj%2Fstudy%2F472&Fueltypessubset=All+fuels%2CBioenergy+and+wastes+ +Petroleum+products&mode=cube&Yearslice=2016&virtuallsubset=ConsumptionGwh_value&v=2&Yearsubset=2016&Sectorsubset=Tot al&measuretype=4&cube=http%3A%2F%2F10.128.25.249%3A80%2Fobj%2Fcube%2F472_C1&top=yes](http://E07000065&stubs=Geography&Sectorslice=Total&measure=common&virtuallslice=ConsumptionGwh_value&layers=Sector&study=htt p%3A%2F%2F10.128.25.249%3A80%2Fobj%2Fstudy%2F472&Fueltypessubset=All+fuels%2CBioenergy+and+wastes+ +Petroleum+products&mode=cube&Yearslice=2016&virtuallsubset=ConsumptionGwh_value&v=2&Yearsubset=2016&Sectorsubset=Tot al&measuretype=4&cube=http%3A%2F%2F10.128.25.249%3A80%2Fobj%2Fcube%2F472_C1&top=yes). Accessed: 19/10/18

³¹ East Sussex County Council: Annual Greenhouse Gas Emissions Report 2016-2017

file:///C:/Users/ielden_/AppData/Local/Microsoft/Windows/INetCache/IE/G2ST60TC/greenhousegasreport2016-17.pdf

³² Likelihood of Flooding in this Area - <https://flood-map-for-planning.service.gov.uk/confirm-location?easting=558793.42&northing=110018.581&placeOrPostcode=hailsham>

³³ <http://eastsussexinfigures.org.uk/webview/index.jsp?catalog=http%3A%2F%2Fwww.eastsussexinfigures.org.uk%3A80%2Fobj%2F Catalog%2FCatalog54&submode=catalog&mode=documentation&top=yes>

innovative green infrastructure design solutions such as sustainable water management and urban cooling systems³⁴.

Key issues

- There are existing and future flood risk issues, such as those associated with the Splent Crescent, Upper Horsebridge Road and Diplocks Way.
- Current amounts of green infrastructure within Hailsham may not be sufficient enough to address future climate change effects within Hailsham.

Likely evolution without the Plan

- 3.75 As climate change effects are likely to be continually felt in Hailsham and in other parts of the UK, increasingly, there will be a need for local services and infrastructure to adapt and meet the needs of future populations. The Plan could help to ensure that buildings and associated infrastructure will be constructed to incorporate climate change resilience.
- 3.76 **The effects of the Plan on climate change adaptation will be scoped into the SA as the Plan could help to ensure that the parish, including any new development, is able to adapt to climate change.**

Biodiversity and geodiversity

- 3.77 There are a number of sites that are of international and national importance for nature conservation, which consist of Special Areas of Conservation (SAC), Special Protection Areas (SPA), Ramsar sites and Sites of Special Scientific Interest (SSSI), that lie within and in proximity to Hailsham. Pevensey Levels is in the east and south east part of Hailsham and extends beyond the parish to the east and south east. Dungeness, Romney Marsh and Rye Bay is located 13 km to the south east of Hailsham.
- Pevensey Levels (SSSI, SAC and Ramsar site) is a large wet grassland complex criss-crossed with freshwater ditches. Its SAC qualifying feature is a small freshwater snail, the little whirlpool ram's-horn snail (*Anisus vorticulus*). Current threats to the site are inappropriate water levels, invasive species, and water pollution from nutrient inputs.³⁵
 - Dungeness, Romney Marsh and Rye Bay (SPA) is a large area with a diverse coastal and marine landscape comprising a number of habitats. The site includes the largest and most diverse area of shingle beach in Britain, with low-lying hollows in the shingle providing nationally important saline lagoons, natural freshwater pits and basin fens.³⁶
- 3.78 There are three areas of Ancient Woodland within Hailsham. Coldthorn wood is to the south west of Hailsham and extends outside of the parish boundary to the south west. The second is Tile Hurst which is to the west of Hailsham and extends west outside of the parish boundary. Thirdly, Poultry Houses Shaw lies to the northwest of Hailsham. There are no National or Local Nature Reserves within Hailsham.
- 3.79 The area of the Parish to the east of the town is rural and consists primarily of coastal and floodplain grazing marsh, which is a priority habitat.

Key issues

- There are a number of sensitive habitats and designated sites within and within proximity of the parish.
- The Pevensey Levels are subject to a number of threats.

³⁴ Wealden Green Infrastructure Study (May 2017)

http://wealden.gov.uk/Wealden/Residents/Planning_and_Building_Control/Planning_Policy/Evidence_Base/Planning_Evidence_Base_Bio_diversity_and_Green_Infrastructure.aspx

³⁵ Natural England Site Improvement Plan <http://publications.naturalengland.org.uk/publication/6057793526169600>

³⁶ Natural England Site Improvement Plan <http://publications.naturalengland.org.uk/publication/6291480347934720>

Likely evolution without the Plan

- 3.80 Adverse impacts to the Pevensey Levels could increase due to population growth, development and recreational pressures. However, the Plan has the opportunity to ensure that measures are put in place to ensure that development does not have a significant adverse impact on the Pevensey Levels. Globally, there has been a decline in biodiversity in recent years. In the UK specifically, over 40% of priority habitats and 30% of priority species were declining in the most recent analysis.³⁷
- 3.81 **The effects of the Plan on biodiversity and geodiversity have been scoped into the SA, as the Plan could help to ensure that development avoids significant adverse effects on the biologically diverse sites within and around Hailsham.**

Historic environment

- 3.82 There are a number of heritage designations within Hailsham including 57 listed buildings (Grades I, II* and II) and one Scheduled Monument. The Plan highlights that there are 29 listed buildings of high quality in and around the town centre, including many along George Street, with the Church being an important local landmark. The scale and materials of many of the buildings reflect the local geology and generate local character. Much of the town centre is designated as a conservation area. While the town centre benefits from a fine grain historic high street, it is surrounded by larger scale retail and civic uses which contrast with the historic structure.³⁸ At present, there are no heritage assets at risk within Hailsham.³⁹

Key issues

- Potential conflicts between the protection of heritage assets and mitigating the impact of climate change. For example, where homeowners wish to install renewable energy features, such as solar PV arrays on roofs in a conservation area or on a listed building, this may adversely affect the heritage significance of the building or surrounding area.
- Adaptation to climate change and flood risk mitigation measures should have regard to the character of the historic environment.
- Loss of appropriate training/skills and materials to maintain the character and distinctiveness.
- Potential lack of access to and understanding of the historic environment.

Likely evolution without the Plan

- 3.83 There will be no change to the baseline in the absence of the Plan, due to protection of designated features through national policy and also through policies in the Wealden Local Plan that promote conservation of the historic environment. However, the Plan has the opportunity to ensure that any new development is undertaken with the aim of conserving and enhancing the historic environment.
- 3.84 **The effects of the Plan on the historic environment have been scoped into the SA, as the Plan could ensure that development is not detrimental to the character of Hailsham's historic environment.**

Landscape

- 3.85 The Plan area is covered by four character areas, as outlined in the Wealden Landscape and Settlement Character Assessment 2014. These are the Eastern Low Weald, Pevensey Levels, South Slope of High Weald, and Hailsham Character areas.

³⁷ Biodiversity 2020: A strategy for England's wildlife and ecosystem services, 2011

³⁸ Hailsham Neighbourhood Plan Submission Version, April 2018

³⁹ Historic England, Heritage at Risk Register, 2018

- 3.86 Eastern Low Weald is characterised by significant areas of flat, nearly treeless country. However, the large woodland area of Abbot's Woods is located to the east of the character area.
- 3.87 Pevensey Levels is a flat and open landscape characterised by reeds, drainage channels, grazing marsh scattered thorns and willows.
- 3.88 South Slope and high Weald is an intricate, small-scale landscape with a strong pattern of hedgerows, falling southward from the Heathfield to Battle ridge towards the Low Weald and Pevensey Levels. This landscape of gentle valleys and slopes affords good views of the Downs.
- 3.89 Hailsham is a nucleated settlement, which has growth around several north-south orientated corridors. Established as a market town in 1252, Hailsham retains its historic core. The town has grown considerably in the past century, with significant residential development occurring in the post-war years. More recently, house building has taken place on the western and southern edges of the town.
- 3.90 A patchwork of small-scale historic fields surrounds the settlement, often abutting the settlement edge. These are interspersed with large areas of Ancient Woodland, at the south-western edge of the town. The un-wooded ancient landscapes to the west of the settlement are cohesive, with a distinctive field pattern (aggregate assarts). To the north are scattered areas of regular and irregular piecemeal enclosure, and to the east, regular piecemeal enclosure and consolidated strip fields. Further to the east and south east (within the levels landscape), is a landscape of brooks innings and saltmarsh innings.
- 3.91 A number of culturally important landmarks are located within the settlement area, including Horselunges Manor complex to the north of the settlement and Michelham Priory to the west of the settlement.
- 3.92 The edge of Hailsham is predominantly surrounded by trees and woodland with a few pockets of exposed or prominent urban edges along the northern edges of the town.
- 3.93 The valley of the River Cuckmere is a key landscape feature, running to the north and west of the town. To the east of the settlement, the vast expanse of Pevensey Levels, with its associated drainage ditches is a key feature.
- 3.94 There are key views southward from the town towards Wilmington Wood.
- 3.95 A network of footpaths and bridleways connects Hailsham to its landscape setting, such as the Cuckoo Trail.

Key issues

- Large industrial and commercial buildings in the south of the town, a sewage works to the south east of the town and a Chalet Park also at the eastern edge of the town are considered to have an adverse effect on the landscape.
- New development could adversely affect landscape if not designed carefully.

Likely evolution without the Plan

- 3.96 Hailsham's landscape would largely be protected by policies within the Wealden District Local Plan. However, the Plan provides an opportunity to provide more detailed policy in relation to design and local distinctiveness, thereby helping to conserve and enhance landscape.
- 3.97 **The effects of the Plan on landscape have been scoped into the SA as the Plan could ensure that development is designed in a way that conserves and enhances landscape.**

Topics to be considered in the SA

- 3.98 Based on the information set out above, **Table 3.1** sets out those topics that will be scoped into the SA of the Hailsham Neighbourhood Plan.

Table 3.1: Topics to be considered in the SA

Scoped in	Scoped out
Population	Soils
Health	
Air Quality, Noise and Traffic	
Economy	
Water quality and resources	
Climate Change Mitigation	
Climate Change Adaptation	
Biodiversity and Geodiversity	
Historic Environment	
Landscape	
Housing	
Education	

4 SA framework

SA objectives

- 4.1 The development of a set of SA objectives (known as the SA framework) is a recognised way in which the likely environmental and sustainability effects of a plan can be described, analysed and compared.
- 4.2 The SA framework that was used for the Wealden Local Plan has been used as the starting point for the SA framework for the Hailsham Neighbourhood Plan. It has been reviewed in light of the revised and updated review of other plans and programmes, baseline information and key sustainability issues for Hailsham (as presented in **Chapter 3**) and amendments have been made to a number of the objectives to ensure that they are appropriate for the Hailsham Neighbourhood Plan. In particular, the SA objectives have been reviewed to ensure that those topics specifically required by the SEA Regulations that have been scoped in are clearly addressed.
- 4.3 The proposed SA framework for the Hailsham Neighbourhood Plan is presented in **Table 4.1**. The final column in the table demonstrates which SA objective addresses which of the topics that are required to be covered by Schedule 2 of the SEA Regulations. In line with the baseline information, soil, as a topic, has been scoped out of the SA as it is considered that the Hailsham Neighbourhood Plan will not have any effect on this.

Table 4.1: SA framework for the Hailsham Neighbourhood Plan

SEA Objectives	Guidance Questions – will the Plan...?	SEA Regulations Topic(s) covered
<p>1 Protect and enhance biodiversity and geodiversity within the Parish.</p>	<ul style="list-style-type: none"> • Protect, conserve and enhance the geodiversity and biodiversity of sites, including habitats that support it, of International, European, national and local importance? • Conserve and enhance habitats and species within the parish, particularly where these are rare, declining, threatened or indigenous? • Avoid where possible, and otherwise minimise, adverse impacts on species and habitats through human activities and development? 	<p>Biodiversity Flora Fauna</p>
<p>2 Conserve and enhance the Parish’s landscape and townscape.</p>	<ul style="list-style-type: none"> • Avoid and minimise negative impacts of future development on the landscape and townscape? • Protect local landscape and townscape quality, distinctiveness and character from unsympathetic development and changes in land management? • Protect local landscape quality, distinctiveness and character from poor access management? 	<p>Landscape</p>
<p>3 Conserve and enhance the Parish’s historic environment and cultural assets.</p>	<ul style="list-style-type: none"> • Maintain the character, setting and appearance of historic assets in the Parish, particularly designated assets? • Maintain and promote access to historic and cultural assets for all, where appropriate? 	<p>Cultural heritage</p>
<p>4 To maintain and improve the water quality of the Parish’s waterbodies and groundwater, and to achieve sustainable water resources management.</p>	<ul style="list-style-type: none"> • Maintain and, where possible, improve the quality and quantity of all water resources? • Incorporate sustainable urban drainage systems (SUDs) and green infrastructure practices into new development? • Ensure that new developments do not lead to a reduction in the quality of ground water, surface water or river water • Lead to the effective management of demand for water, prevent stress on the natural environment and help water users adapt to the impacts of 	<p>Water Climatic factors</p>

SEA Objectives	Guidance Questions – will the Plan...?	SEA Regulations Topic(s) covered
	climate change?	
5 Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.	<ul style="list-style-type: none"> • Guide inappropriate development away from flood risk areas? • Ensure that where development in flood risk areas is permitted, the risks to people and property are mitigated? • Promote flood resilience and resistance measures in development, including incorporating sustainable urban drainage systems (SUDs) and green infrastructure practices into new development? 	Water Climatic factors
6 Reduce air pollution and minimise traffic, particularly in Hailsham town centre.	<ul style="list-style-type: none"> • Ensure that local air quality is not adversely affected pollution and seek to improve it where necessary? • Limit or reduce the emission of air pollutants? • Promote inclusion of sustainable transport links within the District and reducing the need to travel? 	Air Human Health
7 Minimise greenhouse gas emissions in the Parish.	<ul style="list-style-type: none"> • Limit or reduce the emission of greenhouse gases? • Encourage and promote the use of clean, low carbon energy efficient technologies? • Maximise the use of energy from renewable resources? • Encourage energy-efficient design? • Promote inclusion of sustainable transport links within the District? • Locate development close to existing services and facilities to ease access? 	Climatic factors Air
8 Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home.	<ul style="list-style-type: none"> • Ensure provision of sufficient levels of affordable housing? • Provide a sufficient mix of housing types and tenures to meet current and future needs of the Parish? • Ensure new housing is good quality, resource efficient and with a reduced environmental 	Population Material Assets

SEA Objectives	Guidance Questions – will the Plan...?	SEA Regulations Topic(s) covered
<p>9 Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness?</p>	<p>impact?</p> <ul style="list-style-type: none"> • Deliver education and training which helps everyone develop the values, knowledge and skills necessary to enable them to live, act and work in a sustainable society? • Recognise the need for people to adapt to economic change and retrain where necessary? • Encourage provision of new education facilities and services to support the learning and professional development of the local population? • Enhance access to existing education facilities? 	<p>Population Material Assets</p>
<p>10 Facilitate improved health and wellbeing of the population including reducing inequalities in health.</p>	<ul style="list-style-type: none"> • Ensure all members of society have access to the health care that they require? • Reduce health inequalities within society associated with income, lifestyle and diet? • Improve road safety and advocate sustainable modes of transport? • Help create a healthy and safe working and living environment with low rates of crime and disorder? • Help improve quality of life for all? • Anticipate and plan for the potential impacts of climate change on health? • Minimise noise and light pollution? 	<p>Population Human Health</p>
<p>11 Facilitate a sustainable and growing economy that enhances access to employment and business opportunities.</p>	<ul style="list-style-type: none"> • Increase the number, variety and quality of employment opportunities including those offered by tourism and social enterprise? • Increase access for all to a range of jobs through improved training, sustainable transport and communication links? • Increase and widen future employment opportunities? 	<p>Population Material Assets</p>

Use of the SA framework

- 4.4 The findings of the SA of the Hailsham Neighbourhood Plan will be presented using colour coded symbols to show the score for each option against each of the SEA objectives, along with a concise justification for the score given, focussing on significant effects (both positive and negative).

Key to SA scores

++	Significant positive effect likely
+	Minor positive effect likely
0	Negligible effect likely
-	Minor negative effect likely
--	Significant negative effect likely
?	Likely effect uncertain
+/-	Mixed effect likely

5 Conclusions and next steps

- 5.1 In order to meet the requirements of the SEA Regulations, the views of the three statutory consultees (Natural England, Historic England and the Environment Agency) are being sought in relation to the scope and level of detail to be included in the SA report.
- 5.2 This SA Scoping Report is being published for a five week period from 7th November 2018 for consultation with the three statutory bodies.
- 5.3 The consultees are requested to comment on the proposed scope and level of detail of the SA, in particular:
- Whether the review of other plans, policies or programmes (**Chapter 2** and **Appendix 1**) identifies the key elements of the policy context for the Neighbourhood Plan, outlining the most important policy objectives it should be seeking to support.
 - Whether the baseline information section (**Chapter 3**) correctly identifies the key elements of the current environmental/sustainability context in relation to the aspects of the environment where a Neighbourhood Plan can make a difference, providing a suitable baseline against which the Plan's effects can be assessed and monitored.
 - Whether the baseline information section (**Chapter 3**) identifies all existing environmental/sustainability problems that the Hailsham Neighbourhood Plan could influence.
 - Whether the proposed SA objectives (**Chapter 4**) provide a suitable framework for assessing the sustainability performance of the reasonable alternative approaches being considered for inclusion in the Hailsham Neighbourhood Plan, and whether they adequately cover the topics required by the SEA Regulations, except where these are beyond the remit of the Neighbourhood Plan.
- 5.4 Following receipt of comments from this consultation, any necessary changes will be made to this document. The Hailsham Neighbourhood Plan will then be subject to the later stages of the SA (stage B onwards) using the SEA framework. A full SA report will then be produced and made available to other stakeholders and the general public for wider consultation alongside the emerging Neighbourhood Plan.

LUC
November 2018

Appendix 1

Review of other relevant plans and programmes

Table A1.1: Review of plans and programmes relevant to the preparation of the Hailsham Neighbourhood Plan and the SEA

Plan or programme	Key objectives relevant to the Local Plan and SA	Implications for the SA
INTERNATIONAL		
EU Directives		
<i>SEA Directive 2001</i> Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment	Provides for a high level of protection of the environment and contributes to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development.	Requirements of the SEA Directive must be met in Sustainability Appraisals.
<i>Energy Performance of Buildings Directive 2010 on the energy performance of buildings 2010/31/EU</i>	The Directive aims to promote the energy performance of buildings and building units. It requests that member states adopt either national or regional methodology for calculating energy performance and minimum requirements for energy performance.	Consider any measures to promote energy performance of buildings.
<i>The Birds Directive 2009</i> Directive 2009/147/EC is a codified version of Directive 79/409/EEC as amended	Requires the preservation, maintenance, and re-establishment of biotopes and habitats to include the following measures: <ul style="list-style-type: none"> • Creation of protected areas. • Upkeep and management in accordance with the ecological needs of habitats inside and outside the protected zones. • Re-establishment of destroyed biotopes. Creation of biotopes.	Include sustainability objective / appraisal questions for the protection of biodiversity and take account of the HRA findings.
<i>The Air Quality Directive 2008</i> Directive 2008/50/EC on ambient air quality and cleaner air for Europe	Avoid, prevent and reduce harmful effects of ambient noise pollution on human health and the environment.	Include sustainability objective / appraisal questions to maintain and enhance air quality.
<i>The Floods Directive 2007</i>	Establishes a framework for the assessment and management of flood risks, aiming at the reduction of the adverse consequences for human health, the environment, cultural heritage	Include sustainability objective / appraisal

Plan or programme	Key objectives relevant to the Local Plan and SA	Implications for the SA
Directive 2007/60/EC on the assessment and management of flood risks	and economic activity associated with floods.	questions that relate to flood management and reduction of risk.
<p><i>The Water Framework Directive 2000</i></p> <p>Directive 2000/60/EC establishing a framework for community action in the field of water policy</p>	Protection of inland surface waters, transitional waters, coastal waters and groundwaters.	Include sustainability objective / appraisal questions to protect and minimise the impact on water quality.
<p><i>The Drinking Water Directive 1998</i></p> <p>Directive 98/83/EC on the quality of water intended for human consumption</p>	Protect human health from the adverse effects of any contamination of water intended for human consumption by ensuring that it is wholesome and clean.	Include sustainability objective / appraisal questions to protect and enhance water quality.
<p><i>The Habitats Directive 1992</i></p> <p>Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora</p>	Promote the maintenance of biodiversity taking account of economic, social, cultural and regional requirements. Conservation of natural habitats and maintain landscape features of importance to wildlife and fauna.	Include sustainability objective / appraisal questions for the protection of biodiversity and take account of the HRA findings.
European plans and programmes		
EU Seventh Environment Action Programme (2014)	<p>The EU's objectives in implementing the programme are:</p> <ul style="list-style-type: none"> (a) to protect, conserve and enhance the Union's natural capital; (b) to turn the Union into a resource-efficient, green and competitive low-carbon economy; (c) to safeguard the Union's citizens from environment-related pressures and risks to health and wellbeing; (d) to maximise the benefits of the Union's environment legislation by improving implementation; (e) to improve the knowledge and evidence base for Union environment policy; (f) to secure investment for environment and climate policy and address environmental externalities; (g) to improve environmental integration and policy coherence; (h) to enhance the sustainability of the Union's cities; (i) to increase the Union's effectiveness in addressing international environmental and climate- 	Include sustainability objectives / appraisal questions to protect and enhance the natural environment.

Plan or programme	Key objectives relevant to the Local Plan and SA	Implications for the SA
	related challenges.	
European Landscape Convention (Florence, 2002)	The convention promotes landscape protection, management and planning.	Include sustainability objective / appraisal questions to maintain and enhance landscape.
Johannesburg Declaration on Sustainable Development (2002)	Commitment to building a humane, equitable and caring global society aware of the need for human dignity for all. Renewable energy and energy efficiency. Accelerate shift towards sustainable consumption and production.	Consider a broad range of aspects of sustainability throughout the appraisal.
Aarhus Convention (1998)	Established a number of rights of the public with regard to the environment. Local authorities should provide for: The right of everyone to receive environmental information The right to participate from an early stage in environmental decision making The right to challenge in a court of law public decisions that have been made without respecting the two rights above or environmental law in general.	Ensure that public are involved and consulted at all relevant stages of SA production.
NATIONAL		
White Papers		
Energy White Paper: Our Energy Future (2003)	There are four key aims in this document: <ul style="list-style-type: none"> • To put ourselves on a path to cut the United Kingdom carbon dioxide emissions- the main contributor to global warming- by some 60 % by about 2050, with real progress by 2020; • To maintain the reliability of energy supplies; • To promote competitive markets in the United Kingdom and beyond, helping to raise the rate of sustainable economic growth and to improve our productivity; and To make sure that every home is adequately and affordably heated.	Include a sustainability objective/ appraisal questions relating to energy efficiency.
Heritage Protection for the 21 st Century: White Paper (2007)	The proposals in this White Paper reflect the importance of the heritage protection system in preserving our heritage for people to enjoy now and in the future. They are based around three core principles: <ul style="list-style-type: none"> • Developing a unified approach to the historic environment; • Maximising opportunities for inclusion and involvement; and • Supporting sustainable communities by putting the historic environment at the heart of an effective planning system 	Include a sustainability objective / appraisal questions relating to cultural heritage.

Plan or programme	Key objectives relevant to the Local Plan and SA	Implications for the SA
<p>Natural Environment White Paper, 2011</p> <p><i>The Natural Choice: securing the value of nature</i></p>	<p>Protecting and improving our natural environment;</p> <p>Growing a green economy; and</p> <p>Reconnecting people and nature.</p>	<p>Promote enhancement of and access to the natural environment.</p>
<p>Electricity Market Reform White Paper 2011, <i>Planning our Electric Future: A White Paper for Secure, Affordable and Low-Carbon Electricity</i></p>	<p>This White Paper sets out the Government's commitment to transform the UK's electricity system to ensure that our future electricity supply is secure, low-carbon and affordable.</p>	<p>Include sustainability objective / appraisal questions to reduce carbon emissions and increase proportion of energy generated from renewable sources.</p>
<p>The Future of Transport White Paper 2004: A network for 2030</p>	<p>Ensure we can benefit from mobility and access while minimising the impact on other people and the environment, now and in the future.</p> <p>Get the best out of our transport system without damaging our overall quality of life.</p> <p>Develop strategies that recognise that demand for travel will increase in the future.</p> <p>Work towards a transport network that can meet the challenges of a growing economy and the increasing demand for travel but can also achieve the government's environmental objectives.</p>	<p>Include sustainability objective / appraisal questions to reduce the need to travel and improve choice and use of sustainable transport modes.</p>
<p>Water White Paper, 2011</p> <p><i>Water for Life</i></p>	<p>Objectives of the White Paper are to:</p> <ul style="list-style-type: none"> • Paint a clear vision of the future and create the conditions which enable the water sector and water users to prepare for it; • Deliver benefits across society through an ambitious agenda for improving water quality, working with local communities to make early improvements in the health of our rivers by reducing pollution and tackling unsustainable abstraction; • Keep short and longer term affordability for customers at the centre of decision making in the water sector; • Protect the interests of taxpayers in the policy decisions that we take; • Ensure a stable framework for the water sector which remains attractive to investors; • Stimulate cultural change in the water sector by removing barriers to competition, fostering innovation and efficiency, and encouraging new entrants to the market to help improve the range and quality of services 	<p>Include sustainability objective / appraisal questions that relate to water quality and quantity.</p>

Plan or programme	Key objectives relevant to the Local Plan and SA	Implications for the SA
	<p>offered to customers and cut business costs;</p> <ul style="list-style-type: none"> • Work with water companies, regulators and other stakeholders to build understanding of the impact personal choices have on the water environment, water resources and costs; and <p>Set out roles and responsibilities – including where Government will take a stronger role in strategic direction setting and assessing resilience to future challenges, as well as clear expectations on the regulators.</p>	
<p>Housing White Paper 2016, <i>Fixing our broken housing market</i></p>	<p>The White Paper sets out ways to address shortfall in affordable homes and boost housing supply. The White Paper focuses on the following:</p> <ul style="list-style-type: none"> • Planning for the right homes in the right places – Higher densities in appropriate areas, protecting the Green Belt while making more land available for housing by maximising the contribution from brownfield and surplus public land, regenerating estates, releasing more small and medium-sized sites, allowing rural communities to grow and making it easier to build new settlements • Building homes faster – Improved speed of planning cases, ensuring infrastructure is provided and supporting developers to build out more quickly. • Diversifying the Market – Backing small and medium-sized house builders, custom-build, institutional investors, new contractors, housing associations. • Helping people now – supporting home ownership and providing affordable housing for all types of people, including the most vulnerable 	<p>Include sustainability objectives/appraisals that relate to providing the right mix of housing available to those who need it.</p>
<p>Policies and strategies</p>		
<p>MHCLG (2018) National Planning Policy Framework</p>	<p>Presumption in favour of sustainable development.</p> <p>Achieving sustainable development by:</p> <p>Delivering a sufficient supply of homes.</p> <p>Building a strong, competitive economy.</p> <p>Ensuring vitality of town centres.</p> <p>Promoting healthy and safe communities.</p> <p>Promoting sustainable transport.</p> <p>Supporting high quality communications.</p> <p>Making effective use of land.</p> <p>Achieving well-designed places.</p> <p>Protecting Green Belt Land.</p>	<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>Include a sustainability objective / appraisal question relating to each of these topics, where they have been identified as relevant in the review of baseline information.</p>

Plan or programme	Key objectives relevant to the Local Plan and SA	Implications for the SA
	<p>Meeting the challenge of climate change, flooding, and coastal change.</p> <p>Conserving and enhancing the natural environment.</p> <p>Conserving and enhancing the historic environment.</p> <p>Facilitating the sustainable use of minerals.</p>	
<p>National Planning Practice Guidance, DCLG</p>	<p>Provides further guidance to be read alongside the NPPF on a range of topics that link to the promotion of sustainable development including:</p> <ul style="list-style-type: none"> • Air quality • Climate change • Conserving and enhancing the historic environment • Flood risk • Health and well being • Housing and economic development • Natural environment • Minerals • Rural housing • Open space • Transport • Waste <p>Water supply, wastewater and water quality</p>	<p>The PPG sets out a range of social, economic and environmental considerations for the preparation of the Local Plan. It also includes information on undertaking sustainability appraisals which can be taken into consideration.</p>
<p>The Conservation of Habitats and Species Regulations 2017</p>	<p>The Regulations provide for the designation and protection of 'European sites', the protection of 'European protected species' and the adaptation of planning and other controls for the protection of European sites.</p>	<p>Include a sustainability objective / appraisal question regarding the protection of European sites and species and take account of the findings of the HRA.</p>
<p>DfT (2013) <i>Door to Door: A strategy for improving sustainable transport integration</i></p>	<p>The strategy's vision is for an inclusive, integrated and innovative transport system that works for everyone, and where making door-to-door journeys by sustainable means is an attractive and convenient option. Four key areas to address are highlighted:</p> <ul style="list-style-type: none"> • improving availability of information; • simplifying ticketing; • making connections between different steps in the journey, and different modes of transport, easier; and <p>providing better interchange facilities.</p>	<p>Include a relevant sustainability objective / appraisal question relating to sustainable transport.</p>
<p>DEFRA (2011) <i>Biodiversity 2020: A strategy for England's wildlife and</i></p>	<p>The strategy aims to guide conservation efforts in England up to 2020, and move from a net biodiversity loss to gain. The strategy includes 22 priorities which include actions for the</p>	<p>Include sustainability objective / appraisal</p>

Plan or programme	Key objectives relevant to the Local Plan and SA	Implications for the SA
<i>ecosystem services</i>	following sectors: <ul style="list-style-type: none"> • Agriculture; • Forestry; • Planning and Development; • Water Management; • Marine Management; • Fisheries; • Air Pollution; and Invasive Non-Native Species.	question that relates to biodiversity.
DEFRA (2018) <i>A Green Future: Our 25 Year Plan to Improve the Environment</i>	Sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently.	Include sustainability objective / appraisal question that relates to the protection and enhancement of the natural environment.
UK Government Sustainable Development Strategy: Securing the Future (2005)	The Strategy sets out 5 principles for sustainable development: <ul style="list-style-type: none"> • Living within environmental limits; • Ensuring a strong, healthy and just society; • Achieving a sustainable economy; • Promoting good governance ; and • Using sound science responsibly. The strategy sets four priorities for action: <ul style="list-style-type: none"> • Sustainable consumption and production; • Climate change and energy; • Natural resource protection and environmental enhancement; • Sustainable communities The strategy commits to: <ul style="list-style-type: none"> • A programme of community engagement; • Forums to help people live sustainable lifestyles; • Open and innovative ways for stakeholders to influence decision; educating and training 	To ensure that the requirements of the Strategy are embedded within the SA framework.
The Carbon Plan: Delivering our Local Carbon Future (2011)	The Carbon Plan sets out the government’s plans for achieving the emissions reductions it committed to in the first four carbon budgets. Emissions in the UK must, by law, be cut by at least 80% of 1990 by 2050. The UK was first to set its ambition in law and the Plan sets out progress to date.	Include a sustainability objective relating to greenhouse gas emissions.
Department of Health (2010) <i>Healthy Lives, Healthy People: our</i>	Protect the population from serious health threats; helping people live longer, healthier and more fulfilling lives; and improving the health of the poorest, fastest. Prioritise public health	Include a sustainability objective / appraisal

Plan or programme	Key objectives relevant to the Local Plan and SA	Implications for the SA
<i>Strategy for public health in England</i>	funding from within the overall NHS budget.	question relating to health and well-being.
The National Adaptation Programme – Making the Country Resilient to a Changing Climate (Defra, 2013)	<p>The report sets out visions for the following sectors:</p> <ul style="list-style-type: none"> • Built Environment – <i>“buildings and places and the people who live and work in them are resilient to a changing climate and extreme weather and organisations in the built environment sector have an increased capacity to address the risks and take the opportunities from climate change”</i>. • Infrastructure – <i>“an infrastructure network that is resilient to today’s natural hazards and prepared for the future changing climate”</i>. • Healthy and resilient communities – <i>“a health service, a public health and social care system which are resilient and adapted to a changing climate. Communities and individuals, including the most vulnerable, are better prepared to cope with severe weather events and other impacts of climate change. Emergency services and local resilience capability take account of and are resilient to, a changing climate”</i>. • Agriculture and Forestry – <i>“profitable and productive agriculture and forestry sectors that take the opportunities from climate change are resilient to its threats and contribute to the resilience of the natural environment by helping maintain ecosystem services and protect and enhance biodiversity”</i>. • Natural Environment – <i>“the natural environment, with diverse and healthy ecosystems, is resilient to climate change, able to accommodate change and valued for the adaptation services it provides”</i>. • Business – <i>“UK businesses are resilient to extreme weather and prepared for future risks and opportunities from climate change”</i>. • Local Government – <i>“Local government plays a central in leading and supporting local places to become more resilient to a range of future risk and to be prepared for the opportunities from a changing climate”</i>. 	Include sustainability objectives / appraisal questions which seek to promote the implementation of adaptation measures to make the area more resilient to a changing climate.
The National Flood and Coastal Erosion Risk Management Strategy for England (Environment Agency, 2011)	<p>This Strategy sets out the national framework for managing the risk of flooding and coastal erosion. It sets out the roles for risk management authorities and communities to help them understand their responsibilities.</p> <p>The strategic aims and objectives of the Strategy are to:</p> <ul style="list-style-type: none"> • <i>“manage the risk to people and their property;</i> • <i>Facilitate decision-making and action at the appropriate level – individual, community or local authority, river catchment, coastal cell or national;</i> <p><i>Achieve environmental, social and economic benefits, consistent with the principles of sustainable development”</i>.</p>	The SA framework should include sustainability objectives / appraisal questions which seek to reduce the risk and manage flooding sustainably.
Future Water: The Government’s Water Strategy for England	Sets out how the Government want the water sector to look by 2030 and an outline of the steps which need to be taken to get there.	Include sustainability objectives / appraisal questions which seek to

Plan or programme	Key objectives relevant to the Local Plan and SA	Implications for the SA
(DEFRA, 2008)	<p>The vision for 2030 is one where we, as a country have:</p> <ul style="list-style-type: none"> • <i>“improved the quality of our water environment and the ecology it supports, and continue to maintain high standards of drinking water quality from taps;</i> • <i>Sustainably managed risks from flooding and coastal erosion, with greater understanding and more effective management of surface water;</i> • <i>Ensure a sustainable use of water resources, and implement fair, affordable and cost-reflective water charges;</i> • <i>Cut greenhouse gas emissions; and</i> <p><i>Embed continuous adaptation to climate change and other pressures across the water industry and water users”.</i></p>	protect, manage and enhance the water environment.
DEFRA (2007) <i>The Air Quality Strategy for England, Scotland, Wales and Northern Ireland. 1</i>	<p>The Air Quality Strategy sets out a way forward for work and planning on air quality issues by setting out the air quality standards and objectives to be achieved. It introduces a new policy framework for tackling fine particles, and identifies potential new national policy measures which modelling indicates could give further health benefits and move closer towards meeting the Strategy's objectives. The objectives of strategy are to:</p> <ul style="list-style-type: none"> • Further improve air quality in the UK from today and long term. <p>Provide benefits to health, quality of life and the environment.</p>	Include a sustainability objective relating to air quality.
Working with the grain of nature – A Biodiversity Strategy for England (2011))	This Strategy seeks to protect and improve the rural, urban, marine and global environment and lead on the integration of these with other policies across Government and internationally.	Include a sustainability objective relating to the protection and enhancement of biodiversity.
Legislation		
Housing and Planning Act (2016)	The Act makes widespread changes to housing policy at the national level. Measures introduced in the Act relate to starter homes, and permitting the sale of higher value local authority homes. Starter homes are the new affordable housing product designed by the government to specifically meet the housing needs of younger generations and to allow them to access home-ownership. The overarching aim of the Act is to promote home ownership and increase levels of house building.	Include a sustainability objective relating to the provision of an appropriate range of housing within the Plan area.
Localism Act (2011)	<p>The Localism Act introduces a number of measures to decentralise decision making process to the local level, creating space for Local Authorities to lead and innovate, and giving people the opportunity to take control of decisions that matter to them. The Localism Act includes a number of important packages.</p> <ul style="list-style-type: none"> • The new act makes it easier for local people to take over the amenities they love and keep them part of local life; • The act makes sure that local social enterprises, volunteers and community groups with a bright idea for improving local services get a chance to change how things are 	<p>To ensure the concepts of the Localism Act are embedded within the SA framework.</p> <p><i>Relates to the overall SA process.</i></p>

Plan or programme	Key objectives relevant to the Local Plan and SA	Implications for the SA
	<p>done.</p> <ul style="list-style-type: none"> • The act places significantly more influence in the hands of local people over issues that make a big difference to their lives. • The act provides appropriate support and recognition to communities who welcome new development. • The act reduces red tape, making it easier for authorities to get on with the job of working with local people to draw up a vision for their area's future. • The act reinforces the democratic nature of the planning system passing power from bodies not directly to the public, to democratically accountable ministers. • The act enables Local Authorities to make their own decisions to adapt housing provision to local needs, and make the system fairer and more effective. • The act gives Local Authorities more control over the funding of social housing, helping them plan for the long- term. <p>In relation to planning, the Localism Act enables the Government to abolish regional spatial strategies, introduce Neighbourhood Plans and Local Referendums.</p>	
The Climate Change Act (2008)	<p>The Climate Change Act was passed in 2008 and established a framework to develop an economically credible emissions reduction path. It also strengthened the UK's leadership internationally by highlighting the role it would take in contributing to urgent collective action to tackle climate change under the Kyoto Protocol.</p> <p>The Climate Change Act includes the following:</p> <ul style="list-style-type: none"> • 2050 target. The act commits the UK to reducing emissions by at least 80% in 2050 from 1990 levels. This target was based on advice from the CCC report: Building a Low- carbon Economy. The 80% target includes GHG emissions from the devolved administrations, which currently accounts for around 20% of the UK's total emissions. <p>Carbon Budgets. The Act requires the Government to set legally binding 'carbon budgets'. A carbon budget is a cap on the amount of greenhouse gases emitted in the UK over a five-year period. The first four carbon budgets have been put into legislation and run up to 2027.</p>	Include a sustainability objective relating to climate change.
Energy Act (2008)	<p>The Act works towards a number of policy objectives including carbon emissions reduction, security of supply, and competitive energy markets. Objectives: Electricity from Renewable Sources: changes to Renewables Obligation (RO), designed to increase renewables generation, as well as the effectiveness of the RO.</p> <p>Feed in tariffs for small scale, low carbon generators of electricity. Smart meters: the Act mandates a roll-out of smart meters to medium sized businesses over the next five years.</p> <p>Renewable heat incentives: the establishment of a financial support mechanism for those generating heat from renewable sources.</p>	Include a sustainability objective relating to energy efficiency and climate change.
Flood and Water Management Act (2010)	The Act aims to reduce the flood risk associated with extreme weather. It provides for better, more comprehensive management of flood risk for people, homes and businesses, helps	The overview of flood risk management in England

Plan or programme	Key objectives relevant to the Local Plan and SA	Implications for the SA
	safeguard community groups from unaffordable rises in surface water drainage charges, and protects water supplies to the consumer.	which is provided in the Act will need to be reflected in the Framework of the SA.
Town and country planning legislation	<p>A range of legislation published in 2017 is of relevance to the Local Plan. This includes:</p> <ul style="list-style-type: none"> - The Neighbourhood Planning Act 2017 – Act aims to strengthen neighbourhood planning by ensuring that planning decision- makers take account of well-advanced neighbourhood development plans and by giving these plans full legal effect at an earlier stage. - The Town and Country Planning (Brownfield Land Register) Regulations 2017 - The <u>regulations</u> require local authorities to prepare and maintain registers of brownfield land that is suitable for residential development. - The Town and Country Planning (Permission in Principle) Order 2017 the <u>Order</u> provides that sites entered on Part 2 of the new brownfield registers will be granted permission in principle. <p>The regulations and order above aim to improve the quality and consistency of data held by local planning authorities, which will provide certainty for developers and communities, encouraging investment in local areas.</p>	These provide background to the SA and Neighbourhood Planning process.
Planning (Listed Buildings & Conservation Areas) Act 1990	This Act details the requirements for listing buildings of special architectural or historic interest and identifying conservation areas. The Act details requirements for works to these or that may otherwise affect these. It aims to ensure that such requirements are enforced and to prevent deterioration of and damage to special buildings and areas.	Include a sustainability objective / appraisal questions relating to the historic environment.
Ancient Monuments & Archaeological Areas Act 1979	This Act makes provision for investigation, preservation and recording of matters of archaeological and historic interest, in particular ancient monuments and areas of archaeological importance and activities affecting these.	Include a sustainability objective/ appraisal questions relating ancient monuments and archaeological areas.



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Hailsham Neighbourhood Plan

Non-Technical Summary of Sustainability Appraisal (incorporating Strategic Environmental Assessment)

Prepared by LUC
March 2019

Project Title: Hailsham Neighbourhood Plan Sustainability Appraisal

Client: Hailsham Town Council

Version	Date	Version Details	Prepared by	Checked by	Approved by
1.0	19/12/18	Draft for client comment	Olivia Dunham Calum McCulloch	Sarah Smith	Philip Smith
2.0	13/03/19	Final for consultation	Sarah Smith Olivia Dunham	Sarah Smith	Philip Smith



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Hailsham Neighbourhood Plan

Non-Technical Summary of Sustainability Appraisal (incorporating Strategic Environmental Assessment)

Prepared by LUC
March 2019

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Introduction

- 1.1 This Non-Technical Summary relates to the Sustainability Appraisal (SA) Report for the Hailsham Neighbourhood Plan (NDP). The NDP is being produced by the Town Council of Hailsham and will set out the area's requirements for new development.
- 1.2 The SA process involves appraising the likely social, environmental and economic effects of the policies within a plan from the outset of its development. A Scoping Report was prepared by LUC in October 2018, which determined the NDP may result in likely significant environmental effects. This is primarily due to the fact that the Neighbourhood Plan area contains and is in close proximity to internationally designated biodiversity sites. Other identified effects relate primarily to cultural heritage assets, the hydrological regime and water quality and other features of the natural environment.
- 1.3 While development has been allocated to Hailsham through the emerging Wealden Local Plan, this SA considers the effects likely to arise from the Neighbourhood Plan itself.

Hailsham Neighbourhood Plan

- 1.1 The Hailsham Neighbourhood Plan covers the market town and parish of Hailsham, in Wealden District, East Sussex. The town is the largest of the five main towns within Wealden, with a population of approximately 24,600¹.
- 1.2 The town is located approximately 5 km north of Polegate and 15 km north of Eastbourne, which is the nearest large town. These towns were previously connected to each other by rail, though the route through Hailsham was removed in 1968 as a result of the Beeching cuts. Main road connections to and from the town comprise the A22 and A27, which connect to Polegate and Eastbourne to the south and Crawley, Horsham and Brighton to the west.
- 1.3 The town sits amongst the lowland forests and marshes of the Sussex Weald and is a gateway to the South Downs National Park. Close to the town is the Pevensey Levels: a low-lying wetland of national and international conservation importance. It is designated as a Site of Special Scientific Interest, a National Nature Reserve, a Ramsar Site, and Special Area of Conservation. It comprises an extensive drainage network and is vulnerable to the effects of climate change and eutrophication.
- 1.4 The town has experienced significant expansion since 1945, and while the town centre, which includes 29 listed buildings, provides the focus for the social and commercial uses, there are large areas of mostly residential development within the town.
- 1.5 A key sustainable travel link is provided by the Cuckoo Trail. This 14 mile long trail along the former railway line links Heathfield to Eastbourne Park, running north to south through Hailsham. Further context and background information about the Hailsham area is set out in Chapter 3 and Appendix 3 of the main SA report.
- 1.6 The Hailsham Neighbourhood Plan is being prepared to set out the local community's aspirations for Hailsham over the period to 2028 in relation to land use and development. Its policies will influence future planning applications and decisions in the area.
- 1.7 The Plan will not allocate specific areas for development; this will be undertaken by Wealden District Council (WDC) through the Wealden Local Plan. Instead, the Neighbourhood Plan seeks to manage new development to ensure a higher quality of development in the town than has been achieved in the past.
- 1.8 The Plan will focus on better design of built development form, reducing the reliance on the private car, enhancing sustainable transport links, improving the town centre and helping to mitigate impacts of new development on the natural and historic environment. The Plan will also set out the Town Council's ambitions in relation to Community Infrastructure Levy (CIL) funding.

¹ 2014 ONS mid-year estimates

Sustainability Appraisal (incorporating Strategic Environmental Assessment)

- 1.9 SA is designed to ensure that the plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process involves appraising the likely social, environmental and economic effects of the policies and proposals within a plan from the outset of its development.
- 1.10 The National Planning Policy Framework (NPPF) states that:
"Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. 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)".
- 1.11 SEA is also a statutory assessment process, required under the SEA Directive², transposed in the UK by the SEA Regulations (Statutory Instrument 2004, No 1633). The SEA Regulations require the formal assessment of plans and programmes which are likely to have significant effects on the environment and which set the framework for future consent of projects requiring Environmental Impact Assessment (EIA)³. The purpose of SEA, as defined in Article 1 of the SEA Directive is 'to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans....with a view to promoting sustainable development'.
- 1.12 SEA and SA are separate processes but have similar aims and objectives. Simply put, SEA focuses on the likely environmental effects of a plan whilst SA includes a wider range of considerations, extending to social and economic impacts. National Planning Practice Guidance⁴ shows how it is possible to satisfy both requirements by undertaking a joint SA/SEA process, and to present an SA report that incorporates the requirements of the SEA Regulations.
- 1.13 In accordance with the instructions of Hailsham Town Council and taking account of the NPPF and positive screening opinion issued by Wealden District Council, the SA/SEA of the Hailsham Neighbourhood Plan is to be undertaken using the joint approach set out above. Throughout this report the abbreviation 'SA' should therefore be taken to refer to 'Sustainability Appraisal incorporating the requirements of Strategic Environmental Assessment'.
- 1.14 **Table 1** below signposts how the requirements of the SEA Regulations have been met within the SA work undertaken to date (presented in the full SA Report and this Non-Technical Summary).

Table 1: Requirements of the SEA Regulations and where these have been addressed in this SA Report

SEA Regulations Requirements	Where covered in this SEA report
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is (Part 3 and Schedule 2 of the SEA Regulations):	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes	Chapter 1, 3 and Appendix 2 of the main SA report and summarised in this NTS.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Chapter 3 and Appendix 3 of the main SA report and summarised in this NTS.

² SEA Directive 2001/42/EC

³ Under EU Directives 85/337/EEC and 97/11/EC concerning EIA.

⁴ <http://planningguidance.planningportal.gov.uk/>

SEA Regulations Requirements	Where covered in this SEA report
c) The environmental characteristics of areas likely to be significantly affected	Chapter 3 and Appendix 3 of the main SA report and summarised in this NTS.
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	Chapter 3 and Appendix 3 of the main SA report and summarised in this NTS.
e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation	Chapter 3 and Appendix 2 of the main SA report and summarised in this NTS.
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors ⁵ .	Chapter 5 of the main SA report and summarised in this NTS.
g) h) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Chapter 6 of the main SA report and summarised in this NTS.
i) j) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapter 2 and Appendix 4 of the main SA report and summarised in this NTS.
k) l) a description of measures envisaged concerning monitoring in accordance with Reg. 17;	Chapter 6 of the main SA report and summarised in this NTS.
m) a non-technical summary of the information provided under the above headings	Addressed through this NTS.
The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Reg. 12(3))	Addressed throughout the SA report and this NTS.
<p>Consultation:</p> <ul style="list-style-type: none"> • authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Reg. 12(5)) 	The SA Scoping Report was subject to consultation with the statutory consultees from 7 th November 2018 until 13 th December 2018.

⁵ These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects

SEA Regulations Requirements	Where covered in this SEA report
<ul style="list-style-type: none"> authorities with environmental responsibility and the public, shall be given an effective opportunity to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Reg. 13(3), 13(4)) 	<p>This SA Report will be published for consultation alongside the Submission version of the NDP in spring 2019.</p>
<ul style="list-style-type: none"> other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Reg. 14). 	<p>N/A</p>
Taking the environmental report and the results of the consultations into account in decision-making (Reg. 16)	
<p>Provision of information on the decision: When the plan or programme is adopted, the public and any countries consulted under Reg.s 13 and 14 must be informed and the following made available to those so informed:</p> <ul style="list-style-type: none"> the plan or programme as adopted a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report of Reg. 12, the opinions expressed pursuant to Reg. 13(2)(d) and the results of consultations entered into pursuant to Reg. 14(4) have been taken into account, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and the measures decided concerning monitoring (Reg. 16(4)(f)) 	<p>To be addressed after the NDP is adopted.</p>
<p>Monitoring of the significant environmental effects of the plan's or programme's implementation (Reg. 17)</p>	<p>To be addressed after the NDP is adopted.</p>
<p>Quality assurance: environmental reports should be of a sufficient standard to meet the requirements of the SEA Regulations.</p>	<p>The SA report and this NTS have been produced in line with current guidance and good practice for SA and this table demonstrates where the requirements of the SA Regulations have been met.</p>

1.15 The approach taken to the SA of the Hailsham Neighbourhood Plan is based on current best practice and the guidance on SA, which involves carrying out SA as an integral part of the planning process.

Stage A: Screening

1.16 The SEA Screening Opinion (October 2018) screened the NDP into the SEA and SA process on the basis that it may result in likely significant environmental effects. This is primarily due to the fact that the Neighbourhood Plan area contains and is in close proximity to internationally designated biodiversity sites. Other identified effects relate primarily to cultural heritage assets, the hydrological regime and water quality and other features of the natural environment.

Stage B: Scoping

1.17 The SA Process began in November 2018 with the production of a Scoping Report for the Hailsham Neighbourhood Plan, which was prepared by LUC on behalf of Hailsham Town Council.

- 1.18 The scoping stage of the SA involves understanding the social, economic and environmental baseline for the plan area as well as the sustainability policy context and key sustainability issues.
- 1.19 The most recent versions of the policy review and baseline information can be found in Appendices 2 and 3 of the SA report.
- 1.20 Public and stakeholder participation is an important element of the SA and wider plan-making processes. It helps to ensure that the SA report is robust and has due regard for all appropriate information that will support the NDP in making a contribution to sustainable development. The SA Scoping Report for the Hailsham Neighbourhood Plan was published in November 2018 for a five week consultation period with the statutory consultees (Natural England, the Environment Agency and Historic England). The comments received during the consultation were then reviewed and addressed as appropriate in this SA. Appendix 1 of the SA report lists the comments that were received during the scoping consultation on the SA to accompany the draft NDP and describes how each one was addressed.
- 1.21 **Table 2** below presents the 11 SA objectives in the Hailsham SA framework and shows how the 'SEA topics' (listed in Schedule 2 of the SEA Regulations) that were scoped in to the assessment have been covered by these. Only those issues that have been scoped in to the SA have been included in the below table. The only topic scoped out of the SA is 'soils, as it is not expected that the measures contained within the NDP will have any significant effects on soil quality in Hailsham. As above this is because the NDP will not propose specific sites for new development, rather its aim will be to limit the impact of additional servicing and delivery for new developments. The statutory consultation bodies did not raise any issues with the scoping out of this topic.

Table 2: SA Framework for Hailsham Neighbourhood Plan

SA Objectives	Guidance Questions – will the Plan...?	SA Regulations Topic(s) covered
1 Protect and enhance biodiversity and geodiversity within the Parish.	<ul style="list-style-type: none"> • Protect, conserve and enhance the geodiversity and biodiversity of sites, including habitats that support it, of International, European, national and local importance? • Conserve and enhance habitats and species within the parish, particularly where these are rare, declining, threatened or indigenous? • Avoid where possible, and otherwise minimise, adverse impacts on species and habitats through human activities and development? 	Biodiversity Flora Fauna
2 Conserve and enhance the Parish’s landscape and townscape.	<ul style="list-style-type: none"> • Avoid and minimise negative impacts of future development on the landscape and townscape? • Protect local landscape and townscape quality, distinctiveness and character from unsympathetic development and changes in land management? • Protect local landscape quality, distinctiveness and character from poor access management? 	Landscape
3 Conserve and enhance the Parish’s historic environment and cultural assets.	<ul style="list-style-type: none"> • Maintain the character, setting and appearance of historic assets in the Parish, particularly designated assets? • Maintain and promote access to historic and cultural assets for all, where appropriate? 	Cultural heritage
4 To maintain and improve the water quality of the Parish’s waterbodies and groundwater, and to achieve sustainable water resources management.	<ul style="list-style-type: none"> • Maintain and, where possible, improve the quality and quantity of all water resources? • Incorporate sustainable urban drainage systems (SUDs) and green infrastructure practices into new development? • Ensure that new developments do not lead to a reduction in the quality of ground water, surface water or river water • Lead to the effective management of demand for water, prevent stress on the natural environment and help water users adapt to the impacts of climate change? 	Water Climatic factors

SA Objectives	Guidance Questions – will the Plan...?	SA Regulations Topic(s) covered
5 Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.	<ul style="list-style-type: none"> • Guide inappropriate development away from flood risk areas? • Ensure that where development in flood risk areas is permitted, the risks to people and property are mitigated? • Promote flood resilience and resistance measures in development, including incorporating sustainable urban drainage systems (SUDs) and green infrastructure practices into new development? 	Water Climatic factors
6 Reduce air pollution and minimise traffic, particularly in Hailsham town centre.	<ul style="list-style-type: none"> • Ensure that local air quality is not adversely affected pollution and seek to improve it where necessary? • Limit or reduce the emission of air pollutants? • Promote inclusion of sustainable transport links within the District and reducing the need to travel? 	Air Human Health
7 Minimise greenhouse gas emissions in the Parish.	<ul style="list-style-type: none"> • Limit or reduce the emission of greenhouse gases? • Encourage and promote the use of clean, low carbon energy efficient technologies? • Maximise the use of energy from renewable resources? • Encourage energy-efficient design? • Promote inclusion of sustainable transport links within the District? • Locate development close to existing services and facilities to ease access? 	Climatic Factors Air
8 Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home.	<ul style="list-style-type: none"> • Ensure provision of sufficient levels of affordable housing? • Provide a sufficient mix of housing types and tenures to meet current and future needs of the Parish? • Ensure new housing is good quality, resource efficient and with a reduced environmental impact? 	Population Material Assets
9 Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness?	<ul style="list-style-type: none"> • Deliver education and training which helps everyone develop the values, knowledge and skills necessary to enable them to live, act and work in a sustainable society? • Recognise the need for people to adapt to economic change and retrain where necessary? • Encourage provision of new education facilities and services to support the learning and professional development of the local population? • Enhance access to existing education facilities? 	Population Material Assets

SA Objectives	Guidance Questions – will the Plan...?	SA Regulations Topic(s) covered
10 Facilitate improved health and wellbeing of the population including reducing inequalities in health.	<ul style="list-style-type: none"> • Ensure all members of society have access to the health care that they require? • Reduce health inequalities within society associated with income, lifestyle and diet? • Improve road safety and advocate sustainable modes of transport? • Help create a healthy and safe working and living environment with low rates of crime and disorder? • Help improve quality of life for all? • Anticipate and plan for the potential impacts of climate change on health? • Minimise noise and light pollution? 	Human Health
11 Facilitate a sustainable and growing economy that enhances access to employment and business opportunities.	<ul style="list-style-type: none"> • Increase the number, variety and quality of employment opportunities including those offered by tourism and social enterprise? • Increase access for all to a range of jobs through improved training, sustainable transport and communication links? • Increase and widen future employment opportunities? 	Population Material Assets

SA Stage C: Developing and refining options and assessing effects

- 1.22 Developing options for a plan is an iterative process, usually involving a number of consultations with public and stakeholders. Consultation responses and the SA can help to identify where there may be other 'reasonable alternatives' to the options being considered for a plan.
- 1.23 Regulation 12 (2) of the SEA Regulations requires that:
"The (environmental or SA) report must identify, describe and evaluate the likely significant effects on the environment of—
(a) implementing the plan or programme; and
(b) reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme."
- 1.24 It should be noted that any alternatives considered for the plan need to be "reasonable". This implies that alternatives that are "not reasonable" do not need to be subject to appraisal. Examples of unreasonable alternatives could include policy options that do not meet the overarching Vision and Objectives of the plan or national policy (e.g. the National Planning Policy Framework) or site options that are unavailable or undeliverable.
- 1.25 It also needs to be recognised that the SEA and SA findings are not the only factors taken into account when determining a preferred option to take forward in a plan. Indeed, there will often be an equal number of positive or negative effects identified for each option, such that it is not possible to 'rank' them based on sustainability performance in order to select a preferred option. Factors such as public opinion, deliverability and conformity with national policy will also be taken into account by plan-makers when selecting preferred options for their plan.

Identification and appraisal of options

- 1.26 The options for the NDP were identified through engagement and consultation with the local community. This started with an initial consultation with local people, to identify issues, concerns and areas of focus for the NDP. The Town Council also collected a range of evidence to inform the plan, including a town centre analysis⁶, town wide analysis⁷ and character assessment⁸. The alternative options identified were set out in the Draft emerging Neighbourhood Plan (April 2017). Appendix 4 of the main SA Report sets out the reasons why the policies presented in the Submission Neighbourhood Plan were selected in light of those set out in the Draft emerging Neighbourhood Plan.

SA Stage D: Preparing the Sustainability Appraisal report

- 1.27 The SA Report describes the process that has been undertaken to date in carrying out the SA of the Hailsham Neighbourhood Plan. It sets out the findings of the appraisal of options and measures set out in the NDP, highlighting any likely significant effects (both positive and negative, and taking into account the likely secondary, cumulative, synergistic, short, medium and long-term and permanent and temporary effects as relevant). These are summarised in this NTS.

SA Stage E: Consultation on the Hailsham Neighbourhood Plan and the SA Report

- 1.28 Hailsham Town Council invited comments on the NDP and the main SA report. Both will be published on the Town Council's website in spring 2019.

SA Stage F: Monitoring implementation of the Neighbourhood Plan

- 1.29 Monitoring of social, environmental and economic effects identified should be carried out after adoption of the NDP, therefore recommendations for monitoring the likely significant environmental effects of implementing the NDP are presented in Chapter 6 of the SA report.

⁶ Troy Planning (2017) Hailsham Neighbourhood Plan, Town Centre Analysis

⁷ Troy Planning (2017) Hailsham Neighbourhood Plan, Town Wide Analysis

⁸ Troy Planning (2017) Hailsham Character Assessment

Environmental context

Review of Plans, Policies and Programmes

- 1.30 The Hailsham Neighbourhood Plan is not prepared in isolation, being influenced by other plans, policies and programmes and by broader environmental objectives. It needs to be consistent with international and national guidance and planning policies and should contribute to the goals of a wide range of other programmes and strategies. The NDP must also conform to environmental protection legislation and contribute to achieving the environmental objectives established at the international and national levels.
- 1.31 A review has been undertaken of the other plans, policies and programmes that are relevant to the NDP.

Key international plans, policies and programmes

- 1.32 At the international level, the SEA Directive is particularly important as it sets out the requirements for SEA. SEA should be undertaken iteratively and integrated into the production of the SPD in order to ensure that any potential negative environmental effects are identified and can be mitigated.
- 1.33 There are a wide range of other EU Directives, most of which have been transposed into UK law through national-level policy; the international directives have been included in Appendix 2 of the full SA Report for completeness.

Key national plans, policies and programmes

- 1.34 There is a wide range of national level policies and programmes with relevant objectives for the SA, which are summarised in Appendix 2 of the SA Report. However, the most significant policy context for the NDP is the Localism Act (2011) as it sought to move decision-making away from central government and towards local communities. Part of this included the introduction of Neighbourhood Planning.
- 1.35 Another significant development in terms of the policy context for the Neighbourhood Plan has been the publication of the National Planning Policy Framework (NPPF). The NPPF requires local planning authorities and communities to set out non-strategic priorities for the area in the Neighbourhood Plan. This could include policies to deliver:
- Site allocations for small and medium-sized housing.
 - The provision of infrastructure and community facilities at a local level.
 - Establishing design principles.
 - Conservation and enhancement of the natural and historic environment.

Baseline Information

- 1.36 Information about past trends and the current state of the environment provides a baseline against which to assess the likely sustainability effects of the Neighbourhood Plan and monitoring its outcomes.
- 1.37 Schedule 2 of the SEA Regulations requires data to be gathered on biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the inter-relationship between the above factors. In regard to soil, the effects of the plan on soils have been scoped out of the SA as it is not expected that the measures contained within the Neighbourhood Plan will have any significant effects on soil quality in Hailsham. This is because the Neighbourhood Plan does not allocate sites for development. As an integrated SA and SEA is being carried out, baseline information relating to other 'sustainability' topics has also been included; for example information about housing, social inclusiveness, transport, energy, waste and economic growth. Baseline information was originally presented in the Council's SA Scoping Report, is set out in Appendix 3 in the main SA report and some of the key information is summarised below.

Summary of baseline information

Housing

- 1.38 A significant amount of housing is needed within Wealden with around 2,672 of these homes allocated to Hailsham in the emerging Wealden Local Plan to 2028. Market housing is unaffordable for many residents in Wealden. High quality housing in a mix of types and styles is required to enhance local character and to meet Hailsham's demographic needs, such as an ageing population. **The effects of the Plan on housing have been scoped into of the SA**, as the Plan could influence the type, mix and quality of housing.

Education

- 1.39 Hailsham has a lower than average level of educational attainment than Wealden as a whole. The Infrastructure Delivery Plan prepared in support of the emerging Wealden Local Plan sets out that in Hailsham, primary school places are expected to be in shortfall by 60 places in 2019/2020. Additional capacity within secondary schools is likely to be required after 2022. Lack of public transport may act as a barrier to accessing educational opportunities. **The effects of the Plan on education have been scoped into of the SA**, as the Neighbourhood Plan could improve access to educational opportunities.

Population

- 1.40 Hailsham contains areas with significant levels of deprivation, particularly with regards to income and employment, barriers to housing and services and education, skills and training. There are areas with comparatively higher levels of crime, notably in the west of the Hailsham urban area. Hailsham has an ageing population. **The effects of the Plan on population have been scoped into the SA**, as the Plan could provide policies that help to address deprivation and the needs of the ageing population in the Plan area.

Health

- 1.41 There are incidences of a number of health conditions within Hailsham, including chronic obstructive pulmonary disease, adult and childhood obesity, cancer, diabetes and dementia. Hailsham has an ageing population, which has specific needs to maintain and promote health. There are health discrepancies between more and less deprived areas of Hailsham. Accessibility of open spaces varies within the Plan area. The network of pedestrian routes is incomplete and the Cuckoo Trail is poorly integrated with the town centre. **The effects of the Plan on health have been scoped into the SA**, as the Plan could provide policies that help to improve health in the Plan area.

Air quality, noise and traffic

- 1.42 There are no designated air quality management areas within Hailsham, or Wealden District. The structure of the road network in Hailsham focusses routes through the town centre, which can result in congestion at key junctions and relatively high volumes of traffic along North Street. There are concerns regarding high levels of noise generated by road traffic within Hailsham Town Centre. **The effects of the Plan on air quality, noise and traffic have been scoped into the SA**, as the Plan could influence air quality, noise and traffic within the Plan area.

Economy

- 1.43 The percentage of the parish population that is economically active is lower than regional and national averages. However, unemployment levels for Hailsham remain lower than regional and national averages. **The effects of the Plan on the economy have been scoped into the SA**, as the Plan could influence economic growth and activity in the parish.

Soils

- 1.44 Hailsham town is unclassified as 'urban' while the majority of the surrounding rural area within the Plan area is classified as Grade 3 (good to moderate quality agricultural land). **The effects of the Plan on soils have been scoped out of the SA**, as it is not expected that the measures contained within the Neighbourhood Plan will have any significant effects on soil quality in Hailsham. This is because the Neighbourhood Plan does not allocate sites for development.

Water quality and resources

- 1.45 The Neighbourhood Plan area overlaps with the Cuckmere and Pevensey Levels catchments. Environment Agency data for the catchments show many of the rivers in the catchment area are classified as 'moderate' to 'poor' in terms of chemical, ecological and biological status along their lengths. New development could adversely affect water quality, particularly of the sensitive Pevensey Levels, due to increased surface water runoff, increased water abstraction and increased effluent discharge at wastewater sewage works. **The effects of the Plan on water quality and resources have been scoped into the SA**, as the Plan could ensure that development is designed in a way that mitigates adverse effects on water supply and water quality.

Climate change mitigation

- 1.46 The population of Wealden consumes greater amounts of gas and electricity than national average levels. There is poor access to train services via public transport, leading to reliance on private vehicle transport. In 2014, four solar energy schemes were approved in the Lower Weald. Despite this, Wealden has a relatively low number of operational renewable energy schemes within the district. **The effects of the Plan on climate change mitigation have been scoped into the SA**, as the Plan could help to minimise emissions of carbon dioxide and other greenhouse gases.

Climate change adaptation

- 1.47 There are existing and future flood risk issues, such as those associated with the Splent Crescent, Upper Horsebridge Road and Diplocks Way. In 2010, some 27,611 properties were affected by localised flooding events in the county of East Sussex. In 2115, due to sea level rise, the future Flood Zone 3 (land at high risk of flooding) is predicted to encroach on the southern and western fringes of Hailsham. Wealden's Green Infrastructure Study found that green infrastructure such as The Cuckoo Trail and an urban green grid for Hailsham may assist in adapting to climate change. **The effects of the Plan on climate change adaptation have been scoped into the SA**, as the Plan could help to ensure that the parish, including any new development, is able to adapt to climate change.

Biodiversity and geodiversity

- 1.48 There are a number of sensitive habitats and designated sites within and within proximity of the parish. The Pevensey Levels are subject to a number of threats. There are three areas of Ancient Woodland within Hailsham. **The effects of the Plan on biodiversity and geodiversity have been scoped into the SA**, as the Plan could help to ensure that development avoids significant adverse effects on the biologically diverse sites within and around Hailsham.

Historic Environment

- 1.49 There are a number of heritage designations within Hailsham including 57 listed buildings (Grades I, II* and II) and one Scheduled Monument. There are currently no heritage assets at risk within Hailsham. However, there are potential conflicts between the protection of heritage assets and mitigating the impact of climate change. **The effects of the Plan on the historic environment have been scoped into the SA**, as the Plan could ensure that development is not detrimental to the character of Hailsham's historic environment.

Landscape

- 1.50 The Plan area is covered by four character areas, as outlined in the Wealden Landscape and Settlement Character Assessment 2014. These are the Eastern Low Weald, Pevensey Levels, South Slope of High Weald, and Hailsham Character areas. Large industrial and commercial buildings in the south of the town, a sewage works to the south east of the town and a Chalet Park also at the eastern edge of the town are considered to have an adverse effect on the landscape. **The effects of the Plan on landscape have been scoped into the SA**, as the Plan could ensure that development is designed in a way that conserves and enhances landscape.

Key Sustainability Issues

- 1.51 An up-to-date set of key sustainability issues for Hailsham was identified during the scoping stage of the SA and were presented in the Scoping Report. **Table 3** shows the key sustainability issues and the likely evolution of these if the Hailsham Neighbourhood Plan were not to be implemented.

Table 3 Key Sustainability Issues for the Hailsham Neighbourhood Plan

Key issues	Likely evolution without the Neighbourhood Plan
Population	
<p>Hailsham contains areas with significant levels of deprivation, particularly with regards to income and employment, barriers to housing and services and education, skills and training.</p> <p>There are areas comparatively higher levels of crime, notably in the west of the Hailsham urban area.</p> <p>Hailsham has an ageing population.</p>	<p>Without the Neighbourhood Plan, population trends are likely to continue, including a rise in average age and associated age-related medical conditions, in line with the national trend of an ageing population. However, the Plan provides an opportunity to ensure development caters to the needs of an older population, which may otherwise be overlooked.</p> <p>Levels of deprivation and crime are not expected to change significantly without the Plan in place, although the emerging Wealden Local Plan contains policies that could address these issues to some extent. The Plan could further encourage measures to reduce crime and deprivation.</p>
Housing	
<p>A significant amount of housing is needed within Wealden with around 2,672 of these homes allocated to Hailsham in the emerging Wealden Local Plan to 2028.</p> <p>Market housing is unaffordable for many residents in Wealden. As such, a suitable proportion newly built housing must be made affordable.</p> <p>High quality housing in a mix of types and styles is required to enhance local character and to meet Hailsham's demographic needs, such as an ageing population.</p>	<p>Without the Neighbourhood Plan, delivery of the required number of houses (including affordable homes) with a mix of housing types will, to a large extent, be delivered through policies within the Wealden District Local Plan. The Plan could help to ensure housing is of a sufficient type and quality to meet local needs.</p>
Health	
<p>There are incidences of a number of health conditions within Hailsham, including chronic obstructive pulmonary disease, adult and childhood obesity, cancer, diabetes and dementia.</p> <p>Hailsham has an ageing population, which has specific needs to maintain and promote health.</p> <p>There are health discrepancies between more and less deprived areas of Hailsham.</p> <p>New housing development will create an additional need for open space, sports and recreational facilities.</p> <p>Accessibility of open spaces varies within the Plan area.</p> <p>The network of pedestrian routes is incomplete.</p>	<p>The emerging Wealden Local Plan includes policies that promote improved health and wellbeing across the district. However the Plan has the opportunity to provide more detailed policies that help to improve the health outcomes for its residents. This includes policies relating to transport, open space, community facilities, design, and the town centre.</p> <p>Specific policies for new or improved open space, sport and recreation provision with planned development are provided in some site allocation policies in the Wealden Local Plan. However, the Plan can provide more detailed policy to inform the design of open spaces provided within new developments. The Plan can also set out site-specific GI and open space proposals for open spaces outside major developments as these are not set out in the Local Plan.</p>
Education	
<p>Hailsham has a lower than average level of educational attainment than Wealden as a whole.</p> <p>Hailsham has a shortfall in primary school</p>	<p>The Local Education Authority is responsible for securing the required number of school places, although the Wealden Local Plan can help to identify sites for new educational facilities and requirements for developers to contribute towards these. The Plan vision aims to provide new and improved educational opportunities</p>

<p>places available.</p> <p>Additional capacity within secondary schools is likely to be required after 2022.</p> <p>Lack of public transport may act as a barrier to accessing educational opportunities.</p>	<p>through growth and could help to increase access to these.</p>
Economy	
<p>The percentage of the parish population that is economically active is lower than regional and national averages.</p>	<p>Despite rising workforce projection figures for the Wealden district between 2018 and 2031, the Wealden Economy Study⁹ suggests that the existing stock of employment premises are of sub-optimal quality and will need future investment. The Plan presents an opportunity to address these issues by ensuring new office and other employment premises are of sufficient quality. It is also possible that the percentage of the workforce that is economically active will decline, due to the national trend of an ageing population. This is not a factor that the Plan can influence.</p>
Air quality, noise and traffic	
<p>There are safety concerns and conflicts between different types of traffic in Hailsham Town Centre.</p> <p>The pedestrian network is incomplete.</p> <p>There are concerns regarding high levels of noise generated by road traffic within Hailsham Town Centre.</p>	<p>Policies within the emerging Wealden Local Plan will prevent, to a large extent, the adverse effects of noise, air quality, and traffic from new development. However, without the Plan, site-specific issues could be overlooked. The Plan may also contain detailed policies that help to mitigate adverse impacts of air quality, noise and traffic such as policies relating to transport, housing design and green infrastructure.</p>
Biodiversity and geodiversity	
<p>There are a number of sensitive habitats and designated sites within and within proximity of the parish.</p> <p>The Pevensey Levels are subject to a number of threats.</p>	<p>Adverse impacts to the Pevensey Levels could increase due to population growth, development and recreational pressures. However, the Plan has the opportunity to ensure that measures are put in place to ensure that development does not have a significant adverse impact on the Pevensey Levels. Globally, there has been a decline in biodiversity in recent years. In the UK specifically, over 40% of priority habitats and 30% of priority species were declining in the most recent analysis.¹⁰</p>
Climate change mitigation	
<p>The population of Wealden consumes greater amounts of electricity than national average levels.</p> <p>There is poor access to train services via public transport, leading to reliance on private vehicle transport.</p>	<p>It is likely that the impacts of climate change will continue to affect those living in Hailsham and all other areas of the UK. Given that the impacts of this issue are expected to worsen and intensify, it is likely that there will be added strains on existing infrastructure within Hailsham. Without the implementation of the Plan, mitigation measures such as electric cars may not be as readily available or accessible for use within the community.</p>
Climate Change adaptation	

⁹ Regeneris Consulting for Wealden District Council, Wealden Economy Study, December 2016

¹⁰ Biodiversity 2020: A strategy for England's wildlife and ecosystem services, 2011

<p>There are existing and future flood risk issues, such as those associated with the Splent Crescent, Upper Horsebridge Road and Diplocks Way.</p> <p>Current amounts of green infrastructure within Hailsham may not be sufficient enough to address future climate change effects within Hailsham.</p>	<p>As climate change effects are likely to be continually felt in Hailsham and in other parts of the UK, increasingly, there will be a need for local services and infrastructure to adapt and meet the needs of future populations. The Plan could help to ensure that buildings and associated infrastructure will be constructed to incorporate climate change resilience.</p>
Landscape	
<p>Large industrial and commercial buildings in the south of the town, a sewage works to the south east of the town and a Chalet Park also at the eastern edge of the town are considered to have an adverse effect on the landscape.</p> <p>New development could adversely affect landscape if not designed carefully.</p>	<p>Hailsham’s landscape would largely be protected by policies within the Wealden District Local Plan. However, the Plan provides an opportunity to provide more detailed policy in relation to design and local distinctiveness, thereby helping to conserve and enhance the landscape.</p>
Historic Environment	
<p>Potential conflicts between the protection of heritage assets and mitigating the impact of climate change. For example, where homeowners wish to install renewable energy features, such as solar PV arrays on roofs in a conservation area or on a listed building, this may adversely affect the heritage significance of the building or surrounding area.</p> <p>Adaptation to climate change and flood risk mitigation measures should have regard to the character of the historic environment.</p> <p>Loss of appropriate training/skills and materials to maintain the character and distinctiveness.</p> <p>Potential lack of access to and understanding of the historic environment.</p>	<p>There will be no change to the baseline in the absence of the Plan, due to protection of designated features through national policy and also through policies in the Wealden Local Plan that promote conservation of the historic environment. However, the Plan has the opportunity to ensure that any new development is undertaken with the aim of conserving and enhancing the historic environment.</p>
Water quality and water resources	
<p>New development could adversely affect water quality, particularly of the sensitive Pevensey Levels, due to increased surface water runoff, increased water abstraction and increased effluent discharge at wastewater sewage works.</p> <p>New development could increase pressure on water resources due to increased water-abstraction.</p> <p>Climate change could put pressure on water resources and could adversely affect water quality because of increased occurrences of drought and extreme rain.</p>	<p>Adverse effects on water quality and water resources are likely to be mitigated to a large extent by policies within the Wealden District Local Plan and by the Environment Agency’s licensing regimes for water abstraction and discharges. However, the Plan provides an opportunity to ensure development adopts sustainable design and construction techniques that could help to mitigate adverse effects on water supply and quality, e.g. sustainable drainage systems (SUDS), provision of green infrastructure, or grey water recycling.</p>

Appraisal methodology

- 1.52 The policies set out in the Neighbourhood Plan and their reasonable alternatives have been appraised against 11 SA objectives in the SA framework (see **Table 2** earlier in this NTS), with scores being attributed to each option or preferred approach to indicate its likely sustainability effects on each objective as shown in **Table 4**.

Table 4: Key to symbols and colour coding used in the SA of the Hailsham Neighbourhood Plan

++	The option is likely to have a significant positive effect on the SA objective(s).
+	The option is likely to have a positive effect on the SA objective(s).
0	The option is likely to have a negligible or no effect on the SA objective(s).
-	The option is likely to have a negative effect on the SA objective(s).
--	The option is likely to have a significant negative effect on the SA objective(s).
?	It is uncertain what effect the option will have on the SA objective(s), due to a lack of information.
+/-	The option is likely to have a mixture of positive and negative effects on the SA objective(s).

- 1.53 Where a potential positive or negative effect is subject to uncertainty, for example because the outcome will be reliant on events or actions by third parties, a question mark has been added to the relevant score (e.g. +? or -?) and the score is colour coded as per the potential positive, negligible or negative score (i.e. green, red etc.).

Difficulties Encountered

- 1.54 It is a requirement of the SEA Regulations that consideration is given to any data limitations or other difficulties that are encountered during the SA process and these are outlined below.
- 1.55 WDC carried out HRA screening of the Submission NDP. This screening relates to the submission version policies and has been used to inform the SA, but there was not an equivalent for the draft emerging policies.
- 1.56 Each policy has been assessed individually in **Chapter 5** of the main report, and therefore, when assessing the draft emerging policies against SA objective 1, potential likely significant effects identified in the HRA screening were taken into account, where similar impacts were considered likely to arise. The Cumulative Effects section of **Chapter 5** of the main report considers the likely effects of the NDP as a whole, and therefore incorporates the findings of the Appropriate Assessment, which assessed whether the likely significant effects identified at the screening stage would result in adverse effects on integrity of any European sites. The Appropriate Assessment is relevant to in-combination effects as it concludes that there will be no adverse effects on integrity of European sites as a result of safeguarding policies contained within the NDP and the emerging Wealden Local Plan. As such, adverse effects on European sites are only avoided when the plan is considered as a whole and in-combination with the Wealden Local Plan.

SA findings for the Neighbourhood Plan

- 1.57 The main report includes an assessment of each policy individually, but in reality policies do not act in isolation – they should be considered in the context of the plan as a whole. This section sets out the cumulative effects of the Neighbourhood Plan, i.e. an assessment of the plan as a whole, taking into account all its constituent policies.

SA Objective 1: Protect and enhance biodiversity and geodiversity within the Parish

- 1.58 Mixed effects were recorded for this SA objective. Significant negative uncertain effects were recorded where the HRA screening identified that a likely significant effect could not be ruled out on the basis that development could result in increased traffic congestion and air pollution, recreational pressures and hydrological impacts on the European sites in the parish and surrounding areas. However, an Appropriate Assessment has been completed, which concluded that the NDP will not adversely affect the integrity of the European sites due to the inclusion of Policy HRA1 and relevant policies within the submission version of the Wealden Local Plan (Policy AF1, AF2, SWGA7 and SWGA8). Therefore, no significant negative effects are expected when the plan is considered as a whole, and alongside the emerging Wealden Local Plan.
- 1.59 Some policies are expected to have minor or significant positive effects with uncertainty in relation to this objective, as they require protection and/or enhancement of biodiversity features. Policy HRA1 protects against significant adverse effects on designated European sites, notably the Ashdown Forest Special Area of Conservation (SAC) and Special Protection Area (SPA); the Pevensy Levels Ramsar Site and SAC and Lewes Downs SAC, thereby helping to protect biodiversity by preserving the ecological integrity of these sites. Additionally, any proposals for development must be accompanied by information to allow an HRA of the development to be completed; thereby ensuring development does not adversely affect the sites. This policy could work in tandem with Policy AQ2 and P1 to have an overall positive effect as they enhance habitats and protect biodiversity. In addition, Policy GS1 supports proposals that create new wildlife habitats, connect, enhance and retain existing wildlife habitats.
- 1.60 The plan does not directly propose development. Where policies support development, this is likely to be small-scale and located within existing urban areas or existing development sites. Considering this and the biodiversity protections within policies such as HRA1, **cumulative minor positive effects** are expected with regards to SA objective 1.

SA Objective 2: Conserve and enhance the Parish's landscape and townscape

- 1.61 The majority of policies are expected to have minor or significant positive effects in relation to this objective. Policy D1 encourages development that implements green walls, roofs and SUDs, as well as adopt designs that respond to the surrounding townscape and landscape and display a high level of architectural quality which responds positively to local context. This policy could work in tandem with Policies SD1 and TC2 to have an overall positive effect, as they promote the use of best practice design principles that respond positive to the character and qualities of the town centre.
- 1.62 One policy (AQ4) is expected to have a mixed minor positive and minor negative effect with uncertainty on this objective. The policy states that applications for renewable energy schemes will be required to demonstrate that they do not have a significant adverse effect on landscape and townscape character, installation of what is often large scale energy generation infrastructure could still cause minor harm to the area. However, renewable and low carbon energy schemes may not be large scale resulting in an uncertain effect.
- 1.63 The rest of the policies are expected have a negligible effect.
- 1.64 As such, **cumulative significant positive effects** are expected with regards to SA objective 2.

SA Objective 3: Conserve and enhance the Parish's historic environment and cultural assets

- 1.65 The majority of policies are expected to have a negligible effect on this objective.

- 1.66 Most of the remaining policies are expected to have a minor or significant positive effect on this objective. Policies TC3 and TC5 are likely to work in combination to ensure that developments undertaken in the Town Centre will preserve and enhance the ancient market town character including the conservation area and listed and locally listed buildings.
- 1.67 Policy AQ4 is the only policy that is likely to have a mixed minor positive and minor negative effect on this objective. The policy states that applications for renewable energy schemes will be required to demonstrate that they do not have a significant adverse effect on heritage or cultural assets, installation of what is often large scale energy generation infrastructure could still cause minor harm to the area. However, renewable and low carbon energy schemes may not be large scale resulting in an uncertain effect.
- 1.68 As such, **cumulative minor positive effects** are expected.

SA Objective 4: To maintain and improve the water quality of the Parish's waterbodies and groundwater, and to achieve sustainable water resources management

- 1.69 The majority of policies are expected to have a negligible effect on this objective.
- 1.70 Five policies are expected to have a minor or significant positive effect on this objective. Policies HRA1 and GS1 are likely to work in combination to reduce the likelihood of development having an adverse effect on water quality and encourage the use of SUDs which could help to conserve and enhance water quality and reduce the risk flooding by reducing the risk of surface water runoff.
- 1.71 Four policies are expected to have a minor negative effect on this objective. Any development, such as that which could come forward under Policies EMP1 and CF1, could have hydrological impacts as they could increase the area of impermeable surfaces in the parish. However, this is likely to be mitigated by policies that support provision of green infrastructure and SUDS, such as Policies D1, GS1 and GS3.
- 1.72 As such, **cumulative minor positive effects** are expected.

SA Objective 5: Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment

- 1.73 The majority of policies are expected to have a negligible effect on this objective.
- 1.74 Six policies are expected to have a minor or significant positive effect on this objective. Policies GS1 and AQ2 are likely to work in combination to minimise the impact on flood risk and encourage the use of SUDs which could help to conserve and enhance water quality and reduce the risk flooding by reducing the risk of surface water runoff.
- 1.75 As such, **cumulative minor positive effects** are expected.

SA Objective 6: Reduce air pollution and minimise traffic, particularly in Hailsham town centre

- 1.76 Over half of the policies are expected to have a minor or significant positive effect on this objective (some as part of a mixed effect). Policies AT1 to AT3 are likely to work in combination to encourage active and sustainable travel through promoting delivery of walking and cycling routes that reduce reliance on vehicular movements. As such, these policies will help to promote sustainable transport links thereby minimising traffic congestion and associated air pollution.
- 1.77 Five policies are expected to have a mixed minor positive and negative effect on this objective. These have potential to increase traffic congestion and air pollution within Hailsham; however they also encourage the use of sustainable modes of transport.
- 1.78 Policies TC4 and D2 are expected to have a minor negative effect on this objective. This is because the policy encourages development to consider the provision of public parking, which may encourage residents to travel by car, thereby increasing the likelihood of air pollution from vehicular emissions.
- 1.79 Given the strong emphasis of the plan on the provision of sustainable transport, **cumulative minor positive effects** are expected.

SA Objective 7: Minimise greenhouse gas emissions in the Parish

- 1.80 The majority of policies are expected to have a minor or significant positive effect on this objective (some as part of a mixed effect). Policies AT1 to AT3 are likely to work in combination to encourage sustainable and active travel through delivery of walking and cycling routes that reduce reliance on vehicular movements. As such, these policies will help to promote sustainable transport links thereby minimising greenhouse gas emissions from vehicles.
- 1.81 Five policies are expected to have a mixed minor positive and negative effect on this objective. These policies have the potential to increase greenhouse gas emissions within Hailsham; however they also encourage the use of sustainable modes of transport.
- 1.82 Policies TC4 and D2 are expected to have a minor negative effect on this objective. This is because the policy encourages development to provide of public parking, which may encourage residents to travel by car, thereby increasing the likelihood of emitting greenhouse gas emissions from vehicular transport.
- 1.83 The remaining policies are expected to have a negligible effect on this objective.
- 1.84 Given the strong emphasis of the plan on the provision of sustainable transport, **cumulative minor positive effects** are expected.

SA Objective 8: Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home

- 1.85 The majority of policies are expected to have a negligible effect on this objective.
- 1.86 Three policies are expected to have a minor positive effect on this objective. Policies D1, AQ2 and SD2 are likely to work in combination to encourage the use of sustainable features and increase the quality of housing development through ensuring development proposal undertakes the Building for Life 12 Assessment and the Home Quality Mark Assessment.
- 1.87 As such, **cumulative minor positive effects** are expected.

SA Objective 9: Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness

- 1.88 The majority of policies are expected to have a negligible effect on this objective.
- 1.89 Three policies are expected to have a minor positive effect on this objective. Policies AT1 and AT3 encourage sustainable transport links, which may help residents with to access educational facilities. In addition, Policy SD1 requires developers to produce a land use plan that shows broad locations of supporting services, such as education.
- 1.90 Policies EMP1 and CF1 are expected to have a significant positive effect on this objective. Policy EMP1 is likely to help to improve training and skills by supporting the provision local employment opportunities and policy CF1 supports the enhancement and provision of community facilities for education purposes.
- 1.91 As such, **cumulative minor positive effects** are expected.

SA Objective 10: Facilitate improved health and wellbeing of the population including reducing inequalities in health

- 1.92 The majority of policies are expected to have a minor or significant positive effect on this objective. Policies AT1 to AT2 are likely to work in combination to encourage active travel through delivery of walking and cycling routes. As such, these policies will help to promote physical activity and will contribute to minimising traffic, thereby improving health and wellbeing and providing a link to community and recreation facilities. These policies may help to ensure that key services and facilities, such as community facilities provided under Policy CF1, are accessible.
- 1.93 The remaining policies are expected to have a negligible effect on this objective.
- 1.94 As such, **cumulative significant positive effects** are expected.

SA Objective 11: Facilitate a sustainable and growing economy that enhances access to employment and business opportunities

- 1.95 The majority of policies are expected to have a negligible effect on this objective.
- 1.96 Eight policies are expected to have a minor or significant positive effect on this objective. In particular, Policy TC1 (Hailsham Town Centre) and Policy EMP1 (Providing for a mix of employment opportunities) are likely to work in combination to encourage development that will broaden the retail offer, enhance the town's image as a destination for shopping and improve the range and quality of office and business accommodation. Finally, Policy HRA1 requires all new development to have the ability to connect to high speed broadband which allows residents to work from home and gives them increased access to search for employment opportunities, therefore facilitating a growing economy and increasing connectivity to employment and business opportunities
- 1.97 As such, **cumulative minor positive effects** are expected.

Monitoring

- 1.98 The SEA Regulations require the SA Report to include suggested measures to monitor the significant effects of the NDP.
- 1.99 However, no cumulative significant negative or uncertain effects have been identified therefore no monitoring is required.

Next Steps

- 1.100 The SA report and this accompanying Non-Technical Summary will be available for consultation alongside the Neighbourhood Plan, in spring 2019.

LUC

March 2019



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Hailsham Neighbourhood Plan

Sustainability Appraisal Report (incorporating Strategic Environmental Assessment)

SA Report
Prepared by LUC
March 2019

Project Title: Hailsham Neighbourhood Plan Sustainability Appraisal

Client: Hailsham Town Council

Version	Date	Version Details	Prepared by	Checked by	Approved by
1.0	07/12/18	Draft for client comment	Olivia Dunham Calum McCulloch	Sarah Smith	Philip Smith
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1 Introduction

- 1.1 This Sustainability Appraisal Report has been prepared by LUC on behalf of Hailsham Town Council as part of the integrated Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of the emerging Hailsham Neighbourhood Plan 2016-2036 (NDP, the Plan). This document relates to the Submission Version of the Hailsham Neighbourhood Plan (April 2018) and should be read in conjunction with that document.
- 1.2 While development has been allocated to Hailsham through the emerging Wealden Local Plan, this SA considers the effects likely to arise from the Neighbourhood Plan itself.

Context for the Hailsham Neighbourhood Plan

- 1.3 The Hailsham Neighbourhood Plan covers the market town and parish of Hailsham, in Wealden District, East Sussex. The town is the largest of the five main towns within Wealden, with a population of approximately 24,600¹.
- 1.4 The town is located approximately 5 km north of Polegate and 15 km north of Eastbourne, which is the nearest large town. These towns were previously connected to each other by rail, though the route through Hailsham was removed in 1968 as a result of the Beeching cuts. Main road connections to and from the town comprise the A22 and A27, which connect to Polegate and Eastbourne to the south and Crawley, Horsham and Brighton to the west.
- 1.5 The town sits amongst the lowland forests and marshes of the Sussex Weald and is a gateway to the South Downs National Park. Close to the town is the Pevensey Levels: a low-lying wetland of national and international conservation importance. It is designated as a Site of Special Scientific Interest, a National Nature Reserve, a Ramsar Site, and Special Area of Conservation. It comprises an extensive drainage network and is vulnerable to the effects of climate change and eutrophication.
- 1.6 The town has experienced significant expansion since 1945 and while the town centre, which includes 29 listed buildings, provides the focus for the social and commercial uses, there are large areas of mostly residential development within the town.
- 1.7 A key sustainable travel link is provided by the Cuckoo Trail. This 14 mile long trail along the former railway line links Heathfield to Eastbourne Park, running north to south through Hailsham. Further context and background information about the Hailsham area is set out in **Chapter 3** and **Appendix 3** of this report.

The Neighbourhood Plan

- 1.8 The Hailsham Neighbourhood Plan is being prepared to set out the local community's aspirations for Hailsham over the period to 2028 in relation to land use and development. Its policies will influence future planning applications and decisions in the area.
- 1.9 The Plan will not allocate specific areas for development; this will be undertaken by Wealden District Council (WDC) through the Wealden Local Plan. Instead, the Neighbourhood Plan seeks to manage new development to ensure a higher quality of development in the town than has been achieved in the past.
- 1.10 The Plan will focus on better design of built development form, reducing the reliance on the private car, enhancing sustainable transport links, improving the town centre and helping to

¹ 2014 ONS mid-year estimates

mitigate impacts of new development on the natural and historic environment. The Plan will also set out the Town Council's ambitions in relation to Community Infrastructure Levy (CIL) funding.

- 1.11 A draft version of the Plan was subject to a formal eight-week consultation period (Regulation 14), which ran from 25th November 2017 and 26th January 2018. Comments and responses received through that process, from residents, businesses, statutory consultees and others, were reviewed and informed the Submission version of the Plan (April 2018), to which this SA relates.
- 1.12 The Submission version of the Plan was adopted by the Town Council in April 2018, but has not yet been made as part of Wealden's statutory development plan. This was primarily due to a change in case law regarding Habitats Regulations Assessment (HRA), which prompted a revised screening of the Hailsham Neighbourhood Plan in terms of both HRA and SA.

Sustainability Appraisal (incorporating Strategic Environmental Assessment)

- 1.13 SA is designed to ensure that the plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process involves appraising the likely social, environmental and economic effects of the policies and proposals within a plan from the outset of its development.
- 1.14 The National Planning Policy Framework (NPPF) states that:
'Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. 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).'
- 1.15 SEA is also a statutory assessment process, required under the SEA Directive², transposed in the UK by the SEA Regulations (Statutory Instrument 2004, No 1633). The SEA Regulations require the formal assessment of plans and programmes which are likely to have significant effects on the environment and which set the framework for future consent of projects requiring Environmental Impact Assessment (EIA)³. The purpose of SEA, as defined in Article 1 of the SEA Directive is *'to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans...with a view to promoting sustainable development'*.
- 1.16 SEA and SA are separate processes but have similar aims and objectives. Simply put, SEA focuses on the likely environmental effects of a plan whilst SA includes a wider range of considerations, extending to social and economic impacts. National Planning Practice Guidance⁴ shows how it is possible to satisfy both requirements by undertaking a joint SA/SEA process, and to present an SA report that incorporates the requirements of the SEA Regulations.
- 1.17 In accordance with the instructions of Hailsham Town Council and taking account of the NPPF and positive screening opinion issued by Wealden District Council, the SA/SEA of the Hailsham Neighbourhood Plan is to be undertaken using the joint approach set out above. Throughout this report the abbreviation 'SA' should therefore be taken to refer to 'Sustainability Appraisal incorporating the requirements of Strategic Environmental Assessment'.

Structure of this report

- 1.18 This report is the SA report for the April 2018 Submission Version of the Hailsham Neighbourhood Plan. **Table 1.1** signposts how the requirements of the SEA Regulations have been met within this SA report.

² SEA Directive 2001/42/EC

³ Under EU Directives 85/337/EEC and 97/11/EC concerning EIA.

⁴ <http://planningguidance.planningportal.gov.uk/>

Table 1.1 Requirements of the SEA Regulations and where these have been addressed in this SA Report

SEA Regulations Requirements	Where covered in this SEA report
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is (Part 3 and Schedule 2 of the SEA Regulations):	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes	Chapter 1 and 3 and Appendix 2.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Chapter 3 and Appendix 3.
c) The environmental characteristics of areas likely to be significantly affected	Chapter 3 and Appendix 3.
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	Chapter 3 and Appendix 3.
e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation	Chapter 3 and Appendix 2.
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors ⁵ .	Chapter 5.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Chapter 6.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapter 2 and Appendix 4.
i) a description of measures envisaged concerning monitoring in accordance with Reg. 17;	Chapter 6.
j) a non-technical summary of the information provided under the above headings	A separate Non-Technical Summary document has been prepared to accompany this full SA report.

⁵ These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects

SEA Regulations Requirements	Where covered in this SEA report
<p>The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Reg. 12(3))</p>	<p>Addressed throughout this SA report.</p>
<p>Consultation:</p> <ul style="list-style-type: none"> authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Reg. 12(5)) 	<p>The SA Scoping Report was subject to consultation with the statutory consultees from 7th November 2018 until 13th December 2018.</p>
<ul style="list-style-type: none"> authorities with environmental responsibility and the public, shall be given an effective opportunity to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Reg. 13(3), 13(4)) 	<p>This SA Report will be published for consultation alongside the Submission version of the NDP in spring 2019.</p>
<ul style="list-style-type: none"> other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Reg. 14). 	<p>N/A</p>
<p>Taking the environmental report and the results of the consultations into account in decision-making (Reg. 16)</p>	
<p>Provision of information on the decision: When the plan or programme is adopted, the public and any countries consulted under Reg.s 13 and 14 must be informed and the following made available to those so informed:</p> <ul style="list-style-type: none"> the plan or programme as adopted a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report of Reg. 12, the opinions expressed pursuant to Reg. 13(2)(d) and the results of consultations entered into pursuant to Reg. 14(4) have been taken into account, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and the measures decided concerning monitoring (Reg. 16(4)(f)) 	<p>To be addressed after the NDP is adopted.</p>
<p>Monitoring of the significant environmental effects of the plan's or programme's implementation (Reg. 17)</p>	<p>To be addressed after the NDP is adopted.</p>
<p>Quality assurance: environmental reports should be of a sufficient standard to meet the requirements of the SEA Regulations.</p>	<p>This report has been produced in line with current guidance and good practice for SA/SEA and this table demonstrates where the requirements of the SEA Regulations have been met.</p>

- 1.19 This section has introduced the SA of the Hailsham Neighbourhood Plan. The remainder of the report is structured into the following sections:
- **Chapter 2: Methodology** describes the approach used for the specific SA tasks, including how the objectives have been applied to the NDP.
 - **Chapter 3: Sustainability context for development in Hailsham** summarises the relationship between the Hailsham Neighbourhood Plan and other relevant plans, policies and programmes, summarises environmental characteristics of the plan area and identifies the key environmental issues facing Hailsham.
 - **Chapter 4: SA findings for reasonable alternatives for the Neighbourhood Plan** sets out the SA findings for the reasonable alternatives that have been considered in preparation of the plan.
 - **Chapter 5: SA findings for the Neighbourhood Plan** sets out the SA findings for the assessment of the plan.
 - **Chapter 6: Monitoring** describes the approach that should be taken to monitoring the likely significant effects of the NDP (both positive and negative) and proposes monitoring indicators.
 - **Chapter 7: Conclusions** summarises the key findings from the SA and describes the next steps to be undertaken in the NDP preparation process.
- 1.20 The main body of the report is supported by a number of appendices:
- **Appendix 1** presents the consultation comments that were received in relation to the SA Scoping Report (November 2018) and describes how those comments have been addressed.
 - **Appendix 2** presents the review of relevant plans, policies and programmes.
 - **Appendix 3** contains the baseline environmental information for Hailsham.
 - **Appendix 4** presents the justification for selecting specific policies.

2 Methodology

- 2.1 In addition to complying with legal requirements, the approach being taken to the SA of the Hailsham Neighbourhood Plan is based on current best practice and the guidance on SA/SEA set out in the National Planning Practice Guidance⁶, which involves carrying out SA as an integral part of the plan-making process. **Table 2.1** below sets out the main stages of the plan-making process and shows how these correspond to the SA process.

Table 2.1: Corresponding stages in plan making and SA

Step 1: Evidence Gathering and engagement
SA stages and tasks
<p>Stage A: Screening</p> <ul style="list-style-type: none"> • 1: Determine whether the neighbourhood plan is likely to have significant environmental effects. • 2: Consult the environmental assessment consultation bodies.
<p>Stage B: Setting the context and objectives, establishing the baseline and deciding on the scope</p> <ul style="list-style-type: none"> • 1: Identify other relevant policies, plans and programmes, and sustainability objectives • 2: Collect baseline information • 3: Identify sustainability issues and problems • 4: Develop the SA Framework • 5: Consult on the scope of the SA
Step 2: Production
SA stages and tasks
<p>Stage C: Developing and refining options and assessing effects</p> <ul style="list-style-type: none"> • 1: Test the plan objectives against the SA Framework • 2: Develop the plan options • 3: Evaluate the effects of the plan • 4: Consider ways of mitigating adverse effects and maximising beneficial effects • 5: Propose measures to monitor the significant effects of implementing the plan
<p>Stage D: Prepare the Sustainability Appraisal Report</p> <ul style="list-style-type: none"> • 1: Prepare the SA Report
<p>Stage E: Publish and consult the consultation bodies and the public on the Sustainability Appraisal Report</p> <ul style="list-style-type: none"> • 1: Public participation on plan and the SA Report

⁶ <http://planningguidance.communities.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/>

- 2: Appraising significant changes

Steps 3 & 4: Making and Monitoring

SA stages and tasks

Stage F: Post making reporting and monitoring

- 1: Prepare and publish post-adoption statement
- 2: Monitor significant effects of implementing the neighbourhood plan
- 3: Respond to adverse effects

- 2.2 The methodology set out below describes the approach that has been taken to the SA of the Hailsham Neighbourhood Plan to date and provides information on the subsequent stages of the process.

Stage A: Screening

- 2.3 The SEA Screening Opinion (October 2018) screened the NDP into the SEA/SA process on the basis that it may result in likely significant environmental effects. This is primarily because the Neighbourhood Plan area contains and is in close proximity to internationally designated biodiversity sites. Other potential significant effects identified at the screening stage relate primarily to cultural heritage assets, the hydrological regime and water quality and other features of the natural environment.

Stage B: Scoping

- 2.4 Preparation of the SA began in November 2018 with the production of a Scoping Report for the Hailsham Neighbourhood Plan, which was prepared by LUC on behalf of Hailsham Town Council. The scoping stage of the SA involves understanding the social, economic and environmental baseline for the plan area as well as the sustainability policy context and key sustainability issues. The Scoping Report presented the outputs of the following tasks:
- Policies, plans and programmes of relevance to the Neighbourhood Plan were identified and the relationships between them were considered, enabling any potential synergies to be exploited and any potential inconsistencies and incompatibilities to be identified and addressed.
 - In line with the requirements of the SEA Regulations, baseline information was collected on the following 'SEA topics': biodiversity, flora and fauna; population and human health; water; soil; air; climatic factors; material assets; cultural heritage and the landscape. Data on social and economic issues were also taken in to consideration. This baseline information provides the basis for predicting and monitoring the likely effects of the Neighbourhood Plan and helps to identify alternative ways of dealing with any adverse effects identified.
 - Drawing on the review of relevant plans, policies and programmes and the baseline information, key sustainability issues for the district were identified (including environmental problems, as required by the SEA Regulations).
 - A Sustainability Appraisal framework was then presented, setting out the SA objectives against which options and subsequently policies will be appraised. The SA framework provides a way in which the sustainability impacts of implementing a particular plan can be described, analysed and compared. The SA framework is designed to set out a series of sustainability objectives and associated questions that can be used to "interrogate" options and policies drafted during the plan-making process. These SA objectives define the long-term aspirations for Hailsham with regard to social, economic and environmental

considerations. During the SA, the performance of the plan options (and later, policies) are assessed against these SA objectives and appraisal questions.

- 2.5 The review of relevant plans, policies and programmes and the baseline information are presented in **Appendix 2** and **Appendix 3** respectively.
- 2.6 Public and stakeholder participation is an important element of the SA and wider plan-making processes. It helps to ensure that the SA report is robust and has due regard for all appropriate information that will support the NDP in making a contribution to sustainable development. The SA Scoping Report for the Hailsham Neighbourhood Plan was published in November 2018 for a five week consultation period with the statutory consultees (Natural England, the Environment Agency and Historic England). The comments received during the consultation were then reviewed and addressed as appropriate in this SA. **Appendix 1** of this report lists the comments that were received during the scoping consultation and consultation on the SA to accompany the draft NDP and describes how each one was addressed.
- 2.7 **Table 2.2** below presents the 11 SA objectives in the Hailsham SA framework and shows how the 'SEA topics' (listed in Schedule 2 of the SEA Regulations) that were scoped in to the assessment have been covered by these. Only those issues that have been scoped in to the SA have been included in the below table. The only topic scoped out of the SA is 'soils', as it is not expected that the policies contained within the NDP will have any significant effects on soil quality in Hailsham. This is because the NDP will not propose specific sites for new development; rather its aim will be to limit the impact of additional servicing and delivery for new developments. The statutory consultation bodies did not raise any issues with the scoping out of this topic.

Table 2.2 SA framework for Hailsham Neighbourhood Plan

SA Objectives	Guidance Questions – will the Plan...?	SA Regulations Topic(s) covered
1 Protect and enhance biodiversity and geodiversity within the Parish.	<ul style="list-style-type: none"> • Protect, conserve and enhance the geodiversity and biodiversity of sites, including habitats that support it, of International, European, national and local importance? • Conserve and enhance habitats and species within the parish, particularly where these are rare, declining, threatened or indigenous? • Avoid where possible, and otherwise minimise, adverse impacts on species and habitats through human activities and development? 	Biodiversity Flora Fauna
2 Conserve and enhance the Parish’s landscape and townscape.	<ul style="list-style-type: none"> • Avoid and minimise negative impacts of future development on the landscape and townscape? • Protect local landscape and townscape quality, distinctiveness and character from unsympathetic development and changes in land management? • Protect local landscape quality, distinctiveness and character from poor access management? 	Landscape
3 Conserve and enhance the Parish’s historic environment and cultural assets.	<ul style="list-style-type: none"> • Maintain the character, setting and appearance of historic assets in the Parish, particularly designated assets? • Maintain and promote access to historic and cultural assets for all, where appropriate? 	Cultural heritage
4 To maintain and improve the water quality of the Parish’s waterbodies and groundwater, and to achieve sustainable water resources management.	<ul style="list-style-type: none"> • Maintain and, where possible, improve the quality and quantity of all water resources? • Incorporate sustainable urban drainage systems (SUDs) and green infrastructure practices into new development? • Ensure that new developments do not lead to a reduction in the quality of ground water, surface water or river water • Lead to the effective management of demand for 	Water Climatic factors

SA Objectives	Guidance Questions – will the Plan...?	SA Regulations Topic(s) covered
	water, prevent stress on the natural environment and help water users adapt to the impacts of climate change?	
5 Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.	<ul style="list-style-type: none"> • Guide inappropriate development away from flood risk areas? • Ensure that where development in flood risk areas is permitted, the risks to people and property are mitigated? • Promote flood resilience and resistance measures in development, including incorporating sustainable urban drainage systems (SUDs) and green infrastructure practices into new development? 	Water Climatic factors
6 Reduce air pollution and minimise traffic, particularly in Hailsham town centre.	<ul style="list-style-type: none"> • Ensure that local air quality is not adversely affected pollution and seek to improve it where necessary? • Limit or reduce the emission of air pollutants? • Promote inclusion of sustainable transport links within the District and reducing the need to travel? 	Air Human Health
7 Minimise greenhouse gas emissions in the Parish.	<ul style="list-style-type: none"> • Limit or reduce the emission of greenhouse gases? • Encourage and promote the use of clean, low carbon energy efficient technologies? • Maximise the use of energy from renewable resources? • Encourage energy-efficient design? • Promote inclusion of sustainable transport links within the District? • Locate development close to existing services and facilities to ease access? 	Climatic Factors Air
8 Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home.	<ul style="list-style-type: none"> • Ensure provision of sufficient levels of affordable housing? • Provide a sufficient mix of housing types and 	Population Material Assets

SA Objectives	Guidance Questions – will the Plan...?	SA Regulations Topic(s) covered
	<p>tenures to meet current and future needs of the Parish?</p> <ul style="list-style-type: none"> • Ensure new housing is good quality, resource efficient and with a reduced environmental impact? 	
<p>9 Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness.</p>	<ul style="list-style-type: none"> • Deliver education and training which helps everyone develop the values, knowledge and skills necessary to enable them to live, act and work in a sustainable society? • Recognise the need for people to adapt to economic change and retrain where necessary? • Encourage provision of new education facilities and services to support the learning and professional development of the local population? • Enhance access to existing education facilities? 	<p>Population Material Assets</p>
<p>10 Facilitate improved health and wellbeing of the population including reducing inequalities in health.</p>	<ul style="list-style-type: none"> • Ensure all members of society have access to the health care that they require? • Reduce health inequalities within society associated with income, lifestyle and diet? • Improve road safety and advocate sustainable modes of transport? • Help create a healthy and safe working and living environment with low rates of crime and disorder? • Help improve quality of life for all? • Anticipate and plan for the potential impacts of climate change on health? • Minimise noise and light pollution? 	<p>Human Health</p>
<p>11 Facilitate a sustainable and growing economy that enhances access to employment and business opportunities.</p>	<ul style="list-style-type: none"> • Increase the number, variety and quality of employment opportunities including those offered by tourism and social enterprise? • Increase access for all to a range of jobs through improved training, sustainable transport and 	<p>Population Material Assets</p>

SA Objectives	Guidance Questions – will the Plan...?	SA Regulations Topic(s) covered
	<p>communication links?</p> <ul style="list-style-type: none"> • Increase and widen future employment opportunities? 	

SA Stage C: Developing and refining options and assessing effects

- 2.8 Developing options for a plan is an iterative process, usually involving a number of consultations with public and stakeholders. Consultation responses and the SA can help to identify where there may be other 'reasonable alternatives' to the options being considered for a plan.
- 2.9 Regulation 12 (2) of the SEA Regulations requires that:
"The (environmental or SA) report must identify, describe and evaluate the likely significant effects on the environment of—
(a) implementing the plan or programme; and
(b) reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme."
- 2.10 It should be noted that any alternatives considered for the plan need to be "reasonable". This implies that alternatives that are not reasonable do not need to be subject to appraisal. Examples of unreasonable alternatives could include policy options that do not meet the overarching Vision and Objectives of the plan or national policy (e.g. the National Planning Policy Framework) or site options that are unavailable or undeliverable.
- 2.11 It also needs to be recognised that the SEA and SA findings are not the only factors taken into account when determining a preferred option to take forward in a plan. Indeed, there will often be an equal number of positive or negative effects identified for each option, such that it is not possible to 'rank' them based on sustainability performance in order to select a preferred option. Factors such as public opinion, deliverability and conformity with national policy will also be taken into account by plan-makers when selecting preferred options for their plan.

Identification and appraisal of options for the Hailsham Neighbourhood Plan

- 2.12 The options for the NDP were identified through engagement and consultation with the local community. This started with an initial consultation with local people, to identify issues, concerns and areas of focus for the NDP. The Town Council also collected a range of evidence to inform the plan, including a town centre analysis⁷, town wide analysis⁸ and character assessment⁹. Appendix 4 of this report presents the justification for selecting the submission version policies over the draft emerging policies.

SA Stage D: Preparing the Sustainability Appraisal report

- 2.13 This SA report describes the process that has been undertaken to date in carrying out the SA of the Hailsham Neighbourhood Plan. It sets out the findings of the appraisal of options and measures set out in the NDP, highlighting any likely significant effects (both positive and negative, and taking into account the likely secondary, cumulative, synergistic, short, medium and long-term and permanent and temporary effects as relevant).

SA Stage E: Consultation on the Hailsham Neighbourhood Plan and this SA Report

- 2.14 Hailsham Town Council is inviting comments on the NDP and this SA Report. Both will be published on the Town Council's website in spring 2019.

⁷ Troy Planning (2017) Hailsham Neighbourhood Plan, Town Centre Analysis

⁸ Troy Planning (2017) Hailsham Neighbourhood Plan, Town Wide Analysis

⁹ Troy Planning (2017) Hailsham Character Assessment

SA Stage F: Monitoring implementation of the Neighbourhood Plan

- 2.15 Recommendations for monitoring the social, environmental and economic effects of implementing the Hailsham Neighbourhood Plan are presented in **Chapter 6**.

Appraisal methodology

- 2.16 The policies set out in the Neighbourhood Plan and their reasonable alternatives have been appraised against 11 SA objectives in the SA framework (see **Table 2.2** earlier in this section), with scores being attributed to each option or preferred approach to indicate its likely sustainability effects on each objective as follows.
- 2.17 The likely effects of the options for the Neighbourhood Plan need to be determined and their significance assessed, and this inevitably requires a series of judgments to be made. This appraisal has attempted to differentiate between the most significant effects and other more minor effects through the use of the symbols shown in **Table 2.3**.

Table 2.3 Key to symbols and colour coding used in the SA of the Hailsham Neighbourhood Plan

++	The option is likely to have a significant positive effect on the SA objective(s).
+	The option is likely to have a positive effect on the SA objective(s).
0	The option is likely to have a negligible or no effect on the SA objective(s).
-	The option is likely to have a negative effect on the SA objective(s).
--	The option is likely to have a significant negative effect on the SA objective(s).
?	It is uncertain what effect the option will have on the SA objective(s), due to a lack of information.
+/-	The option is likely to have a mixture of positive and negative effects on the SA objective(s).

- 2.18 Where a potential positive or negative effect is subject to uncertainty, for example because the outcome will be reliant on events or actions by third parties, a question mark has been added to the relevant score (e.g. +? or -?) and the score is colour coded as per the potential positive, negligible or negative score (i.e. green, red etc.).
- 2.19 The likely effects of the options need to be determined and their significance assessed, which inevitably requires a series of judgments to be made. This appraisal has attempted to differentiate between the most significant effects and other more minor effects and record these through the use of the symbols shown above. The dividing line in making a decision about the significance of an effect is often quite small. Where either '++' or '--' has been used to distinguish significant effects from more minor effects (+ or -) this is because the effect of an option on the SEA objective in question is considered to be of such magnitude that it will have a noticeable and measurable effect taking into account other factors that may influence the achievement of that objective. However, scores are relative to the scale of proposals under consideration.

Difficulties encountered

- 2.20 It is a requirement of the SEA Regulations that consideration is given to any data limitations or other difficulties that are encountered during the SA process and these are outlined below.

- 2.21 WDC carried out HRA of the Submission NDP. This relates to the submission version policies and has been used to inform the SA, but there was not an equivalent for the draft emerging policies.
- 2.22 Each policy has been assessed individually in **Chapter 5**, and therefore, when assessing the draft emerging policies against SA objective 1, potential likely significant effects identified in the HRA screening were taken into account, where similar impacts were considered likely to arise. The Cumulative Effects section of **Chapter 5** considers the likely effects of the NDP as a whole, and therefore incorporates the findings of the Appropriate Assessment, which assessed whether the likely significant effects identified at the screening stage would result in adverse effects on integrity of any European sites. The Appropriate Assessment is relevant to in-combination effects as it concludes that there will be no adverse effects on integrity of European sites as a result of safeguarding policies contained within the NDP and the emerging Wealden Local Plan. As such, adverse effects on European sites are only avoided when the plan is considered as a whole and in-combination with the Wealden Local Plan.

3 Sustainability context for development in Hailsham

Review of plans, policies and programmes

3.1 The Hailsham Neighbourhood Plan is not prepared in isolation, being greatly influenced by other plans, policies and programmes and by broader sustainability objectives. It needs to be consistent with international and national guidance and strategic planning policies and should contribute to the goals of a wide range of other programmes and strategies. It must also conform to environmental protection legislation and the sustainability objectives established at an international, national and regional level.

3.2 A review has been undertaken of the other plans, policies and programmes that are relevant to the Neighbourhood Plan (**Appendix 2**).

Schedule 2 of the SEA Regulations requires:

(1) 'an outline of the...relationship with other relevant plans or programmes'; and

(5) 'the environmental protection objectives established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation'

3.3 It is necessary to identify the relationships between the Hailsham Neighbourhood Plan and other relevant plans, policies and programmes so that any potential links can be built upon and any inconsistencies or potential conflicts addressed.

Key international plans, policies and programmes

3.4 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 the emerging Hailsham Neighbourhood Plan. These processes should be undertaken iteratively and integrated into the production of the plan in order to ensure that any potential negative environmental effects (including on European-level nature conservation designations) are identified and can be mitigated.

3.5 There is a wide range of other EU Directives relating to issues such as water quality, waste and air quality, which have been transposed into UK law, however the international directives have been included in **Appendix 2** for completeness.

Key national plans, policies and programmes

3.6 The Localism Act (2011) sought to move decision-making away from central government and towards local communities. Part of this included the introduction of Neighbourhood Planning.

3.7 Another significant development in terms of the policy context for the Neighbourhood Plan has been the publication of the National Planning Policy Framework (NPPF) which replaced the suite of Planning Policy Statements (PPSs) and Planning Policy Guidance (PPGs). The purpose of the NPPF was to streamline national planning policy. The Neighbourhood Plan must be consistent with the requirements of the NPPF. The NPPF sets out information about the purposes of Neighbourhood Plan-making, stating that:

'Neighbourhood planning gives communities the power to develop a shared vision for their area.'

- 3.8 The NPPF also states that Neighbourhood Plans '*can shape, direct and help to deliver sustainable development*'. This means that opportunities should be identified in order to achieve net gains in terms of sustainable social, environmental and economic development; however significant adverse impacts in any of those areas should not be allowed to occur.
- 3.9 The NPPF requires local planning authorities and communities to set out non-strategic priorities for the area in the Neighbourhood Plan. This could include policies to deliver:
- Site allocations for small and medium-sized housing.
 - The provision of infrastructure and community facilities at a local level.
 - Establishing design principles.
 - Conservation and enhancement of the natural and historic environment.

Baseline Information

- 3.10 Information about past trends and the current state of the environment provides a baseline against which to assess the likely sustainability effects of the Neighbourhood Plan and monitoring its outcomes.
- 3.11 Schedule 2 of the SEA Regulations requires data to be gathered on biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the inter-relationship between the above factors. In regard to soil, the effects of the plan on soils have been scoped out of the SA as it is not expected that the measures contained within the Neighbourhood Plan will have any significant effects on soil quality in Hailsham. This is because the Neighbourhood Plan does not allocate sites for development. As an integrated SA and SEA is being carried out, baseline information relating to other 'sustainability' topics has also been included; for example information about housing and economic growth. Baseline information was originally presented in the SA Scoping Report and is presented in **Appendix 3**.

Key sustainability issues and their evolution without the Neighbourhood Plan

- 3.12 An up-to-date set of key sustainability issues for Hailsham was identified during the scoping stage of the SA and were presented in the Scoping Report. These were identified through the review of relevant plans and policies and the review of baseline information, which has been reproduced in **Appendix 2** and **Appendix 3**.
- 3.13 In recognition of the SEA Regulation requirement (Schedule 2) that the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme must be described in the Environmental Report, **Table 3.1** shows the likely evolution of the key sustainability issues if the Hailsham Neighbourhood Plan were not to be implemented.

Table 3.1 Key Sustainability Issues for the Hailsham Neighbourhood Plan

Key issues	Likely evolution without the Neighbourhood Plan
Population	
<p>Hailsham contains areas with significant levels of deprivation, particularly with regards to income and employment, barriers to housing and services and education, skills and training.</p> <p>There are areas comparatively higher levels of crime, notably in the west of the Hailsham urban area.</p> <p>Hailsham has an ageing population.</p>	<p>Without the Neighbourhood Plan, population trends are likely to continue, including a rise in average age and associated age-related medical conditions, in line with the national trend of an ageing population. However, the Plan provides an opportunity to ensure development caters to the needs of an older population, which may otherwise be overlooked.</p> <p>Levels of deprivation and crime are not expected to change significantly without the Plan in place, although the emerging Wealden Local Plan contains policies that could address these issues to some extent. The Plan could further encourage measures to reduce crime and deprivation.</p>
Housing	
<p>A significant amount of housing is needed within Wealden with around 2,672 of these homes allocated to Hailsham in the emerging Wealden Local Plan to 2028.</p> <p>Market housing is unaffordable for many residents in Wealden. As such, a suitable proportion newly built housing must be made affordable.</p> <p>High quality housing in a mix of types and styles is required to enhance local character and to meet Hailsham’s demographic needs, such as an ageing population.</p>	<p>Without the Neighbourhood Plan, delivery of the required number of houses (including affordable homes) with a mix of housing types will, to a large extent, be delivered through policies within the Wealden District Local Plan. The Plan could help to ensure housing is of a sufficient type and quality to meet local needs.</p>
Health	
<p>There are incidences of a number of health conditions within Hailsham, including chronic obstructive pulmonary disease, adult and childhood obesity, cancer, diabetes and dementia.</p> <p>Hailsham has an ageing population, which has specific needs to maintain and promote health.</p> <p>There are health discrepancies between more and less deprived areas of Hailsham.</p> <p>New housing development will create an additional need for open space, sports and recreational facilities.</p> <p>Accessibility of open spaces varies within the Plan area.</p> <p>The network of pedestrian routes is incomplete.</p>	<p>The emerging Wealden Local Plan includes policies that promote improved health and wellbeing across the district. However the Plan has the opportunity to provide more detailed policies that help to improve the health outcomes for its residents. This includes policies relating to transport, open space, community facilities, design, and the town centre.</p> <p>Specific policies for new or improved open space, sport and recreation provision with planned development are provided in some site allocation policies in the Wealden Local Plan. However, the Plan can provide more detailed policy to inform the design of open spaces provided within new developments. The Plan can also set out site-specific GI and open space proposals for open spaces outside major developments as these are not set out in the Local Plan.</p>
Education	

<p>Hailsham has a lower than average level of educational attainment than Wealden as a whole.</p> <p>Hailsham has a shortfall in primary school places available.</p> <p>Additional capacity within secondary schools is likely to be required after 2022.</p> <p>Lack of public transport may act as a barrier to accessing educational opportunities.</p>	<p>The Local Education Authority is responsible for securing the required number of school places, although the Wealden Local Plan can help to identify sites for new educational facilities and requirements for developers to contribute towards these. The Plan vision aims to provide new and improved educational opportunities through growth and could help to increase access to these.</p>
Economy	
<p>The percentage of the parish population that is economically active is lower than regional and national averages.</p>	<p>Despite rising workforce projection figures for the Wealden district between 2018 and 2031, the Wealden Economy Study¹⁰ suggests that the existing stock of employment premises are of sub-optimal quality and will need future investment. The Plan presents an opportunity to address these issues by ensuring new office and other employment premises are of sufficient quality. It is also possible that the percentage of the workforce that is economically active will decline, due to the national trend of an ageing population. This is not a factor that the Plan can influence.</p>
Air quality, noise and traffic	
<p>There are safety concerns and conflicts between different types of traffic in Hailsham Town Centre.</p> <p>The pedestrian network is incomplete.</p> <p>There are concerns regarding high levels of noise generated by road traffic within Hailsham Town Centre.</p>	<p>Policies within the emerging Wealden Local Plan will prevent, to a large extent, the adverse effects of noise, air quality, and traffic from new development. However, without the Plan, site-specific issues could be overlooked. The Plan may also contain detailed policies that help to mitigate adverse impacts of air quality, noise and traffic such as policies relating to transport, housing design and green infrastructure.</p>
Biodiversity and geodiversity	
<p>There are a number of sensitive habitats and designated sites within and within proximity of the parish.</p> <p>The Pevensey Levels are subject to a number of threats.</p>	<p>Adverse impacts to the Pevensey Levels could increase due to population growth, development and recreational pressures. However, the Plan has the opportunity to ensure that measures are put in place to ensure that development does not have a significant adverse impact on the Pevensey Levels. Globally, there has been a decline in biodiversity in recent years. In the UK specifically, over 40% of priority habitats and 30% of priority species were declining in the most recent analysis.¹¹</p>
Climate change mitigation	
<p>The population of Wealden consumes greater amounts of electricity than national average levels.</p> <p>There is poor access to train services via public transport, leading to reliance on private vehicle transport.</p>	<p>It is likely that the impacts of climate change will continue to affect those living in Hailsham and all other areas of the UK. Given that the impacts of this issue are expected to worsen and intensify, it is likely that there will be added strains on existing infrastructure within Hailsham. Without the implementation of the Plan, mitigation measures such as electric cars may not be as readily available or accessible for use within the community.</p>

¹⁰ Regeneris Consulting for Wealden District Council, Wealden Economy Study, December 2016

¹¹ Biodiversity 2020: A strategy for England's wildlife and ecosystem services, 2011

Climate Change adaptation	
<p>There are existing and future flood risk issues, such as those associated with the Splent Crescent, Upper Horsebridge Road and Diplocks Way.</p> <p>Current amounts of green infrastructure within Hailsham may not be sufficient enough to address future climate change effects within Hailsham.</p>	<p>As climate change effects are likely to be continually felt in Hailsham and in other parts of the UK, increasingly, there will be a need for local services and infrastructure to adapt and meet the needs of future populations. The Plan could help to ensure that buildings and associated infrastructure will be constructed to incorporate climate change resilience.</p>
Landscape	
<p>Large industrial and commercial buildings in the south of the town, a sewage works to the south east of the town and a Chalet Park also at the eastern edge of the town are considered to have an adverse effect on the landscape.</p> <p>New development could adversely affect landscape if not designed carefully.</p>	<p>Hailsham's landscape would largely be protected by policies within the Wealden District Local Plan. However, the Plan provides an opportunity to provide more detailed policy in relation to design and local distinctiveness, thereby helping to conserve and enhance the landscape.</p>
Historic Environment	
<p>Potential conflicts between the protection of heritage assets and mitigating the impact of climate change. For example, where homeowners wish to install renewable energy features, such as solar PV arrays on roofs in a conservation area or on a listed building, this may adversely affect the heritage significance of the building or surrounding area.</p> <p>Adaptation to climate change and flood risk mitigation measures should have regard to the character of the historic environment.</p> <p>Loss of appropriate training/skills and materials to maintain the character and distinctiveness.</p> <p>Potential lack of access to and understanding of the historic environment.</p>	<p>There will be no change to the baseline in the absence of the Plan, due to protection of designated features through national policy and also through policies in the Wealden Local Plan that promote conservation of the historic environment. However, the Plan has the opportunity to ensure that any new development is undertaken with the aim of conserving and enhancing the historic environment.</p>
Water quality and water resources	
<p>New development could adversely affect water quality, particularly of the sensitive Pevensey Levels, due to increased surface water runoff, increased water abstraction and increased effluent discharge at wastewater sewage works.</p> <p>New development could increase pressure on water resources due to increased water-abstraction.</p> <p>Climate change could put pressure on water resources and could adversely affect water quality because of increased occurrences of drought and extreme rain.</p>	<p>Adverse effects on water quality and water resources are likely to be mitigated to a large extent by policies within the Wealden District Local Plan and by the Environment Agency's licensing regimes for water abstraction and discharges. However, the Plan provides an opportunity to ensure development adopts sustainable design and construction techniques that could help to mitigate adverse effects on water supply and quality, e.g. sustainable drainage systems (SUDS), provision of green infrastructure, or grey water recycling.</p>

4 SA findings for the reasonable alternatives to the Neighbourhood Plan

- 4.1 This section describes the SA findings for the draft policies presented in the Draft Emerging Neighbourhood Plan (April 2017). These were initial policy approaches, and are considered to be the reasonable alternatives to the policies in the Submission Version Neighbourhood Plan (April 2018). The draft vision options and draft objectives were presented at community consultation events. The draft vision options and objectives can be found in the Consultation Statement¹².

Draft Vision Option 1

- 4.2 Draft Vision Option 1 sets out a general aspiration for Hailsham's growth and development to foster a high quality of life. Significant positive effects (++) are expected in relation to SA objectives 1, 2, 3, 6, 9, 10 and 11 as the vision refers to retaining the town's heritage and individuality, regenerating the town centre through the enhancement of low emission transport technologies and creation of appealing retail and leisure destinations, protecting and managing green space (with special regard for the Pevensy Levels), improving employment prospects and providing excellent medical and schooling facilities. Minor positive effects are expected in relation to SA objective 7, as the vision supports employing low emission transport technologies. The Vision is unlikely to result in significant adverse effects. Most of the effects in the vision are subject to some uncertainty since their details will depend on the detail of the individual NDP policies.

Draft Vision Option 2

- 4.3 The Vision sets out a general aspiration for Hailsham's growth and development to foster a high quality of life. Significant positive effects (++) are expected in relation to SA objectives 3, 6, 10 and 11 as the vision refers to preserving and enhancing its heritage, improving pedestrian and cycling links and improving retail offer supporting a mix of independent and national shops to improve employment prospects. Minor positive effects (+) are expected in relation to SA objectives 1, 2 and 7, as the vision puts an emphasis on enhancing and connecting green space, creating a more sustainable town with a strong sense of identity and supports active travel and the reduction of car based travel. The Vision is unlikely to result in significant adverse effects. Most of the effects in the vision are subject to some uncertainty since their details will depend on the detail of the individual NDP policies.

¹² Hailsham Town Council, Hailsham Neighborhood Plan Submission Version: Consultation Statement (April 2018)

Table 4.1 SA scores for Draft Vision Option 1

SA Objectives	Draft Vision Option 1	Draft Vision Option 2
SA1: Protect and enhance biodiversity and geodiversity within the Parish	++?	+?
SA2: Conserve and enhance the Parish's landscape and townscape.	++?	+?
SA3: Conserve and enhance the Parish's historic environment and cultural assets.	++?	+++
SA4: To maintain and improve the water quality of the Parish's waterbodies and groundwater, and to achieve sustainable water resources management.	0	0
SA5: Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.	0	0
SA6: Reduce air pollution and minimise traffic, particularly in Hailsham town centre.	++?	+++
SA7: Minimise greenhouse gas emissions in the Parish.	+?	+?
SA8: Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home.	0	0
SA9: Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness.	++?	0
SA10: Facilitate improved health and wellbeing of the population including reducing inequalities in health.	++?	+++
SA11: Facilitate a sustainable and growing economy that enhances access to employment and business opportunities.	++?	+++

Draft Objectives of the Neighbourhood Plan

4.4 The draft objectives were as follows:

1. Development delivers the necessary facilities and infrastructure in accessible locations for existing and new communities alike.
2. Existing pedestrian and cycling routes are preserved and enhanced. The Cuckoo Trail will be improved as a multi-functional route for tourism, travel and recreation, further linking Hailsham to its surrounding communities.
3. New developments will create well connected, attractive cycling and pedestrian routes, providing seamless integration with the existing urban areas and public green spaces to encourage a reduction in car based travel.
4. Existing habitats and green infrastructure networks are protected and enhanced through sensitive development to encourage local habitat improvement creation.
5. The character and setting of Hailsham's conservation area, statutory listed buildings and locally listed building are protected by fostering a high quality design approach which promotes design innovation and reinforces the distinct local character areas of Hailsham.
6. Seek to improve local air quality and provide reductions in carbon emissions by supporting local renewable energy generation.
7. Encourage the re-development of previously developed land to help meet housing need and encourage the regeneration of Hailsham Town Centre.
8. Protect and encourage the development of retail and commercial spaces which meet identified local need to support new and existing small businesses and retailers and attract inward investment into Hailsham.
9. Support existing retailers in Hailsham and encourage a diversification of the retail and leisure offers in the town to attract new shoppers and visitors.

Assessment of the Draft Objectives

4.5 The likely sustainability effects of the draft objectives are summarised in **Table 4.2**.

- 4.6 The draft objectives are unlikely to have any significant negative effects. Most of the Objectives are likely to have significant positive, minor positive effects, or negligible effects in relation to the SA objectives. All the objectives are expected to have a significant positive effect against at least one SA objective, where they directly address the SA objectives. No minor negative effects are expected from the draft objectives, with the exception of draft objective 7, which is expected to have mixed minor negative and positive effects with uncertainty in relation to SA objective 1
- 4.7 Objective 1 supports the delivery of accessible facilities and infrastructure. It has been assumed that 'facilities and infrastructure' encompasses a wide range of items, including health and educational facilities and employment space, however the objectives does not specify which facilities and infrastructure. As such, this objective is expected to have significant positive effects with uncertainty in relation to SA objectives 8, 9, 10 and 11.
- 4.8 Significant positive effects with uncertainty are also expected in relation to SA objectives 6 and 7; this is because the objective supports transport infrastructure and reducing the need to travel.
- 4.9 Objective 2 supports the enhancement of pedestrian and cycling routes. Enhancement of pedestrian and cycle routes will help to reduce reliance on private vehicles thereby helping to reduce traffic and associated greenhouse gas emissions and help to create a healthy and safe working and living environment. As such, this objective directly addresses SA objectives 6, 7, and 10
- 4.10 Minor positive effects are expected in relation to SA objectives 9 and 11 because the enhancement of pedestrian and cycling routes could increase access to educational facilities and job opportunities.
- 4.11 Objective 3 supports development that creates well connected walking and cycling routes, so that reliance on car based travel is reduced. Enhancement of pedestrian and cycling routes will help to promote health and wellbeing, improve connectivity to green spaces, reduce reliance on private

vehicles thereby helping to reduce traffic and associated greenhouse gas emissions, increase access to educational and health facilities, job opportunities and help to create a healthy and safe working and living environment. As such, this objective addresses SA objectives 6, 7, and 10.

- 4.12 Minor positive effects are expected in relation to SA objectives 1, 2, 9 and 11 because the enhancement of pedestrian and cycling routes could increase access to educational facilities and job opportunities. Additionally, enhancing connectivity to public green space could enhance the townscape and protect biodiversity.
- 4.13 Objective 4 supports the protection and enhancement of habitats and green infrastructure networks, which directly addresses SA objective 1, for which significant positive effects are expected. Minor positive effects also expected in relation to SA objectives 2, 4, 5, 6 and 10. This is because enhancements to habitats and green infrastructure are likely to have a number of associated benefits including improving the quality of the landscape and water quality, reducing the risk of flooding by reducing surface water runoff, reducing air pollution and helping to create a healthy living and working environment.
- 4.14 Objective 5 supports protecting the character of Hailsham through protecting Hailsham's conservation area and listed buildings, by fostering innovative and high quality design, therefore directly addresses SA objectives 2 and 3 for which significant positive effects are expected. A minor positive effect is expected in relation to SA objective 10 as improvements to the character and setting of Hailsham would help to improve the working and living environment and improve quality of life within the town.
- 4.15 Objective 6 supports improvements to local air quality and reductions in carbon emissions by supporting local renewable energy generation. As such, significant positive effects are expected in relation to SA objectives 6 and 7 which relate to the minimising air pollution and reduction of greenhouse gas emissions. Minor positive effects are also expected in relation to SA objectives 8 and 10 as this objective has the potential to improve air quality which can help to create a healthy work and living environment, as well as promote the integration of renewable technologies into new buildings helping to reduce their environmental impact.
- 4.16 Objective 7 encourages redevelopment for housing and the regeneration of Hailsham Town Centre. This objective is expected to have significant positive effects in relation to SA objectives 2, 8, 10 and 11 as redevelopment of brownfield land and regeneration of Hailsham Town Centre would enhance the Parish's landscape and townscape, increasing the amount of housing within the parish, help to create a healthy working and living environment and attract more businesses and economic opportunities. A minor positive effect is expected in relation to SA objective 5 as developing on brownfield land as opposed to greenfield land is less likely to increase the risk of flooding through increasing the total area of impermeable surfaces. A minor positive effect with uncertainty is expected in relation to SA objective 1 as although developing on brownfield land prevents potential damage to habitats that otherwise could occur by developing greenfield land, development of brownfield land could also adversely affect habitats and species. This effect is uncertain as effects will depend on the nature of the specific land being developed.
- 4.17 Objective 8 supports new and existing retailers and small businesses. As such, this objective is considered to have significant positive effects in relation to SA objective 11 as supporting existing and new businesses will help to improve quality of life and increase the number and variety and quality of employment opportunities. Minor positive effects are expected in relation to SA objective 9, as supporting existing and new businesses will help to deliver training and enhance skills.
- 4.18 Objective 9 encourages a diversification of the retail and leisure offers in the town. As such, this objective is considered to have significant positive effects in relation to SA objective 11 as diversifying the leisure and retail offer is likely to increase the number, variety and quality of employment opportunities in Hailsham. Minor positive effects are expected in relation to SA objective 9 as diversifying the leisure and retail offer is likely to enhance skills and training opportunities.

Table 4.2 SA scores for the Draft Objectives

SA Objectives	Obj. 1	Obj. 2	Obj. 3	Obj. 4	Obj. 5	Obj. 6	Obj. 7	Obj. 8	Obj. 9
SA1: Protect and enhance biodiversity and geodiversity within the Parish	0	0	+	++	0	0	++?	0	0
SA2: Conserve and enhance the Parish's landscape and townscape.	0	0	+	+	++	++	++	0	0
SA3: Conserve and enhance the Parish's historic environment and cultural assets.	0	0	0	0	++	0	0	0	0
SA4: To maintain and improve the water quality of the Parish's waterbodies and groundwater, and to achieve sustainable water resources management.	0	0	0	+	0	0	0	0	0
SA5: Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.	0	0	0	+	0	0	+	0	0
SA6: Reduce air pollution and minimise traffic, particularly in Hailsham town centre.	+++?	++	++	+	0	++	0	0	0
SA7: Minimise greenhouse gas emissions in the Parish.	+++?	++	++	0	0	++	0	0	0
SA8: Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home.	+++?	0	0	0	0	+	++	0	0
SA9: Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness.	+++?	+	+	0	0	0	0	+	+
SA10: Facilitate improved health and wellbeing of the population including reducing inequalities in health.	+++?	++	++	+	+	+	++	0	0
SA11: Facilitate a sustainable and growing economy that enhances access to employment and business opportunities.	+++?	+	+	0	0	0	++	++	++

Draft Growth Areas Policy

- 4.19 Significant positive effects are expected in relation to SA objectives 2, 6 and 7 as the policy requires applications for development to demonstrate how they will respond to and reflect the positive characteristics of Hailsham and will require development frameworks to contain a movement framework that encourages sustainable modes of travel, prioritising walking, cycling and public transport over private vehicles.
- 4.20 The Draft Growth Areas Policy is expected to have a minor positive effect on SA objective 1 because it encourages good design of development and for applications for development to demonstrate how they respond to the Pevensey Levels and include the integration of green and blue infrastructure.
- 4.21 Draft Growth Areas Policy is expected to have a minor positive effect on SA objectives 8 and 10. The policy encourages the submission of a Building for Life 12 assessment, which should ensure homes are accessible, well-situated, adaptable, suitable for starter homes and for the elderly and has public and private spaces and encourages safe and cohesive communities, therefore, the policy is likely to have positive implications for health and wellbeing.
- 4.22 Negligible effects are expected against all other SA objectives.

Table 4.3 SA scores for Draft Growth Areas Policy

SA Objectives	Draft Growth Areas Policy
SA1: Protect and enhance biodiversity and geodiversity within the Parish.	+
SA2: Conserve and enhance the Parish's landscape and townscape.	++
SA3: Conserve and enhance the Parish's historic environment and cultural assets.	0
SA4: To maintain and improve the water quality of the Parish's waterbodies and groundwater, and to achieve sustainable water resources management.	0
SA5: Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.	0
SA6: Reduce air pollution and minimise traffic, particularly in Hailsham town centre.	++
SA7: Minimise greenhouse gas emissions in the Parish.	++
SA8: Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home.	+
SA9: Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness.	0

SA Objectives	Draft Growth Areas Policy
SA10: Facilitate improved health and wellbeing of the population including reducing inequalities in health.	+
SA11: Facilitate a sustainable and growing economy that enhances access to employment and business opportunities.	0

Draft Town Centre Policy

- 4.23 Significant positive effects are expected in relation to SA objective 11 because the policy encourages proposals that incorporate opportunities for commercial activities to allow for local businesses to start up and grow within the town centre.
- 4.24 Minor positive effects in relation to SA objective 10 are expected because the policy encourages the redevelopment of surface car parks to include a mix of uses that contribute to the vitality of the town centre, (e.g. residential, office, civic and community uses), which could contribute to the cohesion of the community. A minor positive effect is also expected in relation to SA objective 8, as residential use is encouraged on upper floors of the proposed development.
- 4.25 A significant positive effect is expected in relation to SA objective 2 this is because development applications will need to demonstrate how they will reflect local vernacular through the scale and design for builds and use of materials.
- 4.26 Draft Town Centre Policy is expected to have a significant negative effect with uncertainty on SA objective 1 because development in the town centre could result in increased traffic congestion, either through increased movements of delivery and servicing vehicles or by attracting more people from further afield to the town centre. This could result in increased air pollution and greenhouse gas emissions and in hydrological impacts, on the European sites in the parish and surrounding areas. As such, minor negative effects are expected in relation to SA objectives 4, 6 and 7.
- 4.27 Negligible effects are expected against all other SA objectives.

Table 4.4 SA scores for Draft Town Centre Policy

SA Objectives	Draft Town Centre Policy
SA1: Protect and enhance biodiversity and geodiversity within the Parish	--?
SA2: Conserve and enhance the Parish's landscape and townscape.	++?
SA3: Conserve and enhance the Parish's historic environment and cultural assets.	0
SA4: To maintain and improve the water quality of the Parish's waterbodies and groundwater, and to achieve sustainable water resources management.	-

SA Objectives	Draft Town Centre Policy
SA5: Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.	0
SA6: Reduce air pollution and minimise traffic, particularly in Hailsham town centre.	-
SA7: Minimise greenhouse gas emissions in the Parish.	-
SA8: Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home.	+
SA9: Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness.	0
SA10: Facilitate improved health and wellbeing of the population including reducing inequalities in health.	+
SA11: Facilitate a sustainable and growing economy that enhances access to employment and business opportunities.	++

Draft Infill / Design / Character Area Policy

- 4.28 Significant positive effects are expected in relation to SA objectives 2 and 8. This is because development proposals should consider keeping with the character of the existing built form and demonstrate how it will respond to local housing needs.
- 4.29 Minor positive effects are also expected in relation to SA objective 10 because the policy states that development proposals should not result in a loss of local amenity green space and should not have an adverse impact on residential amenity, both of which promote well-being and health of the community.
- 4.30 A mixed minor positive and minor negative effect with uncertainty is expected in relation to SA objectives 6 and 7 as this policy encourages local sustainable transport objectives; however it also states that development proposals must provide adequate parking which may encourage the use of private vehicles which could result in increased air pollution, greenhouse gas emissions and traffic congestion.
- 4.31 The Draft Infill / Design / Character Area Policy is expected to have a significant negative effect with uncertainty on SA objective 1 because development could result in increased traffic congestion and air pollution and in hydrological impacts on the European sites in the parish and surrounding areas. As such, a minor negative impact is also expected in relation to SA objective 4.
- 4.32 Negligible effects are expected against all other SA objectives.

Table 4.5 SA scores for Draft Infill / Design / Character Area Policy

SA Objectives	Draft Infill/ Design/ Character Area Policy
SA1: Protect and enhance biodiversity and geodiversity within the Parish	--?
SA2: Conserve and enhance the Parish's landscape and townscape.	++
SA3: Conserve and enhance the Parish's historic environment and cultural assets.	0
SA4: To maintain and improve the water quality of the Parish's waterbodies and groundwater, and to achieve sustainable water resources management.	-
SA5: Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.	0
SA6: Reduce air pollution and minimise traffic, particularly in Hailsham town centre.	+/-?
SA7: Minimise greenhouse gas emissions in the Parish.	+/-?
SA8: Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home.	++
SA9: Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness.	0
SA10: Facilitate improved health and wellbeing of the population including reducing inequalities in health.	+
SA11: Facilitate a sustainable and growing economy that enhances access to employment and business opportunities.	0

Town-wide Policies: Cuckoo trail / green infrastructure

- 4.33 This policy is expected to have a significant positive effect on SA objective 10 because it supports opportunities that have the potential to better link to the Cuckoo trail for pedestrians and cyclists, which has positive implications on health and wellbeing.
- 4.34 Minor positive effects are expected in relation to SA objectives 2 and 11 since the policy promotes a Public Art project, which also has the potential to positively affect mental health, well-being and the local townscape. This policy encourages exploring the potential for a 'hub,' including a visitor centre, cycle facilities, café and toilets, which could have positive implications for the local economy, by providing jobs and attracting more visitors to the town.

- 4.35 This policy is expected to have a significant positive effect on SA objective 1 because the policy states that the environmental quality of the habitat, biodiversity and trees along Cuckoo trail and in all open spaces in Hailsham should be improved. However this will be mixed with a significant negative effect with uncertainty because this policy could attract additional visitors to the town, due to the development of a hub, which could result in increased traffic congestion and air pollution and in hydrological impacts (due to development of a 'hub') on the European sites in the parish and surrounding areas. As such, a mixed minor positive and minor negative effect is expected in relation to SA objectives 6 and 7 and a minor negative effect in relation to SA objective 4. An Appropriate Assessment is in the process of being completed, which will explore this issue in greater detail.
- 4.36 Negligible effects are expected against all other SA objectives.

Table 4.6 SA scores for Town-wide Policies: Cuckoo trail / green infrastructure

SA Objectives	Town-wide Policies: Cuckoo Trail / green infrastructure
SA1: Protect and enhance biodiversity and geodiversity within the Parish	++/--?
SA2: Conserve and enhance the Parish's landscape and townscape.	+
SA3: Conserve and enhance the Parish's historic environment and cultural assets.	0
SA4: To maintain and improve the water quality of the Parish's waterbodies and groundwater, and to achieve sustainable water resources management.	-
SA5: Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.	0
SA6: Reduce air pollution and minimise traffic, particularly in Hailsham town centre.	+/-
SA7: Minimise greenhouse gas emissions in the Parish.	+/-
SA8: Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home.	0
SA9: Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness.	0
SA10: Facilitate improved health and wellbeing of the population including reducing inequalities in health.	++
SA11: Facilitate a sustainable and growing economy that enhances access to employment and business opportunities.	+

Town-wide Policies: Public transport

- 4.37 Significant positive effects are expected in relation to SA objective 6 because proposals for development should help deliver improved public transport, including an express public transport connection to Polegate and improved bus services.
- 4.38 Minor positive effects with uncertainty are expected in relation to SA objectives 9, 10 and 11 since the policy encourages the delivery of improved public transport, which may enable access to services and education. In addition, an improved public transport system may encourage more people to visit Hailsham, therefore benefiting its economy.
- 4.39 Negligible effects are expected against all other SA objectives.

Table 4.7 SA scores for Town-wide Policies: Public Transport

SA Objectives	Town-wide Policies: Public Transport
SA1: Protect and enhance biodiversity and geodiversity within the Parish	0
SA2: Conserve and enhance the Parish's landscape and townscape.	0
SA3: Conserve and enhance the Parish's historic environment and cultural assets.	0
SA4: To maintain and improve the water quality of the Parish's waterbodies and groundwater, and to achieve sustainable water resources management.	0
SA5: Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.	0
SA6: Reduce air pollution and minimise traffic, particularly in Hailsham town centre.	++
SA7: Minimise greenhouse gas emissions in the Parish.	0
SA8: Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home.	0
SA9: Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness.	+?
SA10: Facilitate improved health and wellbeing of the population including reducing inequalities in health.	+?
SA11: Facilitate a sustainable and growing economy that enhances access to employment and business opportunities.	+?

Town-wide Policies: Community facilities

- 4.40 Town-wide Policies: Community facilities is expected to have a significant negative effect with uncertainty on SA objective 1 because this could result in increased traffic congestion and air pollution and in hydrological impacts on the European sites in the parish and surrounding areas. As such a minor negative effect is expected in relation to SA objective 4 (and 6 and 7 – see below). Significant positive effects are expected in relation to SA objective 10 as the policy supports the enhancement and provision of additional community facilities, which has positive implications for community health and well-being.
- 4.41 Minor positive effects are expected in relation to SA objective 2 because the policy encourages the design of community facilities to accord with good practice principles.
- 4.42 Mixed minor positive and minor negative effects are expected in relation to SA objectives 6 and 7 because the policy ensures all facilities should be easily accessible to everyone, and provide for good walking and cycling connections, and where possible, be located close to public transport. However, an increase in community facilities could have a negative effect on air pollution and traffic congestion if private vehicles are utilised.
- 4.43 Negligible effects are expected against all other SA objectives.

Table 4.8 SA scores for Town-wide Policies: Community facilities

SA Objectives	Town-wide Policies: Community facilities
SA1: Protect and enhance biodiversity and geodiversity within the Parish	--?
SA2: Conserve and enhance the Parish's landscape and townscape.	+
SA3: Conserve and enhance the Parish's historic environment and cultural assets.	0
SA4: To maintain and improve the water quality of the Parish's waterbodies and groundwater, and to achieve sustainable water resources management.	-
SA5: Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.	0
SA6: Reduce air pollution and minimise traffic, particularly in Hailsham town centre.	+/-
SA7: Minimise greenhouse gas emissions in the Parish.	+/-
SA8: Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home.	0
SA9: Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness.	0

SA Objectives	Town-wide Policies: Community facilities
SA10: Facilitate improved health and wellbeing of the population including reducing inequalities in health.	++
SA11: Facilitate a sustainable and growing economy that enhances access to employment and business opportunities.	0

Town-wide Policies: Employment

- 4.44 Town-wide Policies: Employment is expected to have a significant negative effect with uncertainty on SA objective 1 because employment development could result in increased traffic congestion and air pollution and in hydrological impacts on the European sites in the parish and surrounding areas. As such, this policy is expected to have a minor negative effect on SA objective 4 (and 6 and 7 – see below).
- 4.45 Significant positive effects are expected in relation to SA objective 11 because the policy encourages opportunities that provide for local employment opportunities and that diversify the business offer in the main employment areas.
- 4.46 Minor positive effects are expected in relation to SA objective 2 since new employment proposals will be subject to design and landscape assessments. In addition development will be encouraged to be in line with best practice design principles.
- 4.47 Mixed minor positive and minor negative effects are expected in relation to SA objectives 6 and 7 because new employment proposals will be subject to traffic impact assessments, which are expected to identify potential traffic issues and propose mitigation for these. In addition, local employment opportunities are welcomed particularly where they reduce out-commuting, therefore reducing the need for residents to travel in order to access employment. However, with increased employment opportunities it is likely air pollution, traffic congestion and greenhouse gas emissions will increase as a result in increased in-commuting or vehicular traffic associated with deliveries and servicing.

Table 4.9 SA scores for Town-wide Policies: Employment

SA Objectives	Town-wide Policies: Employment
SA1: Protect and enhance biodiversity and geodiversity within the Parish	--?
SA2: Conserve and enhance the Parish's landscape and townscape.	+
SA3: Conserve and enhance the Parish's historic environment and cultural assets.	0
SA4: To maintain and improve the water quality of the Parish's waterbodies and groundwater, and to achieve sustainable water	-

SA Objectives	Town-wide Policies: Employment
resources management.	
SA5: Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.	0
SA6: Reduce air pollution and minimise traffic, particularly in Hailsham town centre.	+/-
SA7: Minimise greenhouse gas emissions in the Parish.	+/-
SA8: Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home.	0
SA9: Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness.	0
SA10: Facilitate improved health and wellbeing of the population including reducing inequalities in health.	0
SA11: Facilitate a sustainable and growing economy that enhances access to employment and business opportunities.	++

5 SA findings for the Neighbourhood Plan

- 5.1 This section describes the findings of the SA in relation to the Vision, Objectives and policies for the Hailsham Neighbourhood Plan. The likely effects of the Vision, Objectives and policies are summarised below in the order in which they appear in the Submission Neighbourhood Plan.

Hailsham Tomorrow

Vision

- 5.2 The Vision for the Neighbourhood Plan is:

"By 2028 Hailsham will be recognised as a destination for leisure, shopping & culture. It will have embraced and harnessed its growth potential and benefitted from the necessary infrastructure to support and retain its strong sense of community, civic pride and social wellbeing. Hailsham will be established as a balanced, well-proportioned and prosperous town offering its residents a high quality of life.

The town centre will be an appealing and pleasant retail and leisure destination which attracts visitors from far and wide (many via public transport from rail services at Polegate) into the unique historic market town served by modern and desirable facilities and amenities. Growth will deliver excellent schooling choices and new further education opportunities, good medical provision and care services.

An improved core retail area will support a diverse mix of independent and national shops and businesses bringing with it strong employment prospects for the town. A network of enhanced and connected green spaces, centred around the Cuckoo Trail will support an active and healthy community. The wetlands remain an asset of recreation and wellbeing for the community of Hailsham. Together with improvements to pedestrian and cycling links across the town, Hailsham residents will benefit from a safe and healthier alternative to car-based travel."

- 5.3 Key features of the vision are:

- Making Hailsham an attractive destination for leisure, shopping and culture.
- Creating a connected and expanded mixed retail area.
- Improved non-motorised transportation.
- Connected green spaces for a healthy community.

Assessment of the Vision

- 5.4 The Vision sets out a general aspiration for Hailsham's growth and development to foster a high quality of life. Significant positive effects (++) are expected in relation to SA objective 6, 7, 9, 10 and 11 as the vision refers to improved pedestrian and cycling links, improving retail offer to improve employment prospects, providing excellent schooling and medical facilities. Minor positive effects (+) are expected in relation to SA objective 2, as the vision refers to an improved town centre with a diverse mix of independent and national shops and businesses. The Vision is unlikely to result in significant adverse effects. Most of the effects in the vision are subject to some uncertainty since their details will depend on the detail of the individual NDP policies.

Table 5.1 SA scores for the vision

SA Objectives	Vision
SA1: Protect and enhance biodiversity and geodiversity within the Parish	0
SA2: Conserve and enhance the Parish's landscape and townscape.	+?
SA3: Conserve and enhance the Parish's historic environment and cultural assets.	0
SA4: To maintain and improve the water quality of the Parish's waterbodies and groundwater, and to achieve sustainable water resources management.	0
SA5: Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.	0
SA6: Reduce air pollution and minimise traffic, particularly in Hailsham town centre.	++?
SA7: Minimise greenhouse gas emissions in the Parish.	++?
SA8: Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home.	0
SA9: Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness?	++?
SA10: Facilitate improved health and wellbeing of the population including reducing inequalities in health.	++?
SA11: Facilitate a sustainable and growing economy that enhances access to employment and business opportunities.	++?

Objectives

5.5 The vision is supported by 9 strategic objectives:

- 1 Development delivers the necessary facilities and infrastructure in accessible locations for existing and new communities alike.
- 2 Existing pedestrian and cycling routes are preserved and enhanced. The Cuckoo Trail will be improved as a multi-functional route for tourism, travel and recreation, further linking Hailsham to its surrounding communities.
- 3 New developments will create well connected, attractive cycling and pedestrian routes, providing seamless integration with the existing urban areas and public green spaces to encourage a reduction in car based travel.

- 4 Existing habitats and green infrastructure networks are protected and enhanced through sensitive development to encourage local habitat improvement and creation.
- 5 The character and setting of Hailsham's conservation area, statutory listed buildings and locally listed buildings are protected by fostering a high-quality design approach which promotes design innovation and reinforces the distinct local character areas of Hailsham.
- 6 Improve local air quality and provide reductions in carbon emissions by supporting local renewable energy generation.
- 7 Encourage the appropriate re-development of previously developed land to help meet housing need and encourage the regeneration of Hailsham Town Centre.
- 8 Protect and encourage the development of retail and commercial spaces which meet identified local need, to support new and existing small businesses and local retailers whilst also attracting inward investment into Hailsham.
- 9 Support existing retailers in Hailsham and encourage a diversification of the retail and leisure offers in the town to attract new shoppers and visitors.

Assessment of the Objectives

- 5.6 The likely sustainability effects are summarised in **Table 5.2**.
- 5.7 The strategic objectives are unlikely to have any significant negative effects. Most of the objectives are likely to have significant positive, minor positive effects, or negligible effects in relation to the SA objectives. All the objectives are expected to have a significant positive effect against at least one SA objective, where they directly address the SA objectives. No minor negative effects are expected from the draft objectives, with the exception of draft objective 7, which is expected to have mixed minor negative and positive effects with uncertainty in relation to SA objective 1
- 5.8 Objective 1 supports the delivery of accessible facilities and infrastructure. It has been assumed that 'facilities and infrastructure' encompasses a wide range of items, including transport infrastructure, health and educational facilities and employment space, however the objectives does not specify which facilities and infrastructure. As such, this objective is expected to have significant positive effects with uncertainty in relation to SA objectives, 8, 9, 10 and 11.
- 5.9 Significant positive effects with uncertainty are also expected in relation to SA objectives 6 and 7; this is because the objective supports transport infrastructure and reduced need to travel.
- 5.10 Objective 2 supports the enhancement of pedestrian and cycling routes. Enhancement of pedestrian and cycle routes will help to reduce reliance on private vehicles thereby helping to reduce traffic and associated greenhouse gas emissions and help to create a healthy and safe working and living environment. As such, this objective directly addresses SA objectives 6, 7, and 10.
- 5.11 Minor positive effects are expected in relation to SA objectives 9 and 11 because the enhancement of pedestrian and cycling routes could increase access to educational facilities and job opportunities.
- 5.12 Objective 3 supports development that creates well connected walking and cycling routes, so that reliance on car based travel is reduced. Enhancement of pedestrian and cycling routes will help to promote health and wellbeing, improve connectivity to green spaces, reduce reliance on private vehicles thereby helping to reduce traffic and associated greenhouse gas emissions, increase access to educational and health facilities, job opportunities and help to create a healthy and safe working and living environment. As such, this objective addresses SA objectives 6, 7, and 10.
- 5.13 Minor positive effects are expected in relation to SA objectives 1, 2, 9 and 11 because the enhancement of pedestrian and cycling routes could increase access to educational facilities and job opportunities. Additionally, enhancing connectivity to public green space could enhance the townscape and protect biodiversity.
- 5.14 Objective 4 supports the protection and enhancement of habitats and green infrastructure networks, which directly addresses SA objective 1, for which significant positive effects are expected. Minor positive effects also expected in relation to SA objectives 2, 4, 5, 6 and 10. This is because enhancements to habitats and green infrastructure are likely to have a number of

associated benefits including improving the quality of the landscape and water quality, reducing the risk of flooding by reducing surface water runoff, reducing air pollution and helping to create a healthy living and working environment.

- 5.15 Objective 5 supports protecting the character of Hailsham through protecting Hailsham's conservation area and listed buildings, by fostering innovative and high quality design, therefore directly addresses SA objectives 2 and 3 for which significant positive effects are expected. A minor positive effect is expected in relation to SA objective 10 as improvements to the character and setting of Hailsham would help to improve the working and living environment and improve quality of life within the town.
- 5.16 Objective 6 supports improvements to local air quality and reductions in carbon emissions by supporting local renewable energy generation. As such, significant positive effects are expected in relation to SA objectives 6 and 7 which relate to the minimising air pollution and reduction of greenhouse gas emissions. Minor positive effects are also expected in relation to SA objectives 8 and 10 as this objective has the potential to improve air quality which can help to create a healthy work and living environment, as well as promote the integration of renewable technologies into new buildings helping to reduce their environmental impact.
- 5.17 Objective 7 encourages redevelopment for housing and the regeneration of Hailsham Town Centre. This objective is expected to have significant positive effects in relation to SA objectives 2, 8, 10 and 11 as redevelopment of brownfield land and regeneration of Hailsham Town Centre would enhance the Parish's landscape and townscape, increasing the amount of housing within the parish, help to create a healthy working and living environment and attract more businesses and economic opportunities. A minor positive effect is expected in relation to SA objective 5 as developing on brownfield land as opposed to greenfield land is less likely to increase the risk of flooding through increasing the total area of impermeable surfaces. A minor positive effect with uncertainty is expected in relation to SA objective 1 as although developing on brownfield land prevents potential damage to habitats that otherwise could occur by developing greenfield land, development of brownfield land could also adversely affect habitats and species. This effect is uncertain as effects will depend on the nature of the specific land being developed.
- 5.18 Objective 8 supports new and existing retailers and small businesses. As such, this objective is considered to have significant positive effects in relation to SA objective 11 as supporting existing and new businesses will help to improve quality of life and increase the number and variety and quality of employment opportunities. Minor positive effects are expected in relation to SA objective 9 as supporting existing and new businesses will help to deliver training and enhance skills.
- 5.19 Objective 9 encourages a diversification of the retail and leisure offers in the town. As such, this objective is considered to have significant positive effects in relation to SA objective 11 as diversifying the leisure and retail offer is likely to increase the number, variety and quality of employment opportunities in Hailsham. Minor positive effects are expected in relation to SA objective 9 as diversifying the leisure and retail offer is likely to enhance skills and training opportunities.

Table 5.2 SA scores for the objectives

SA Objectives	Obj. 1	Obj .2	Obj .3	Obj .4	Obj .5	Obj. 6	Obj.7	Obj .8	Obj .9
SA1: Protect and enhance biodiversity and geodiversity within the Parish	0	0	+	++	0	0	++?	0	0
SA2: Conserve and enhance the Parish's landscape and townscape.	0	0	+	+	++	++	++	0	0
SA3: Conserve and enhance the Parish's historic environment and cultural assets.	0	0	0	0	++	0	0	0	0
SA4: To maintain and improve the water quality of the Parish's waterbodies and groundwater, and to achieve sustainable water resources management.	0	0	0	+	0	0	0	0	0
SA5: Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.	0	0	0	+	0	0	+	0	0
SA6: Reduce air pollution and minimise traffic, particularly in Hailsham town centre.	++?	++	++	+	0	++	0	0	0
SA7: Minimise greenhouse gas emissions in the Parish.	++?	++	++	0	0	++	0	0	0
SA8: Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home.	++?	0	0	0	0	+	++	0	0
SA9: Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness.	++?	+	+	0	0	0	0	+	+
SA10: Facilitate improved health and wellbeing of the population including reducing inequalities in health.	++?	++	++	+	+	+	++	0	0
SA11: Facilitate a sustainable and growing economy that enhances access to employment and business opportunities.	++?	+	+	0	0	0	++	++	++

Policy HAIL HRA1: Habitats Regulations

5.20 Significant positive effects are expected in relation to SA objective 1 as this policy protects against likely significant effects on designated European sites, notably the Ashdown Forest Special Area of Conservation (SAC) and Special Protection Area (SPA); the Pevensy Levels Ramsar Site and SAC and Lewes Downs SAC, thereby helping to protect biodiversity by preserving the ecological integrity of these sites. In addition, any proposals for development must be accompanied by information to allow an HRA of the impacts of the development to be completed; thereby ensuring development does not adversely affect the sites.

Minor positive effects are expected in relation to SA objectives 4 and 5. The protection against adverse effects on European Sites reduces the likelihood of development having an adverse effect on water quality of water bodies, notably at the Pevensy Levels, Ramsar and SAC. Additionally, development may only be permitted if there is sufficient capacity at the relevant Waste Water Treatment Works or an alternative foul water drainage solution. Furthermore, if impermeable surfaces are proposed within the hydrological catchment area then mitigation, such as SUDs, will be required. As such, SUDs help to reduce the risk of flooding and adverse effects on water quality from surface water runoff.

5.21 Minor positive effects are expected in relation to SA objectives 2 and 10 as the Pevensy Levels Ramsar and SAC forms an important landscape feature and green infrastructure feature used for recreational purposes. As such, the protection provided through this is expected to, in turn, help to protect the Pevensy Levels as a recreational and landscape asset. In addition, this policy promotes the inclusion of electric vehicle infrastructure, by encouraging the use of electric vehicles and therefore reducing air pollution, which is expected to improve health and wellbeing.

5.22 Minor positive effects are expected in relation to SA objective 7 as all new development must provide appropriate electric vehicle (EV) charging infrastructure. As such, EV charging infrastructure supports the reduction of greenhouse gas emissions within Hailsham. Additionally, providing infrastructure that can be expanded to provide additional charging station is included to enable future provision of EV charging points, encouraging long term use of electric vehicles and associated reduction of greenhouse gas emissions.

5.23 Minor positive effects are expected in relation to SA objective 11 as requiring all new development to have the ability to connect to high speed broadband allows residents to work from home and may encourage businesses to establish themselves in the area, therefore facilitating a growing economy and increasing connectivity to employment and business opportunities.

5.24 Mixed minor positive and minor negative effects are expected in relation to SA objective 6 as this policy promotes the inclusion of electric vehicle infrastructure, by encouraging the use of electric vehicles and therefore reducing air pollution. However, by avoiding the European sites, there is the potential for more traffic to travel through Hailsham town, thereby increasing traffic congestion and air pollution in this location.

5.25 Negligible effects are expected against all other SA objectives.

Table 5.3 SA Scores for draft policy HRA1

SA Objectives	HRA1
SA1: Protect and enhance biodiversity and geodiversity within the Parish	++
SA2: Conserve and enhance the Parish's landscape and townscape.	+

SA Objectives	HRA1
SA3: Conserve and enhance the Parish's historic environment and cultural assets.	0
SA4: To maintain and improve the water quality of the Parish's waterbodies and groundwater, and to achieve sustainable water resources management.	+
SA5: Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.	+
SA6: Reduce air pollution and minimise traffic, particularly in Hailsham town centre.	+/-
SA7: Minimise greenhouse gas emissions in the Parish.	+
SA8: Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home.	0
SA9: Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness.	0
SA10: Facilitate improved health and wellbeing of the population including reducing inequalities in health.	+
SA11: Facilitate a sustainable and growing economy that enhances access to employment and business opportunities.	+

Design Quality

Policy HAIL D1: High Quality Design

- 5.26 Significant positive effects are expected in relation to SA objective 2. This policy encourages development that implements green walls, roofs and SUDs, which could contribute to an attractive built environment, as well as designs that respond to the surrounding townscape and landscape and display a high level of architectural quality which responds positively to local context.
- 5.27 Minor positive effects are expected in relation to SA objectives 1, 3, 4, 5, 6 and 7. This policy encourages the creation of well connected, accessible places thereby reducing the likelihood of private vehicle journeys and related greenhouse gas emissions and promoting more sustainable modes of transport, such as walking and cycling. In addition, this policy encourages integration of green walls, roofs and SUDs which help to enhance biodiversity and reduce the risk of flooding and adverse effects on water quality from surface water runoff. Furthermore, this policy supports development proposals that respond to the landscape, local and longer-views, the environmental and historic assets.
- 5.28 Minor positive effects are also expected in relation to SA objective 8 because this policy encourages the use of sustainable features, including green walls and SUDs; however the policy does not address affordability or energy efficiency directly.
- 5.29 Minor positive effects are also expected in relation to SA objective 10 as promoting forms of active travel and high standards for amenity, such as natural light and minimising overlooking, would benefit mental and physical health. In addition, by encouraging applications for major

developments to submit a Building for Life 12 assessment this policy would also benefit health and wellbeing by ensuring homes are suitable for a range of ages and abilities.

5.30 Negligible effects are expected against all other SA objectives.

Policy HAIL D2: Small scale residential development and householder extensions

5.31 Policy D2 is expected to have a minor positive effect on SA objective 1 because it supports development that does not adversely impact biodiversity, however this is mixed with a significant negative effect with uncertainty, because the HRA screening identified that a likely significant effect could not be ruled out on the basis that development could result in increased traffic congestion and air pollution and in hydrological impacts on the European sites in the parish and surrounding areas. As such, minor negative effects are also expected in relation to SA objectives 4, 6 and 7. Note that an Appropriate Assessment has been completed, as discussed within the Cumulative Effects section.

5.32 Minor positive effects are expected in relation to SA objectives 2 and 3 because this policy supports small-scale and infill development that is in keeping with the existing built form (including historic environment).

5.33 Negligible effects are expected against all other SA objectives.

Policy HAIL D3: Innovation and Variety

5.34 Significant positive effects are expected in relation to SA objective 2 as this policy actively encourages innovative, bespoke design of housing that responds to and reinterprets local design cues thereby helping to protect and enhance landscape and townscape quality and distinctiveness.

5.35 Negligible effects are expected against all other SA objectives.

Policy HAIL D4: Design for self and custom build homes

5.36 Significant positive effects are expected in relation to SA objective 2 because this policy requires sites for self-build and custom-build housing to submit a masterplan for approval, which sets parameters for the built form, thereby helping to protect and improve local landscape townscape quality, distinctiveness and character.

5.37 Negligible effects are expected against all other SA objectives.

Policy HAIL D5: Residential Car Parking Design

5.38 Significant positive effects are expected in relation to SA objective 2 because this policy encourages residential parking that does not undermine the quality of the street environment thereby helping to protect local landscape quality, distinctiveness and character.

5.39 A minor positive effect is expected for SA objective 1 as this policy encourages the use of street trees, which could provide benefits for biodiversity.

5.40 Negligible effects are expected against all other SA objectives.

Table 5.4 SA Scores for draft policies D1 to D5

SA Objectives	D1	D2	D3	D4	D5
SA1: Protect and enhance biodiversity and geodiversity within the Parish.	+	+/--?	0	0	+

SA Objectives	D1	D2	D3	D4	D5
SA2: Conserve and enhance the Parish's landscape and townscape.	++	+	++	++	++
SA3: Conserve and enhance the Parish's historic environment and cultural assets.	+	+	0	0	0
SA4: To maintain and improve the water quality of the Parish's waterbodies and groundwater, and to achieve sustainable water resources management.	+	-	0	0	0
SA5: Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.	+	0	0	0	0
SA6: Reduce air pollution and minimise traffic, particularly in Hailsham town centre.	+	-	0	0	0
SA7: Minimise greenhouse gas emissions in the Parish.	+	-	0	0	0
SA8: Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home.	+	0	0	0	0
SA9: Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness.	0	0	0	0	0
SA10: Facilitate improved health and wellbeing of the population including reducing inequalities in health.	+	0	0	0	0
SA11: Facilitate a sustainable and growing economy that enhances access to employment and business opportunities.	0	0	0	0	0

Promoting Active, Smarter and Sustainable Travel

Policy HAIL AT1: Active Travel

- 5.41 Significant positive effects are expected in relation to SA objectives 6, 7, and 10 as this policy encourages active travel through delivery of walking and cycling routes that reduce reliance on vehicular movements. As such, this policy will help to promote sustainable transport links, reduce pollution and greenhouse gas emissions from vehicles, and facilitate improved health and wellbeing through encouraging greater physical activity.
- 5.42 The HRA screening identified that a likely significant effect could not be ruled out on the basis that development could result in increased traffic congestion and air pollution and in hydrological impacts on the European sites in the parish and surrounding areas. However, negligible uncertain effects have been identified against SA objective 1 because encouraging active travel is expected to reduce car use and related air pollution and not increase emissions within proximity of any European site. In addition, the policy does not propose any new development; therefore it is uncertain how this policy could affect hydrology. Note that an Appropriate Assessment has been completed, as discussed within the Cumulative Effects section.
- 5.43 Minor positive effects are expected in relation to SA objectives 9 and 11 because by supporting the provision of connections for active and more sustainable modes of travel it is likely access to jobs and education within Hailsham will increase.
- 5.44 Negligible effects are expected against all other SA objectives.

Policy HAIL AT2: The Cuckoo Trail

- 5.45 Policy AT2 is expected to have a minor positive effect on SA objective 1 because it supports the enhancement of habitats along the length of the trail helping to conserve biodiversity. However, this will be mixed with a significant negative effect with uncertainty because the HRA screening identified that a likely significant effect could not be ruled out on the basis that development could result in increased traffic congestion and air pollution and in hydrological impacts on the European sites in the parish and surrounding areas. Whilst improvements to the Cuckoo Trail could attract more visitors to the town (see below), the policy does not propose any new development; therefore it is uncertain how this policy could affect hydrology. Note that an Appropriate Assessment has been completed, as discussed within the Cumulative Effects section.
- 5.46 This policy is expected to have a mixed minor positive and minor negative effect on SA objectives 6 and 7. This is because improvements to the Cuckoo Trail could attract more visitors to Hailsham and therefore increase traffic congestion, air pollution and greenhouse gas emissions; however, since the policy promotes sustainable transport links, it could help to minimise overall air pollution and greenhouse gas emissions.
- 5.47 Significant positive effects are also expected in relation to SA objective 10 because this policy supports the enhancement of the strategic walking and cycling route, as well as incorporating new walking and cycling to and from the Cuckoo Trail. As such this policy will facilitate improved health and wellbeing through encouraging increased levels of physical activity.
- 5.48 Minor positive effects are expected in relation to SA objective 2 because this policy supports the creation of active fronts within development along the trail, as well as enhancing the environmental quality along the route of the trail, thereby helping to conserve and enhance townscape and landscape.
- 5.49 Negligible effects are expected against all other SA objectives.

Policy HAIL AT3: Public transport

- 5.50 Significant positive effects are expected for SA objectives 6 and 7 as this policy supports improved public transport services through improving frequency of routes, waiting facilities, and connectivity to Polegate railway station. As such, this policy could decrease reliance on private vehicles helping to minimise air pollution and greenhouse gas emissions.

- 5.51 Minor positive effects are expected in relation to SA objectives 9, 10 and 11 as this policy supports improved public transport services which could improve access to health facilities and employment and education opportunities in Hailsham and beyond
- 5.52 The HRA screening identified that a likely significant effect could not be ruled out on the basis that development could result in increased traffic congestion and air pollution and in hydrological impacts on the European sites in the parish and surrounding areas. However, negligible uncertain effects have been identified against SA objective 1 because encouraging use of public transport is expected to reduce car use and related air pollution and not increase emissions within proximity of any European site. In addition, the policy does not propose any new development; therefore it is uncertain how this policy could affect hydrology. Note that an Appropriate Assessment has been completed, as discussed within the Cumulative Effects section.
- 5.53 Negligible effects are expected against all remaining SA objectives.

Table 5.5 SA Scores for draft policies AT1 to AT3

SA Objectives	AT1	AT2	AT3
SA1: Protect and enhance biodiversity and geodiversity within the Parish	0?	+/--?	0?
SA2: Conserve and enhance the Parish's landscape and townscape.	0	+	0
SA3: Conserve and enhance the Parish's historic environment and cultural assets.	0	0	0
SA4: To maintain and improve the water quality of the Parish's waterbodies and groundwater, and to achieve sustainable water resources management.	0	0	0
SA5: Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.	0	0	0
SA6: Reduce air pollution and minimise traffic, particularly in Hailsham town centre.	++	+/-	++
SA7: Minimise greenhouse gas emissions in the Parish.	++	+/-	++
SA8: Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home.	0	0	0
SA9: Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness.	+	0	+
SA10: Facilitate improved health and	++	++	+

SA Objectives	AT1	AT2	AT3
wellbeing of the population including reducing inequalities in health.			
SA11: Facilitate a sustainable and growing economy that enhances access to employment and business opportunities.	+	0	+

Enhancing Green Space and Biodiversity Value

Policy HAIL GS1: Natural and amenity green space

- 5.54 Significant effects are expected in relation to SA objective 10 as this policy supports enhancements to natural and amenity green space through a range of proposals including, improving links between Hailsham and the surrounding landscape, enhancing habitats and improving quality of public spaces. As such, this policy will help to create a healthy and safe working and living environment.
- 5.55 Significant positive effects are also expected in relation to SA objectives 4 and 5 as this policy encourages the use of SUDs which could help to conserve and enhance water quality and reduce the risk flooding by reducing the risk of surface water runoff.
- 5.56 Policy GS1 is expected to have a significant positive uncertain effect on SA objective 1 because it supports the enhancement of habitats and biodiversity, however the HRA screening identified that a likely significant effect could not be ruled out on the basis that development could result in increased traffic congestion and air pollution and in hydrological impacts on the European sites in the parish and surrounding areas and the second stated that there will likely be no effect. However, this policy does not allocate any development, nor is it expected to generate additional traffic, therefore negative effects on SA objective 1 are considered unlikely. Note that an Appropriate Assessment has been completed, as discussed within the Cumulative Effects section.
- 5.57 Minor positive effects are expected for SA objectives 2, 6 and 7 because this policy supports enhanced natural and amenity green space which will help to protect and enhance the landscape and townscape. In addition, the enhancement of green features helps to remove pollutants from the air, as well as supporting the creation of sustainable links between Hailsham and the surrounding landscape which could help to minimise greenhouse gas emissions from private vehicles.
- 5.58 Negligible effects are expected against all remaining SA objectives.

Policy HAIL GS2: Open space within major development areas

- 5.59 Significant positive effects are expected in relation to SA objective 10 because this policy encourages the provision of open space within development sites, thereby helping to create a healthy living environment and improve quality of life for all.
- 5.60 Minor positive effects are expected for SA objective 2 as provision of open space within major development areas could enhance the quality and character of the townscape and landscape.
- 5.61 Policy GS2 is expected to have a minor positive effect on SA objective 1 because it supports the provision of open space within major development areas which could provide habitats to support biodiversity. However, this is uncertain as the HRA screening identified that a likely significant effect could not be ruled out on the basis that development could result in increased traffic congestion and air pollution and in hydrological impacts on the European sites in the parish and surrounding areas. However, open space is expected to serve residents of the development and therefore would not generate traffic outside of Hailsham. In addition, the policy will not lead to development; therefore it is uncertain how hydrology could be affected. As such, no negative

effects have been identified. Note that an Appropriate Assessment has been completed, as discussed within the Cumulative Effects section.

5.62 Negligible effects are expected for all remaining SA objectives.

Policy HAIL GS3: Pevensey Levels

- 5.63 Significant positive effects are expected in relation to SA objective 2 because this policy supports the protection of the Pevensey Levels, recognised for its landscape importance, by requiring development to demonstrate that there are no detrimental impacts to the setting and quality of the Pevensey Levels. Furthermore this policy requires applications adjacent to the Pevensey Levels to integrate natural green space.
- 5.64 Policy GS3 is expected to have a significant positive effect on SA objective 1 because this policy requires all applications adjacent to the Pevensey Levels to the quality of the Pevensey levels and requires applications to conduct an HRA assessment. However, the HRA screening identified that a likely significant effect could not be ruled out on the basis that development could result in increased traffic congestion and air pollution, recreational pressure and in hydrological impacts on the European sites in the parish and surrounding areas. However, uncertainty has been identified against SA objective 1 because this policy also provides green space that could redirect recreational pressure from the Pevensey Levels. In addition, the policy is not expected to lead to an increase in traffic and does not propose any development, so it is uncertain how hydrological effects could arise. As such, no negative effects have been identified, although uncertainty has been recorded against the significant positive effect. An Appropriate Assessment has been completed, as discussed within the Cumulative Effects section.
- 5.65 Minor positive effects are expected for SA objectives 5 and 10 as the policy supports the incorporation of SUDS, which could help to reduce the risk flooding by contributing to infiltration and storage of surface water and the provision of semi-natural green space which could help to create a healthy living and working environment.
- 5.66 Negligible effects are expected against all other SA objectives.

Table 5.6 SA scores for draft policies GS1 to GS3

SA Objectives	GS1	GS2	GS3
SA1: Protect and enhance biodiversity and geodiversity within the Parish	++?	+	++?
SA2: Conserve and enhance the Parish's landscape and townscape.	+	+	++
SA3: Conserve and enhance the Parish's historic environment and cultural assets.	0	0	0
SA4: To maintain and improve the water quality of the Parish's waterbodies and groundwater, and to achieve sustainable water resources management.	++	0	0
SA5: Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.	++	0	+
SA6: Reduce air pollution and minimise traffic, particularly in Hailsham town centre.	+	0	0
SA7: Minimise greenhouse gas emissions in the Parish.	+	0	0
SA8: Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home.	0	0	0
SA9: Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness.	0	0	0
SA10: Facilitate improved health and wellbeing of the population including reducing inequalities in health.	++	++	+
SA11: Facilitate a sustainable and growing economy that enhances access to employment and business opportunities.	0	0	0

Employment

Policy HAIL EMP1: Providing for a mix of employment opportunities

- 5.67 Policy EMP1 is expected to have a significant negative effect with uncertainty on SA objective 1 because employment development could result in increased traffic congestion and air pollution and in hydrological impacts on the European sites in the parish and surrounding areas. As such, this policy is also expected to have a minor negative effect on SA objective 4 (and 6 and 7 – see below). Note that an Appropriate Assessment has been completed, as discussed within the Cumulative Effects section.
- 5.68 Significant positive effects are expected in relation to SA objectives 9 and 11 as this policy supports provision of local employment opportunities, including different sized businesses, and supports applications that diversify the business offer in the main employment areas. As such, this policy is likely to increase the number, variety and quality of employment opportunities and help to increase training and skills.
- 5.69 Mixed minor positive and minor negative effects are expected in relation to SA objectives 6 and 7, as this policy supports opportunities that provide for local employment opportunities that could result in increased traffic congestion and air pollution, however, reducing out-commuting is supported through local opportunities, so air pollution, traffic congestion and greenhouse gas emissions could be reduced.
- 5.70 Minor positive effects are expected in relation to SA objective 10 as this policy supports provision of local employment opportunities, including diversification of business which could in turn improve the quality of life for Hailsham’s residents.
- 5.71 Negligible effects are expected against all other SA objectives.

Table 5.7 SA score for draft policy EMP1

SA Objectives	EMP1
SA1: Protect and enhance biodiversity and geodiversity within the Parish	--?
SA2: Conserve and enhance the Parish’s landscape and townscape.	0
SA3: Conserve and enhance the Parish’s historic environment and cultural assets.	0
SA4: To maintain and improve the water quality of the Parish’s waterbodies and groundwater, and to achieve sustainable water resources management.	-
SA5: Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.	0
SA6: Reduce air pollution and minimise traffic, particularly in Hailsham town centre.	+/-

SA Objectives	EMP1
SA7: Minimise greenhouse gas emissions in the Parish.	+/-
SA8: Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home.	0
SA9: Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness.	++
SA10: Facilitate improved health and wellbeing of the population including reducing inequalities in health.	+
SA11: Facilitate a sustainable and growing economy that enhances access to employment and business opportunities.	++

Community Facilities

Policy HAIL CF1: community facilities

- 5.72 Significant positive effects for policy CF1 have been identified in relation to SA objectives 9 and 10. Policy CF1 supports enhancement and provision of community facilities, including education and healthcare. By having these facilities accessible by more sustainable modes of transport, such as walking and cycling, it may encourage active transport, which can benefit physical wellbeing. In addition, community halls can be hubs for community activities, including social clubs and exercise classes, which benefit physical, social and mental wellbeing.
- 5.73 Policy CF1 is expected to have a significant negative effect with uncertainty on SA objective 1 because community facility development could result in increased traffic congestion and air pollution and in hydrological impacts on the European sites in the parish and surrounding areas. As such, this policy is also expected to have a minor negative effect on SA objective 4 (and 6 and 7 – see below). Note that an Appropriate Assessment has been completed, as discussed within the Cumulative Effects section.
- 5.74 Policy CF1 is expected to have a mixed minor positive and minor negative effect in relation to SA objectives 6 and 7. It specifically states that all facilities should be easily accessible to everyone and provide for good walking and cycling connections, as well as being located close to public transport, so use of sustainable modes of transport is encouraged. However, there is potential for community facilities to attract people to Hailsham from surrounding communities and areas which could result in increased air pollution, greenhouse gas emissions and traffic congestion in the Parish. Providing parking provision could encourage people to drive to the facility rather than travel by sustainable transport, although this could be reduced by restricting parking to provision for those with mobility issues.
- 5.75 Negligible effects are expected against all other SA objectives, as the policy does not directly propose development therefore the majority of environmental objectives are unlikely to be affected.

Table 5.8 SA scores for draft policy CF1

SA Objectives	CF1
SA1: Protect and enhance biodiversity and geodiversity within the Parish	--?
SA2: Conserve and enhance the Parish's landscape and townscape.	0
SA3: Conserve and enhance the Parish's historic environment and cultural assets.	0
SA4: To maintain and improve the water quality of the Parish's waterbodies and groundwater, and to achieve sustainable water resources management.	-
SA5: Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.	0
SA6: Reduce air pollution and minimise traffic, particularly in Hailsham town centre.	+/-
SA7: Minimise greenhouse gas emissions in the Parish.	+/-
SA8: Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home.	0
SA9: Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness.	++
SA10: Facilitate improved health and wellbeing of the population including reducing inequalities in health.	++
SA11: Facilitate a sustainable and growing economy that enhances access to employment and business opportunities.	0

Tourism

Policy HAIL TOU1: Tourism

- 5.76 Minor positive effects for Policy TOU1 have been identified in relation to SA objectives 2, 3, and 10 because it supports sustainable development. New development is encouraged to have strong regard for the local character, historic and natural assets of the surrounding area, townscape and the historic environment. The policy also supports the provision of green infrastructure, which could benefit both wildlife and people.
- 5.77 Minor positive effects are also expected for SA objective 10 because it is likely the policy will provide benefits for the local economy and community. Tourist facilities, attractions and accommodation may provide new jobs and increase spending in the town.
- 5.78 Policy TOU1 is expected to have a minor positive effect on SA objective 1 because it encourages conserving local biodiversity, however this will be mixed with a significant negative effect with uncertainty because the HRA screening identified that a likely significant effect could not be ruled out on the basis that development could result in increased traffic congestion and air pollution and

in hydrological impacts on the European sites in the parish and surrounding areas. Note that an Appropriate Assessment has been completed, as discussed within the Cumulative Effects section.

- 5.79 Policy TOU1 is expected to have a mixed minor positive and minor negative effect in relation to SA objectives 6 and 7 because increased tourism could result in increased traffic congestion, air pollution and greenhouse gas emissions. However, the policy encourages sustainable travel and environmental stewardship in the long term.
- 5.80 Negligible effects are expected against all other SA objectives.

Table 5.9 SA scores for draft policy TOU1

SA Objectives	TOU1
SA1: Protect and enhance biodiversity and geodiversity within the Parish.	+/--?
SA2: Conserve and enhance the Parish's landscape and townscape.	+
SA3: Conserve and enhance the Parish's historic environment and cultural assets.	+
SA4: To maintain and improve the water quality of the Parish's waterbodies and groundwater, and to achieve sustainable water resources management.	0
SA5: Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.	0
SA6: Reduce air pollution and minimise traffic, particularly in Hailsham town centre.	+/-
SA7: Minimise greenhouse gas emissions in the Parish.	+/-
SA8: Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home.	0
SA9: Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness.	0
SA10: Facilitate improved health and wellbeing of the population including reducing inequalities in health.	+
SA11: Facilitate a sustainable and growing economy that enhances access to employment and business opportunities.	+

Air Quality and Renewables

Policy HAIL AQ1: Charging points for electric vehicles

- 5.81 Significant positive effects are expected in relation to SA objective 7 because the policy encourages the wide spread development of electric vehicle (EV) charging points where possible. Providing EV charging infrastructure supports the reduction of greenhouse gas emissions and air pollution within Hailsham. Additionally, providing infrastructure that can be expanded to provide additional charging station is included to enable future provision of EV charging points, encouraging long term use of electric vehicles and associated reduction of greenhouse gas emissions.
- 5.82 Policy AQ1 is expected to have a minor positive effect in relation to SA objective 2, because placement of EV charging points should take into consideration the quality of the townscape. In addition, by encouraging the use of electric vehicles and therefore reducing air pollution, this policy is expected to have minor positive effects on SA objectives 6 and 10 in relation to improving health and wellbeing and reducing air pollution.
- 5.83 Negligible effects are expected against all other SA objectives.

Policy HAIL AQ2: Sustainable design and construction

- 5.84 Significant positive effects are expected in relation to SA objective 5 because Policy AQ2 requires development to minimise the impact on flood risk.
- 5.85 Policy AQ2 is expected to have a minor positive effect in relation to SA objectives 6, 7 and 8 because it ensures high design standards that will contribute towards sustainable development. This is expected to include sustainable design and construction, resource efficiencies and climate change adaption measures and systems that reduce water consumption. The policy also encourages applications for development to work in accordance with the appropriate Building Regulations, such as BREEAM. BREEAM measures sustainable value in a series of categories from energy to ecology and addresses the most influential factors, including but not limited to, low impact design and carbon emissions reduction, design durability and resilience, adaption to climate change and ecological value and biodiversity protection. Therefore, this policy is expected to have minor positive effect on SA objectives 1, 4 and 10 in relation to protecting biodiversity, reducing water consumption and improving health and wellbeing. The policy also encourages housebuilders to register for assessment under the Home Quality Mark which could increase the level of housing quality, resulting in a positive effect on SA8. Additionally, Policy AQ2 encourages incorporating measures that promote renewable energy provision.
- 5.86 Negligible effects are expected against all other SA objectives.

Policy HAIL AQ3: High energy efficient buildings

- 5.87 Given the specific nature of this policy, the likely effects identified are mainly negligible for most of the SA objectives.
- 5.88 Policy AQ3 is likely to have a significant positive effect on SA objective 7 because the policy encourages proposed building development that has a net emission rate of zero or below.

Policy HAIL AQ4: Renewables

- 5.89 Significant positive effects with uncertainty are expected in relation to SA objective 7 because renewable and low carbon energy schemes are encouraged in appropriate locations.
- 5.90 Policy AQ4 is likely to have a mixed minor positive and minor negative effect with uncertainty in relation to SA objectives 2 and 3 because although the policy states that applications for renewable energy schemes will be required to demonstrate that they do not have a significant adverse effect on landscape, townscape character, biodiversity or heritage or cultural assets, installation of what is often large scale energy generation infrastructure could still cause minor harm to the area. However, renewable and low carbon energy schemes may not be large scale resulting in an uncertain effect.

- 5.91 Policy AQ4 is expected to have a minor positive effect on SA objective 1 because applications for renewable energy schemes are required to demonstrate that they will have no significant adverse effect on biodiversity. However, this minor positive effect will be mixed with a significant negative effect with uncertainty because the HRA screening identified that a likely significant effect could not be ruled out on the basis that development could result in increased traffic movements and air pollution and in hydrological impacts on the European sites in the parish and surrounding areas. Note that an Appropriate Assessment has been completed, as discussed within the Cumulative Effects section.
- 5.92 Negligible effects are expected against all other SA objectives.

Table 5.10 SA scores for draft policies AQ1 to AQ4

SA Objectives	AQ1	AQ2	AQ3	AQ4
SA1: Protect and enhance biodiversity and geodiversity within the Parish	0	+	0	+/--?
SA2: Conserve and enhance the Parish's landscape and townscape.	+	0	0	+/--?
SA3: Conserve and enhance the Parish's historic environment and cultural assets.	0	0	0	+/--?
SA4: To maintain and improve the water quality of the Parish's waterbodies and groundwater, and to achieve sustainable water resources management.	0	+	0	0
SA5: Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.	0	++	0	0
SA6: Reduce air pollution and minimise traffic, particularly in Hailsham town centre.	+	+	0	0
SA7: Minimise greenhouse gas emissions in the Parish.	++	+	++	++?
SA8: Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home.	0	+	0	0
SA9: Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness.	0	0	0	0
SA10: Facilitate improved health and	+	+	0	0

SA Objectives	AQ1	AQ2	AQ3	AQ4
wellbeing of the population including reducing inequalities in health.				
SA11: Facilitate a sustainable and growing economy that enhances access to employment and business opportunities.	0	0	0	0

The Growth of Hailsham

Policy HAIL SD1: Development frameworks

- 5.93 A significant positive effect is expected in relation to SA objective 2 because Policy SD1 encourages framework plans that respond to local character and context.
- 5.94 Policy SD1 is expected to have a minor positive effect in relation to SA objectives 3, 5, 6, 7, 9, and 10. This is because this policy encourages a movement plan that establishes sustainable transport measures and prioritises sustainable transport, a green infrastructure plan and a development, land use plan that shows the mix and type of development including health and education and a phasing delivery plan that requires supporting facilities to be provided at the right time. In addition, this policy includes that provision of waste water treatment and appropriate drainage is essential, therefore a minor positive effect is expected in relation to SA objective 4.
- 5.95 Policy SD1 is expected to have a significant positive uncertain effect on SA objective 1 because the policy encourages development frameworks that demonstrate a green infrastructure plan setting out the network and typology of green spaces, links and areas of ecological importance. However, the HRA screening identified that a likely significant effect could not be ruled out on the basis that development could result in increased traffic congestion and air pollution and in hydrological impacts on the European sites in the parish and surrounding areas. However, this policy looks to shape new development in a sustainable way and will not directly result in development, therefore it is uncertain how air pollution and hydrology at European sites could be affected. Note that an Appropriate Assessment has been completed, as discussed within the Cumulative Effects section.
- 5.96 Negligible effects are expected against all other SA objectives.

Policy HAIL SD2: Design principles

- 5.97 A significant positive effect is expected in relation to SA objective 2 because it requires that new development is addressed sensitively and is well designed in landscape terms.
- 5.98 Policy SD2 is expected to have a minor positive effect on SA objectives 6, 7, 8 and 10. This is because the policy encourages maximising the potential for walking and cycling to community facilities and ensures that a mix of housing types and styles are provided across the development site. The policy encourages the submission of a Building for Life 12 assessment which ensures homes are accessible, well-situated, adaptable, suitable for starter homes and for the elderly and has public and private spaces, therefore, the policy encourages safe and cohesive communities, which has positive implications for health and wellbeing.
- 5.99 Negligible effects are expected against all other SA objectives.

Policy HAIL SD3: Design codes and quality

- 5.100 Given the specific nature of this policy, the likely effects identified are mainly negligible for most of the SA objectives.
- 5.101 Policy SD3 is expected to have a minor positive effect on SA objectives 2 and 8 because it encourages the production of Design Codes for any major development proposal; therefore

development is more likely to incorporate good design that enhances the townscape and leads to high quality homes.

Table 5.11 SA scores for draft policies SD1 to SD3

SA Objectives	SD1	SD2	SD3
SA1: Protect and enhance biodiversity and geodiversity within the Parish	++?	0	0
SA2: Conserve and enhance the Parish's landscape and townscape.	++	++	+
SA3: Conserve and enhance the Parish's historic environment and cultural assets.	+	0	0
SA4: To maintain and improve the water quality of the Parish's waterbodies and groundwater, and to achieve sustainable water resources management.	+	0	0
SA5: Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.	+	0	0
SA6: Reduce air pollution and minimise traffic, particularly in Hailsham town centre.	+	+	0
SA7: Minimise greenhouse gas emissions in the Parish.	+	+	0
SA8: Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home.	0	+	+
SA9: Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness.	+	0	0
SA10: Facilitate improved health and wellbeing of the population including reducing inequalities in health.	+	+	0
SA11: Facilitate a sustainable and growing economy that enhances access to employment and business opportunities.	0	0	0

Hailsham Town Centre

Policy HAIL TC1: Hailsham town centre

- 5.102 Policy TC1 is expected to have a significant negative effect with uncertainty on SA objective 1 because the HRA screening identified that a likely significant effect could not be ruled out on the basis that development could result in increased traffic congestion and air pollution and in hydrological impacts on the European sites in the parish and surrounding areas. As such, a minor negative effect is also expected in relation to SA objective 4 (and 6 and 7 – see below). Note that an Appropriate Assessment has been completed, as discussed within the Cumulative Effects section.
- 5.103 A significant positive effect is likely in relation to SA objective 11 because the policy encourages development that will broaden the retail offer, enhancing the town's image as a destination for shopping and improve the range and quality of office and business accommodation, therefore facilitating a growing economy and enhancing employment and business opportunities.
- 5.104 A minor positive effect is likely in relation to SA objectives 2 and 10 because applications for town centre uses are subject to assessment of scale, character, location and the impact of proposed uses and applications for residential development are encouraged, particularly where they comprise part of a mixed-use scheme. In addition, this policy supports the promotion of more leisure, cultural and community facilities, adding to the vitality of the town centre, therefore improving community health and wellbeing.
- 5.105 Policy TC1 is expected to have a mixed minor positive and minor negative effect with uncertainty on SA objectives 6 and 7 because the policy requires new development to facilitate new and improved sustainable transport (pedestrian and cycle) routes, however it is likely that new development within the town centre will increase traffic congestion and air pollution.
- 5.106 Negligible effects are expected against all other SA objectives.

Policy HAIL TC2: Town centre design principles

- 5.107 Given the specific nature of this policy, the likely effects identified are mainly negligible for most of the SA objectives.
- 5.108 A significant positive effect is likely in relation to SA objective 2 because all proposed development is required to reflect best practice design principles, responding positively to the character and qualities of the town centre.
- 5.109 Policy TC2 is expected to have a minor positive effect on SA objective 3 because the policy encourages contributing positively to the high quality historic townscape of the conservation area. Additionally, opportunities for green walls are encouraged, therefore improving air pollution and minimising greenhouse gas emissions, this policy is expected to have minor positive effects on SA objectives 6 and 7.

Policy HAIL TC3: Town centre heritage assets

- 5.110 Given the specific nature of this policy, the likely effects identified are mainly negligible for most of the SA objectives.
- 5.111 Significant positive effects are expected in relation to SA objectives 2 and 3 as this policy encourages new development or improvements in the Town Centre to be undertaken with a view to preserve and enhance the ancient market town character including the conservation area and listed and locally listed buildings.
- 5.112 A minor positive effect is expected in relation to SA objective 7 because the policy encourages sensitive retrofitting and refurbishment of historic buildings for energy efficiency purposes, which could help reduce greenhouse gas emissions.

Policy HAIL TC4: Town centre car parking

- 5.113 Given the specific nature of this policy, the likely effects identified are mainly negligible for most of the SA objectives.

- 5.114 Policy TC4 is expected to have a significant negative effect with uncertainty on SA objective 1 because the HRA screening identified that a likely significant effect could not be ruled out on the basis that development could result in increased traffic congestion and air pollution and in hydrological impacts on the European sites in the parish and surrounding areas. However, this policy does not promote any development that would change the levels of water use; therefore it is uncertain how hydrology could be affected. Note that an Appropriate Assessment has been completed, as discussed within the Cumulative Effects section.
- 5.115 Minor negative effects are expected in relation to SA objectives 6 and 7 because the policy encourages development to consider the provision of public parking, which could encourage people to drive into the town centre; therefore leading to a potential increase in air pollution and greenhouse gas emissions.

Policy HAIL TC5: Shopfronts

- 5.116 Given the specific nature of this policy, the likely effects identified are mainly negligible for most of the SA objectives.
- 5.117 Significant positive effects are expected in relation to SA objectives 2 and 3 because the policy encourages proposals for new shopfronts and commercial properties to be well-designed, well-proportioned and enhance the character of the building, conversation area and the town centre as a whole.
- 5.118 Minor positive effects are expected in relation to SA objective 11 because improvements to the shopfronts and commercial properties of the town centre provides potential for more visitors coming to shop and increases the likelihood of businesses wanting to establish themselves in the area.

Policy HAIL TC6: Streets and spaces in the town centre

- 5.119 The HRA screening identified that a likely significant effect could not be ruled out on the basis that development could result in increased traffic congestion and air pollution and in hydrological impacts on the European sites in the parish and surrounding areas. However, negligible uncertain effects have been identified against SA objective 1 because this policy provides sustainable transport and enhances the quality of public realm within Hailsham. It is not expected to increase traffic movements and would not lead to development; therefore it is uncertain how effects on air pollution and hydrology could occur. Note that an Appropriate Assessment has been completed, as discussed within the Cumulative Effects section.
- 5.120 Significant positive are expected in relation to SA objectives 6 and 7 because the policy supports applications that provide a comfortable and safe environment for pedestrians and cyclists and improves access by public transport, therefore reducing air pollution and greenhouse gas emissions.
- 5.121 Significant positive effects are expected in relation to SA objective 10 because the policy supports applications that provide a comfortable and safe environment for pedestrians and cyclists, therefore improving health and wellbeing of the community.
- 5.122 Minor positive effects are expected in relation to SA objective 3, because the policy encourages the placing of tables and chairs in the street if it does not harm the character of the conservation area.
- 5.123 Negligible effects are expected against all other SA objectives.

Table 5.12 SA scores for the draft policies TC1 to TC6

SA Objectives	TC1	TC2	TC3	TC4	TC5	TC6
SA1: Protect and enhance biodiversity and geodiversity within the Parish	--?	0	0	--?	0	0?
SA2: Conserve and enhance the Parish's landscape and townscape.	+	++	++	0	++	0
SA3: Conserve and enhance the Parish's historic environment and cultural assets.	0	+	++	0	++	+
SA4: To maintain and improve the water quality of the Parish's waterbodies and groundwater, and to achieve sustainable water resources management.	-	0	0	0	0	0
SA5: Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.	0	0	0	0	0	0
SA6: Reduce air pollution and minimise traffic, particularly in Hailsham town centre.	+/-	+	0	-	0	++
SA7: Minimise greenhouse gas emissions in the Parish.	+/-	+	+	-	0	++
SA8: Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home.	0	0	0	0	0	0
SA9: Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness.	0	0	0	0	0	0
SA10: Facilitate improved health and wellbeing of the population including reducing inequalities in health.	+	0	0	0	0	++
SA11: Facilitate a sustainable and growing economy that enhances access to employment and business opportunities.	++	0	0	0	+	0

Community Infrastructure Levy

Policy HAIL P1: Community infrastructure levy

- 5.124 Significant positive effects with uncertainty are expected in relation to SA objectives 1, 2, 6, 7, 10 and 11. This policy will direct money from development into a number of projects, namely AT1, GS1, TC1 and TC2 which relate respectively to implementing active travel projects, enhancing natural and amenity greenspace, enhancing town centre shop fronts and branding, and enhancing town centre and public realm. Project AT1 will help to provide sustainable transport links thereby helping to create a healthy living environment, improve access to jobs and reduce air pollution and minimise greenhouse gas emission by reducing reliance on private car. Project GS1 seeks to improve the quality of all existing amenity and natural green spaces across the Neighbourhood Plan area enhance underused green spaces and roadside verges for biodiversity thereby helping to enhance habitats and species within the parish. Projects TC1 and TC2 would also help to improve Hailsham's living environment and help to enhance Hailsham's townscape and landscape.
- 5.125 Significant positive effects are expected for this policy are uncertain as there is a chance that projects outlined within the Neighbourhood Plan are not delivered exactly as described or CIL funding is directed into other areas determined by Wealden District Council.
- 5.126 Negligible effects are expected against all other SA objectives.

Table 5.13 SA scores for draft policy P1

SA Objectives	P1
SA1: Protect and enhance biodiversity and geodiversity within the Parish.	++
SA2: Conserve and enhance the Parish's landscape and townscape.	++?
SA3: Conserve and enhance the Parish's historic environment and cultural assets.	0
SA4: To maintain and improve the water quality of the Parish's waterbodies and groundwater, and to achieve sustainable water resources management.	0
SA5: Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.	0
SA6: Reduce air pollution and minimise traffic, particularly in Hailsham town centre.	++?
SA7: Minimise greenhouse gas emissions in the Parish.	++?
SA8: Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home.	0
SA9: Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness.	0

SA Objectives	P1
SA10: Facilitate improved health and wellbeing of the population including reducing inequalities in health.	++?
SA11: Facilitate a sustainable and growing economy that enhances access to employment and business opportunities.	++?

Cumulative Effects

5.127 **Table 5.14** presents a summary of the scores for all the policies set out in the Neighbourhood Plan. This section presents an assessment of the likely significant effects of the NDP as a whole, in relation to the likely future baseline i.e. an assessment of cumulative effects as required by the SEA Regulations.

SA Objective 1: Protect and enhance biodiversity and geodiversity within the Parish

- 5.128 Mixed effects were recorded for this SA objective. Significant negative uncertain effects were recorded where the HRA screening identified that a likely significant effect could not be ruled out on the basis that development could result in increased traffic congestion and air pollution, recreational pressures and hydrological impacts on the European sites in the parish and surrounding areas. However, an Appropriate Assessment has been completed, which concluded that the NDP will not adversely affect the integrity of the European sites due to the inclusion of the Policy HRA1 and relevant policies within the submission version of the Wealden Local Plan (Policy AF1, AF2, SWGA7 and SWGA8). Therefore, no significant negative effects are expected when the plan is considered as a whole, and alongside the emerging Wealden Local Plan.
- 5.129 Some policies are expected to have minor or significant positive effects with uncertainty in relation to this objective, as they require protection and/or enhancement of biodiversity features. Policy HRA1 protects against significant adverse effects on designated European sites, notably the Ashdown Forest Special Area of Conservation (SAC) and Special Protection Area (SPA); the Pevensy Levels Ramsar Site and SAC and Lewes Downs SAC, thereby helping to protect biodiversity by preserving the ecological integrity of these sites. Additionally, any proposals for development must be accompanied by information to allow an HRA of the development to be completed; thereby ensuring development does not adversely affect the sites. This policy could work in tandem with Policy AQ2 and P1 to have an overall positive effect as they enhance habitats and protect biodiversity. In addition, Policy GS1 supports proposals that create new wildlife habitats, connect, enhance and retain existing wildlife habitats.
- 5.130 The plan does not directly propose development. Where policies support development, this is likely to be small-scale and located within existing urban areas or existing development sites. Considering this and the biodiversity protections within policies such as HRA1, **cumulative minor positive effects** are expected with regards to SA objective 1.

SA Objective 2: Conserve and enhance the Parish's landscape and townscape

- 5.131 The majority of policies are expected to have minor or significant positive effects in relation to this objective. Policy D1 encourages development that implements green walls, roofs and SUDs, as well as adopt designs that respond to the surrounding townscape and landscape and display a high level of architectural quality which responds positively to local context. This policy could work in tandem with Policies SD1 and TC2 to have an overall positive effect, as they promote the use of best practice design principles that respond positive to the character and qualities of the town centre.

- 5.132 One policy (AQ4) is expected to have a mixed minor positive and minor negative effect with uncertainty on this objective. The policy states that applications for renewable energy schemes will be required to demonstrate that they do not have a significant adverse effect on landscape and townscape character, installation of what is often large scale energy generation infrastructure could still cause minor harm to the area. However, renewable and low carbon energy schemes may not be large scale resulting in an uncertain effect.
- 5.133 The rest of the policies are expected have a negligible effect.
- 5.134 As such, **cumulative significant positive effects** are expected with regards to SA objective 2.

SA Objective 3: Conserve and enhance the Parish's historic environment and cultural assets

- 5.135 The majority of policies are expected to have a negligible effect on this objective.
- 5.136 Most of the remaining policies are expected to have a minor or significant positive effect on this objective. Policies TC3 and TC5 are likely to work in combination to ensure that developments undertaken in the Town Centre will preserve and enhance the ancient market town character including the conservation area and listed and locally listed buildings.
- 5.137 Policy AQ4 is the only policy that is likely to have a mixed minor positive and minor negative effect on this objective. The policy states that applications for renewable energy schemes will be required to demonstrate that they do not have a significant adverse effect on heritage or cultural assets, installation of what is often large scale energy generation infrastructure could still cause minor harm to the area. However, renewable and low carbon energy schemes may not be large scale resulting in an uncertain effect.
- 5.138 As such, **cumulative minor positive effects** are expected.

SA Objective 4: To maintain and improve the water quality of the Parish's waterbodies and groundwater, and to achieve sustainable water resources management

- 5.139 The majority of policies are expected to have a negligible effect on this objective.
- 5.140 Five policies are expected to have a minor or significant positive effect on this objective. Policies HRA1 and GS1 are likely to work in combination to reduce the likelihood of development having an adverse effect on water quality and encourage the use of SUDs which could help to conserve and enhance water quality and reduce the risk flooding by reducing the risk of surface water runoff.
- 5.141 Four policies are expected to have a minor negative effect on this objective. Any development, such as that which could come forward under Policies EMP1 and CF1, could have hydrological impacts as they could increase the area of impermeable surfaces in the parish. However, this is likely to be mitigated by policies that support provision of green infrastructure and SUDS, such as Policies D1, GS1 and GS3.
- 5.142 As such, **cumulative minor positive effects** are expected.

SA Objective 5: Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment

- 5.143 The majority of policies are expected to have a negligible effect on this objective.
- 5.144 Six policies are expected to have a minor or significant positive effect on this objective. Policies GS1 and AQ2 are likely to work in combination to minimise the impact on flood risk and encourage the use of SUDs which could help to conserve and enhance water quality and reduce the risk flooding by reducing the risk of surface water runoff.
- 5.145 As such, **cumulative minor positive effects** are expected.

SA Objective 6: Reduce air pollution and minimise traffic, particularly in Hailsham town centre

- 5.146 Over half of the policies are expected to have a minor or significant positive effect on this objective (some as part of a mixed effect). Policies AT1 to AT3 are likely to work in combination

to encourage active and sustainable travel through promoting delivery of walking and cycling routes that reduce reliance on vehicular movements. As such, these policies will help to promote sustainable transport links thereby minimising traffic congestion and associated air pollution.

- 5.147 Six policies are expected to have a mixed minor positive and negative effect on this objective. These have potential to increase traffic congestion and air pollution within Hailsham; however they also encourage the use of sustainable modes of transport or electric vehicle infrastructure.
- 5.148 Policies TC4 and D2 are expected to have a minor negative effect on this objective. This is because the policy encourages development to consider the provision of public parking, which may encourage residents to travel by car, thereby increasing the likelihood of air pollution from vehicular emissions.
- 5.149 Given the strong emphasis of the plan on the provision of sustainable transport, **cumulative minor positive effects** are expected.

SA Objective 7: Minimise greenhouse gas emissions in the Parish

- 5.150 The majority of policies are expected to have a minor or significant positive effect on this objective (some as part of a mixed effect). Policies AT1 to AT3 are likely to work in combination to encourage sustainable and active travel through delivery of walking and cycling routes that reduce reliance on vehicular movements. As such, these policies will help to promote sustainable transport links thereby minimising greenhouse gas emissions from vehicles.
- 5.151 Five policies are expected to have a mixed minor positive and negative effect on this objective. These policies have the potential to increase greenhouse gas emissions within Hailsham; however they also encourage the use of sustainable modes of transport.
- 5.152 Policies TC4 and D2 are expected to have a minor negative effect on this objective. This is because the policy encourages development to provide of public parking, which may encourage residents to travel by car, thereby increasing the likelihood of emitting greenhouse gas emissions from vehicular transport.
- 5.153 The remaining policies are expected to have a negligible effect on this objective.
- 5.154 Given the strong emphasis of the plan on the provision of sustainable transport, **cumulative minor positive effects** are expected.

SA Objective 8: Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home

- 5.155 The majority of policies are expected to have a negligible effect on this objective.
- 5.156 Three policies are expected to have a minor positive effect on this objective. Policies D1, AQ2 and SD2 are likely to work in combination to encourage the use of sustainable features and increase the quality of housing development through ensuring development proposal undertakes the Building for Life 12 Assessment and the Home Quality Mark Assessment.
- 5.157 As such, **cumulative minor positive effects** are expected.

SA Objective 9: Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness

- 5.158 The majority of policies are expected to have a negligible effect on this objective.
- 5.159 Three policies are expected to have a minor positive effect on this objective. Policies AT1 and AT3 encourage sustainable transport links, which may help residents with to access educational facilities. In addition, Policy SD1 requires developers to produce a land use plan that shows broad locations of supporting services, such as education.
- 5.160 Policies EMP1 and CF1 are expected to have a significant positive effect on this objective. Policy EMP1 is likely to help to improve training and skills by supporting the provision local employment opportunities and policy CF1 supports the enhancement and provision of community facilities for education purposes.
- 5.161 As such, **cumulative minor positive effects** are expected.

SA Objective 10: Facilitate improved health and wellbeing of the population including reducing inequalities in health

- 5.162 The majority of policies are expected to have a minor or significant positive effect on this objective. Policies AT1 to AT2 are likely to work in combination to encourage active travel through delivery of walking and cycling routes. As such, these policies will help to promote physical activity and will contribute to minimising traffic, thereby improving health and wellbeing and providing a link to community and recreation facilities. These policies may help to ensure that key services and facilities, such as community facilities provided under Policy CF1, are accessible.
- 5.163 The remaining policies are expected to have a negligible effect on this objective.
- 5.164 As such, **cumulative significant positive effects** are expected.

SA Objective 11: Facilitate a sustainable and growing economy that enhances access to employment and business opportunities

- 5.165 The majority of policies are expected to have a negligible effect on this objective.
- 5.166 Eight policies are expected to have a minor or significant positive effect on this objective. In particular, Policy TC1 (Hailsham Town Centre) and Policy EMP1 (Providing for a mix of employment opportunities) are likely to work in combination to encourage development that will broaden the retail offer, enhance the town's image as a destination for shopping and improve the range and quality of office and business accommodation. Finally, Policy HRA1 requires all new development to have the ability to connect to high speed broadband, which allows residents to work from home and gives them increased access to search for employment opportunities, therefore facilitating a growing economy and increasing connectivity to employment and business opportunities.
- 5.167 As such, **cumulative minor positive effects** are expected.

Table 5.14 SA scores for All Submission Version Policies

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11
HRA1	++	+	0	+	+	+/-	+	0	0	+	+
D1	+	++	+	+	+	+	+	+	0	+	0
D2	+/--?	+	+	-	0	-	-	0	0	0	0
D3	0	++	0	0	0	0	0	0	0	0	0
D4	0	++	0	0	0	0	0	0	0	0	0
D5	+	++	0	0	0	0	+	0	0	0	0
AT1	0?	0	0	0	0	++	++	0	+	++	+
AT2	+/--?	+	0	0	0	+/-	+/-	0	0	++	0
AT3	0?	0	0	0	0	++	++	0	+	+	+
GS1	++?	+	0	++	++	+	+	0	0	++	0
GS2	+	+	0	0	0	0	0	0	0	++	0
GS3	++?	++	0	0	+	0	0	0	0	+	0
EMP1	--?	0	0	-	0	+/-	+/-	0	++	+	++
CF1	--?	0	0	-	0	+/-	+/-	0	++	++	0
TOU1	+/--?	+	+	0	0	+/-	+/-	0	0	+	+
AQ1	0	+	0	0	0	+	++	0	0	+	0
AQ2	+	0	0	+	++	+	+	+	0	+	0
AQ3	0	0	0	0	0	0	++	0	0	0	0
AQ4	+/--?	+/--?	+/--?	0	0	0	++?	0	0	0	0
SD1	++?	++	+	+	+	+	+	0	+	+	0
SD2	0	++	0	0	0	+	+	+	0	+	0
SD3	0	+	0	0	0	0	0	+	0	0	0
TC1	--?	+	0	-	0	+/-	+/-	0	0	+	++
TC2	0	++	+	0	0	+	+	0	0	0	0
TC3	0	++	++	0	0	0	+	0	0	0	0
TC4	--?	0	0	0	0	-	-	0	0	0	0

TC5	0	++	++	0	0	0	0	0	0	0	+
TC6	0?	0	+	0	0	++	++	0	0	++	0
P1	++	++?	0	0	0	++?	++?	0	0	++?	++?

Mitigation

5.168 As no residual adverse effects were identified, no additional mitigation measures are considered necessary.

6 Monitoring

- 6.1 The SEA Regulations require that *'the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action'* and that the environmental report should provide information on *'a description of the measures envisaged concerning monitoring'*.
- 6.2 National Planning Practice Guidance reiterates that monitoring should be focused on the significant environmental effects of implementing the Neighbourhood Plan; the reason for this is to enable identification of unforeseen adverse effects at an early stage and to enable appropriate remedial actions. It is best practice to expand this to include uncertain effects, as these could become significant.
- 6.3 No cumulative uncertain or significant negative effects have been identified, therefore no monitoring is required.

7 Conclusions

- 7.1 The Hailsham Neighbourhood Plan and the reasonable alternatives considered during its preparation, have been subject to a detailed appraisal against the SA objectives, which were developed at the scoping stage of the SA process.
- 7.2 In general, the plan is expected to have a wide range of negligible, minor positive and significant positive effects in relation to the SA objectives, although a number of potentially minor and significant negative impacts are also associated with previous HRA findings and when sustainable modes of transport will be implemented.
- 7.3 Overall, the Neighbourhood Plan is expected to have generally positive effects with regards to sustainability, particularly with regards to maintaining and improving the local townscape and the health and wellbeing of local people, as cumulative significant positive effects are expected with regards to the achievement of the following SA objectives:
- SA2: Conserve and enhance the Parish's landscape and townscape.
 - SA10: Facilitate improved health and wellbeing of the population including reducing inequalities in health.
- 7.4 The NDP is expected to avoid or mitigate all potentially significant negative effects and no residual negative effects were identified. While the NDP does not allocate sites and generally supports development that is likely to be small scale, there is potential for development to increase air pollution and greenhouse gas emissions and hydrological impacts, as identified in the HRA screening. However, an Appropriate Assessment has been carried out, which concluded that the NDP will not adversely affect the integrity of any European sites, largely due to the inclusion of the Policy HAIL HRA1 and relevant policies within the submission version of the Wealden Local Plan. As the main focus of the plan is to ensure that development that comes forward is well designed and contributes positively to the area, any potential adverse effects are expected to be sufficiently mitigated. Having the Neighbourhood Plan in place will help anticipate these effects and therefore provide an opportunity for early and effective mitigation measures to be put in place, which is unlikely to happen if the same level of development were to come forward without a plan in place.

Next Steps

- 7.5 To meet the requirements of the SEA Directive, this SA Report is being published for consultation alongside the Submission version of the Hailsham Neighbourhood Plan in spring 2019.

LUC

March 2019

Appendix 1

Consultation Responses to the SA Scoping Report and SA to accompany the draft NDP

Table A1.1 Consultation Responses to the SA Scoping Report and SA

Consultee Comment	Response/ how comment has been addressed
Historic England	
Historic England does not have any comments to make at this time.	Noted.
Natural England	
Natural England does not have any specific comments on the Scoping Report for the SA for the Hailsham Neighbourhood Plan.	Noted.
Environment Agency	
Supports inclusion of SA objectives 1, 4 and 5.	Noted.
Recommends that the SA takes account of relevant policies, plans and strategies including any local Strategic Flood Risk Assessment, flood risk strategies and the South East River Basin Management Plan.	Relevant international and national policies, plans and strategies are included in the review presented in Appendix 2 , in line with the requirements of the SEA Regulations. However, relevant information from these documents has been included in the baseline review in Appendix 3 , where relevant.

Appendix 2

Review of International and National Plans, Policies and Programmes

Table A2.1 Review of plans and programmes relevant to the preparation of the Hailsham Neighbourhood Plan and the SEA

Plan or programme	Key objectives relevant to the Local Plan and SA	Implications for the SA
INTERNATIONAL		
EU Directives		
<p><i>SEA Directive 2001</i> Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment</p>	<p>Provides for a high level of protection of the environment and contributes to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development.</p>	<p>Requirements of the SEA Directive must be met in Sustainability Appraisals.</p>
<p><i>Energy Performance of Buildings Directive 2010 on the energy performance of buildings 2010/31/EU</i></p>	<p>The Directive aims to promote the energy performance of buildings and building units. It requests that member states adopt either national or regional methodology for calculating energy performance and minimum requirements for energy performance.</p>	<p>Consider any measures to promote energy performance of buildings.</p>
<p><i>The Birds Directive 2009</i> Directive 2009/147/EC is a codified version of Directive 79/409/EEC as amended</p>	<p>Requires the preservation, maintenance, and re-establishment of biotopes and habitats to include the following measures:</p> <ul style="list-style-type: none"> • Creation of protected areas. • Upkeep and management in accordance with the ecological needs of habitats inside and outside the protected zones. • Re-establishment of destroyed biotopes. <p>Creation of biotopes.</p>	<p>Include sustainability objective / appraisal questions for the protection of biodiversity and take account of the HRA findings.</p>
<p><i>The Air Quality Directive 2008</i> Directive 2008/50/EC on ambient air quality and cleaner air for Europe</p>	<p>Avoid, prevent and reduce harmful effects of ambient noise pollution on human health and the environment.</p>	<p>Include sustainability objective / appraisal questions to maintain and enhance air quality.</p>

Plan or programme	Key objectives relevant to the Local Plan and SA	Implications for the SA
<p><i>The Floods Directive 2007</i> Directive 2007/60/EC on the assessment and management of flood risks</p>	<p>Establishes a framework for the assessment and management of flood risks, aiming at the reduction of the adverse consequences for human health, the environment, cultural heritage and economic activity associated with floods.</p>	<p>Include sustainability objective / appraisal questions that relate to flood management and reduction of risk.</p>
<p><i>The Water Framework Directive 2000</i> Directive 2000/60/EC establishing a framework for community action in the field of water policy</p>	<p>Protection of inland surface waters, transitional waters, coastal waters and groundwaters.</p>	<p>Include sustainability objective / appraisal questions to protect and minimise the impact on water quality.</p>
<p><i>The Drinking Water Directive 1998</i> Directive 98/83/EC on the quality of water intended for human consumption</p>	<p>Protect human health from the adverse effects of any contamination of water intended for human consumption by ensuring that it is wholesome and clean.</p>	<p>Include sustainability objective / appraisal questions to protect and enhance water quality.</p>
<p><i>The Habitats Directive 1992</i> Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora</p>	<p>Promote the maintenance of biodiversity taking account of economic, social, cultural and regional requirements. Conservation of natural habitats and maintain landscape features of importance to wildlife and fauna.</p>	<p>Include sustainability objective / appraisal questions for the protection of biodiversity and take account of the HRA findings.</p>
<p>European plans and programmes</p>		
<p>EU Seventh Environment Action Programme (2014)</p>	<p>The EU's objectives in implementing the programme are:</p> <ul style="list-style-type: none"> (a) to protect, conserve and enhance the Union's natural capital; (b) to turn the Union into a resource-efficient, green and competitive low-carbon economy; (c) to safeguard the Union's citizens from environment-related pressures and risks to health and wellbeing; (d) to maximise the benefits of the Union's environment legislation by improving implementation; (e) to improve the knowledge and evidence base for Union environment policy; (f) to secure investment for environment and climate policy and address environmental externalities; (g) to improve environmental integration and policy coherence; 	<p>Include sustainability objectives / appraisal questions to protect and enhance the natural environment.</p>

Plan or programme	Key objectives relevant to the Local Plan and SA	Implications for the SA
	(h) to enhance the sustainability of the Union's cities; (i) to increase the Union's effectiveness in addressing international environmental and climate-related challenges.	
European Landscape Convention (Florence, 2002)	The convention promotes landscape protection, management and planning.	Include sustainability objective / appraisal questions to maintain and enhance landscape.
Johannesburg Declaration on Sustainable Development (2002)	Commitment to building a humane, equitable and caring global society aware of the need for human dignity for all. Renewable energy and energy efficiency. Accelerate shift towards sustainable consumption and production.	Consider a broad range of aspects of sustainability throughout the appraisal.
Aarhus Convention (1998)	Established a number of rights of the public with regard to the environment. Local authorities should provide for: The right of everyone to receive environmental information The right to participate from an early stage in environmental decision making The right to challenge in a court of law public decisions that have been made without respecting the two rights above or environmental law in general.	Ensure that public are involved and consulted at all relevant stages of SA production.
NATIONAL		
White Papers		
Energy White Paper: Our Energy Future (2003)	There are four key aims in this document: <ul style="list-style-type: none"> To put ourselves on a path to cut the United Kingdom carbon dioxide emissions- the main contributor to global warming- by some 60 % by about 2050, with real progress by 2020; To maintain the reliability of energy supplies; To promote competitive markets in the United Kingdom and beyond, helping to raise the rate of sustainable economic growth and to improve our productivity; and To make sure that every home is adequately and affordably heated.	Include a sustainability objective/ appraisal questions relating to energy efficiency.
Heritage Protection for the 21 st Century: White Paper (2007)	The proposals in this White Paper reflect the importance of the heritage protection system in preserving our heritage for people to enjoy now and in the future. They are based around three core principles: <ul style="list-style-type: none"> Developing a unified approach to the historic environment; Maximising opportunities for inclusion and involvement; and Supporting sustainable communities by putting the historic environment at the heart 	Include a sustainability objective / appraisal questions relating to cultural heritage.

Plan or programme	Key objectives relevant to the Local Plan and SA	Implications for the SA
	of an effective planning system	
<p>Natural Environment White Paper, 2011</p> <p><i>The Natural Choice: securing the value of nature</i></p>	<p>Protecting and improving our natural environment;</p> <p>Growing a green economy; and</p> <p>Reconnecting people and nature.</p>	<p>Promote enhancement of and access to the natural environment.</p>
<p>Electricity Market Reform White Paper 2011, <i>Planning our Electric Future: A White Paper for Secure, Affordable and Low-Carbon Electricity</i></p>	<p>This White Paper sets out the Government's commitment to transform the UK's electricity system to ensure that our future electricity supply is secure, low-carbon and affordable.</p>	<p>Include sustainability objective / appraisal questions to reduce carbon emissions and increase proportion of energy generated from renewable sources.</p>
<p>The Future of Transport White Paper 2004: A network for 2030</p>	<p>Ensure we can benefit from mobility and access while minimising the impact on other people and the environment, now and in the future.</p> <p>Get the best out of our transport system without damaging our overall quality of life.</p> <p>Develop strategies that recognise that demand for travel will increase in the future.</p> <p>Work towards a transport network that can meet the challenges of a growing economy and the increasing demand for travel but can also achieve the government's environmental objectives.</p>	<p>Include sustainability objective / appraisal questions to reduce the need to travel and improve choice and use of sustainable transport modes.</p>
<p>Water White Paper, 2011</p> <p><i>Water for Life</i></p>	<p>Objectives of the White Paper are to:</p> <ul style="list-style-type: none"> • Paint a clear vision of the future and create the conditions which enable the water sector and water users to prepare for it; • Deliver benefits across society through an ambitious agenda for improving water quality, working with local communities to make early improvements in the health of our rivers by reducing pollution and tackling unsustainable abstraction; • Keep short and longer term affordability for customers at the centre of decision making in the water sector; • Protect the interests of taxpayers in the policy decisions that we take; • Ensure a stable framework for the water sector which remains attractive to investors; • Stimulate cultural change in the water sector by removing barriers to competition, fostering innovation and efficiency, and encouraging new entrants to the market to help improve the range and quality of services offered to customers and cut 	<p>Include sustainability objective / appraisal questions that relate to water quality and quantity.</p>

Plan or programme	Key objectives relevant to the Local Plan and SA	Implications for the SA
	<p>business costs;</p> <ul style="list-style-type: none"> • Work with water companies, regulators and other stakeholders to build understanding of the impact personal choices have on the water environment, water resources and costs; and • Set out roles and responsibilities – including where Government will take a stronger role in strategic direction setting and assessing resilience to future challenges, as well as clear expectations on the regulators. 	
<p>Housing White Paper 2016, <i>Fixing our broken housing market</i></p>	<p>The White Paper sets out ways to address shortfall in affordable homes and boost housing supply. The White Paper focuses on the following:</p> <ul style="list-style-type: none"> • Planning for the right homes in the right places – Higher densities in appropriate areas, protecting the Green Belt while making more land available for housing by maximising the contribution from brownfield and surplus public land, regenerating estates, releasing more small and medium-sized sites, allowing rural communities to grow and making it easier to build new settlements • Building homes faster – Improved speed of planning cases, ensuring infrastructure is provided and supporting developers to build out more quickly. • Diversifying the Market – Backing small and medium-sized house builders, custom-build, institutional investors, new contractors, housing associations. • Helping people now – supporting home ownership and providing affordable housing for all types of people, including the most vulnerable 	<p>Include sustainability objectives/appraisals that relate to providing the right mix of housing available to those who need it.</p>
<p>Policies and strategies</p>		
<p>MHCLG (2018) National Planning Policy Framework</p>	<p>Presumption in favour of sustainable development.</p> <p>Achieving sustainable development by:</p> <p>Delivering a sufficient supply of homes.</p> <p>Building a strong, competitive economy.</p> <p>Ensuring vitality of town centres.</p> <p>Promoting healthy and safe communities.</p> <p>Promoting sustainable transport.</p> <p>Supporting high quality communications.</p> <p>Making effective use of land.</p> <p>Achieving well-designed places.</p>	<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>Include a sustainability objective / appraisal question relating to each of these topics, where they have been identified as relevant in the review of</p>

Plan or programme	Key objectives relevant to the Local Plan and SA	Implications for the SA
	Protecting Green Belt Land. Meeting the challenge of climate change, flooding, and coastal change. Conserving and enhancing the natural environment. Conserving and enhancing the historic environment. Facilitating the sustainable use of minerals.	baseline information.
National Planning Practice Guidance, DCLG	Provides further guidance to be read alongside the NPPF on a range of topics that link to the promotion of sustainable development including: <ul style="list-style-type: none"> • Air quality • Climate change • Conserving and enhancing the historic environment • Flood risk • Health and well being • Housing and economic development • Natural environment • Minerals • Rural housing • Open space • Transport • Waste Water supply, wastewater and water quality	The PPG sets out a range of social, economic and environmental considerations for the preparation of the Local Plan. It also includes information on undertaking sustainability appraisals which can be taken into consideration.
The Conservation of Habitats and Species Regulations 2017	The Regulations provide for the designation and protection of 'European sites', the protection of 'European protected species' and the adaptation of planning and other controls for the protection of European sites.	Include a sustainability objective / appraisal question regarding the protection of European sites and species and take account of the findings of the HRA.
DEFRA (2011) <i>Biodiversity 2020: A strategy for England's wildlife and ecosystem services</i>	The strategy aims to guide conservation efforts in England up to 2020, and move from a net biodiversity loss to gain. The strategy includes 22 priorities which include actions for the following sectors: <ul style="list-style-type: none"> • Agriculture; • Forestry; • Planning and Development; • Water Management; • Marine Management; • Fisheries; • Air Pollution; and 	Include sustainability objective / appraisal question that relates to biodiversity.

Plan or programme	Key objectives relevant to the Local Plan and SA	Implications for the SA
	Invasive Non-Native Species.	
DEFRA (2018) <i>A Green Future: Our 25 Year Plan to Improve the Environment</i>	Sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently.	Include sustainability objective / appraisal question that relates to the protection and enhancement of the natural environment.
UK Government Sustainable Development Strategy: <i>Securing the Future</i> (2005)	<p>The Strategy sets out 5 principles for sustainable development:</p> <ul style="list-style-type: none"> • Living within environmental limits; • Ensuring a strong, healthy and just society; • Achieving a sustainable economy; • Promoting good governance ; and • Using sound science responsibly. <p>The strategy sets four priorities for action:</p> <ul style="list-style-type: none"> • Sustainable consumption and production; • Climate change and energy; • Natural resource protection and environmental enhancement; • Sustainable communities <p>The strategy commits to:</p> <ul style="list-style-type: none"> • A programme of community engagement; • Forums to help people live sustainable lifestyles; • Open and innovative ways for stakeholders to influence decision; educating and training 	To ensure that the requirements of the Strategy are embedded within the SA framework.
The Carbon Plan: <i>Delivering our Local Carbon Future</i> (2011)	<p>The Carbon Plan sets out the government’s plans for achieving the emissions reductions it committed to in the first four carbon budgets.</p> <p>Emissions in the UK must, by law, be cut by at least 80% of 1990 by 2050. The UK was first to set its ambition in law and the Plan sets out progress to date.</p>	Include a sustainability objective relating to greenhouse gas emissions.
Department of Health (2010) <i>Healthy Lives, Healthy People: our Strategy for public health in England</i>	Protect the population from serious health threats; helping people live longer, healthier and more fulfilling lives; and improving the health of the poorest, fastest. Prioritise public health funding from within the overall NHS budget.	Include a sustainability objective / appraisal question relating to health and well-being.
The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: <i>Making the Country Resilient to a Changing Climate</i> (Defra, 2018)	<p>The report sets out visions for the following sectors:</p> <ul style="list-style-type: none"> • People and the Built Environment –“to promote the development of a healthy, equitable and resilient population, well placed to reduce the harmful health impacts of climate change...buildings and places (including built heritage) and the people who live and work in them are resilient and organisations in the built environment sector have an increased 	Include sustainability objectives / appraisal questions which seek to promote the implementation of adaptation measures to make the area more

Plan or programme	Key objectives relevant to the Local Plan and SA	Implications for the SA
	<p><i>capacity to address the risks and make the most of the opportunities of a changing climate."</i></p> <ul style="list-style-type: none"> • Infrastructure – <i>"an infrastructure network that is resilient to today's natural hazards and prepared for the future changing climate"</i>. • Natural Environment – <i>"the natural environment, with diverse and healthy ecosystems, is resilient to climate change, able to accommodate change and valued for the adaptation services it provides."</i> • Business and Industry – <i>"UK businesses are resilient to extreme weather and prepared for future risks and opportunities from climate change."</i> • Local Government – <i>"Local government plays a central in leading and supporting local places to become more resilient to a range of future risk and to be prepared for the opportunities from a changing climate."</i> 	resilient to a changing climate.
The National Flood and Coastal Erosion Risk Management Strategy for England (Environment Agency, 2011)	<p>This Strategy sets out the national framework for managing the risk of flooding and coastal erosion. It sets out the roles for risk management authorities and communities to help them understand their responsibilities.</p> <p>The strategic aims and objectives of the Strategy are to:</p> <ul style="list-style-type: none"> • <i>"manage the risk to people and their property;</i> • <i>Facilitate decision-making and action at the appropriate level – individual, community or local authority, river catchment, coastal cell or national;</i> <p><i>Achieve environmental, social and economic benefits, consistent with the principles of sustainable development"</i>.</p>	The SA framework should include sustainability objectives / appraisal questions which seek to reduce the risk and manage flooding sustainably.
Future Water: The Government's Water Strategy for England (DEFRA, 2008)	<p>Sets out how the Government want the water sector to look by 2030 and an outline of the steps which need to be taken to get there.</p> <p>The vision for 2030 is one where we, as a country have:</p> <ul style="list-style-type: none"> • <i>"improved the quality of our water environment and the ecology it supports, and continue to maintain high standards of drinking water quality from taps;</i> • <i>Sustainably managed risks from flooding and coastal erosion, with greater understanding and more effective management of surface water;</i> • <i>Ensure a sustainable use of water resources, and implement fair, affordable and cost-reflective water charges;</i> • <i>Cut greenhouse gas emissions; and</i> <p><i>Embed continuous adaptation to climate change and other pressures across the water industry and water users"</i>.</p>	Include sustainability objectives / appraisal questions which seek to protect, manage and enhance the water environment.
DEFRA (2007) <i>The Air Quality Strategy for England, Scotland, Wales and Northern Ireland. 1</i>	The Air Quality Strategy sets out a way forward for work and planning on air quality issues by setting out the air quality standards and objectives to be achieved. It introduces a new policy framework for tackling fine particles, and identifies potential new national policy measures	Include a sustainability objective relating to air quality.

Plan or programme	Key objectives relevant to the Local Plan and SA	Implications for the SA
	<p>which modelling indicates could give further health benefits and move closer towards meeting the Strategy's objectives. The objectives of strategy are to:</p> <ul style="list-style-type: none"> • Further improve air quality in the UK from today and long term. <p>Provide benefits to health, quality of life and the environment.</p>	
Working with the grain of nature – A Biodiversity Strategy for England (2011))	This Strategy seeks to protect and improve the rural, urban, marine and global environment and lead on the integration of these with other policies across Government and internationally.	Include a sustainability objective relating to the protection and enhancement of biodiversity.
Legislation		
Housing and Planning Act (2016)	The Act makes widespread changes to housing policy at the national level. Measures introduced in the Act relate to starter homes, and permitting the sale of higher value local authority homes. Starter homes are the new affordable housing product designed by the government to specifically meet the housing needs of younger generations and to allow them to access home-ownership. The overarching aim of the Act is to promote home ownership and increase levels of house building.	Include a sustainability objective relating to the provision of an appropriate range of housing within the Plan area.
Localism Act (2011)	<p>The Localism Act introduces a number of measures to decentralise decision making process to the local level, creating space for Local Authorities to lead and innovate, and giving people the opportunity to take control of decisions that matter to them. The Localism Act includes a number of important packages.</p> <ul style="list-style-type: none"> • The new act makes it easier for local people to take over the amenities they love and keep them part of local life; • The act makes sure that local social enterprises, volunteers and community groups with a bright idea for improving local services get a chance to change how things are done. • The act places significantly more influence in the hands of local people over issues that make a big difference to their lives. • The act provides appropriate support and recognition to communities who welcome new development. • The act reduces red tape, making it easier for authorities to get on with the job of working with local people to draw up a vision for their area's future. • The act reinforces the democratic nature of the planning system passing power from bodies not directly to the public, to democratically accountable ministers. • The act enables Local Authorities to make their own decisions to adapt housing provision to local needs, and make the system fairer and more effective. • The act gives Local Authorities more control over the funding of social housing, helping them plan for the long- term. <p>In relation to planning, the Localism Act enables the Government to abolish regional spatial</p>	<p>To ensure the concepts of the Localism Act are embedded within the SA framework.</p> <p><i>Relates to the overall SA process.</i></p>

Plan or programme	Key objectives relevant to the Local Plan and SA	Implications for the SA
	strategies, introduce Neighbourhood Plans and Local Referendums.	
The Climate Change Act (2008)	<p>The Climate Change Act was passed in 2008 and established a framework to develop an economically credible emissions reduction path. It also strengthened the UK's leadership internationally by highlighting the role it would take in contributing to urgent collective action to tackle climate change under the Kyoto Protocol.</p> <p>The Climate Change Act includes the following:</p> <ul style="list-style-type: none"> • 2050 target. The act commits the UK to reducing emissions by at least 80% in 2050 from 1990 levels. This target was based on advice from the CCC report: Building a Low- carbon Economy. The 80% target includes GHG emissions from the devolved administrations, which currently accounts for around 20% of the UK's total emissions. <p>Carbon Budgets. The Act requires the Government to set legally binding 'carbon budgets'. A carbon budget is a cap on the amount of greenhouse gases emitted in the UK over a five-year period. The first four carbon budgets have been put into legislation and run up to 2027.</p>	Include a sustainability objective relating to climate change.
Energy Act (2008)	<p>The Act works towards a number of policy objectives including carbon emissions reduction, security of supply, and competitive energy markets. Objectives: Electricity from Renewable Sources: changes to Renewables Obligation (RO), designed to increase renewables generation, as well as the effectiveness of the RO.</p> <p>Feed in tariffs for small scale, low carbon generators of electricity. Smart meters: the Act mandates a roll-out of smart meters to medium sized businesses over the next five years.</p> <p>Renewable heat incentives: the establishment of a financial support mechanism for those generating heat from renewable sources.</p>	Include a sustainability objective relating to energy efficiency and climate change.
Flood and Water Management Act (2010)	The Act aims to reduce the flood risk associated with extreme weather. It 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.	The overview of flood risk management in England which is provided in the Act will need to be reflected in the Framework of the SA.
Town and country planning legislation	<p>A range of legislation published in 2017 is of relevance to the Local Plan. This includes:</p> <ul style="list-style-type: none"> - The Neighbourhood Planning Act 2017 – Act aims to strengthen neighbourhood planning by ensuring that planning decision- makers take account of well-advanced neighbourhood development plans and by giving these plans full legal effect at an earlier stage. - The Town and Country Planning (Brownfield Land Register) Regulations 2017 - The regulations require local authorities to prepare and maintain registers of brownfield land that is suitable for residential development. 	These provide background to the SA and Neighbourhood Planning process.

Plan or programme	Key objectives relevant to the Local Plan and SA	Implications for the SA
	<ul style="list-style-type: none"> - The Town and Country Planning (Permission in Principle) Order 2017 the Order provides that sites entered on Part 2 of the new brownfield registers will be granted permission in principle. <p>The regulations and order above aim to improve the quality and consistency of data held by local planning authorities, which will provide certainty for developers and communities, encouraging investment in local areas.</p>	
Planning (Listed Buildings & Conservation Areas) Act 1990	This Act details the requirements for listing buildings of special architectural or historic interest and identifying conservation areas. The Act details requirements for works to these or that may otherwise affect these. It aims to ensure that such requirements are enforced and to prevent deterioration of and damage to special buildings and areas.	Include a sustainability objective / appraisal questions relating to the historic environment.
Ancient Monuments & Archaeological Areas Act 1979	This Act makes provision for investigation, preservation and recording of matters of archaeological and historic interest, in particular ancient monuments and areas of archaeological importance and activities affecting these.	Include a sustainability objective/ appraisal questions relating ancient monuments and archaeological areas.

Appendix 3

Baseline Information

Housing

In 2011, the Office for National Statistics (ONS) recorded 8,700 houses within Hailsham Parish¹³. The minority of housing stock is flatted development (11.8%) with a relatively even split of detached and semi-detached dwellings (31% and 35% respectively).

Terraced housing represents some 20% of housing stock, which is higher than the District average. Caravans and temporary structures account for 2.1% of the housing stock, which is also higher than the District average.

Hailsham has a higher proportion of 1, 2 and 3 bedroom dwellings than the Wealden average. The proportion of 1 bedroom dwellings is lower than the South East average, 3 bedrooms are lower than the South East average, and 4 bedroom and 5+ bedroom dwellings are lower than both the Wealden and South East average. 5.3% of housing stock in Hailsham has one less room than required, but a higher than average proportion of housing stock in Hailsham has the appropriate number of rooms or more. The proportion of one person households in Hailsham is above the Wealden average, but below the South East average. In 2016, the lower quartile house price in Wealden was £230,000¹⁴.

The Wealden Objectively Assessed Need paper (2017) calculates Wealden's housing need figure as being 1,233 dwellings per annum (or 18,500 dwellings over 2013-28)¹⁵. The requirement for affordable housing in Wealden district is high at 331 affordable dwellings per annum.¹⁶

Education

In terms of the educational attainment of Hailsham's existing residents, 24.5% do not have qualifications, with 19% with Level 4 highest level of qualification. This is higher than for Wealden district as a whole, in which 19.9% of the population have no qualifications and 28.9% have Level 4 and above qualifications.

The Infrastructure Delivery Plan prepared in support of the emerging Wealden Local Plan sets out that in Hailsham, primary school places are expected to be in shortfall by 60 places in 2019/2020. However, the Infrastructure Delivery Plan proposes to expand Hailsham Community College and increase the age range to deal with this shortfall. In the longer term, a further 420 primary places are anticipated to be required in the 2020s.

The Infrastructure Delivery Plan suggests that Hailsham Community College will be able to maintain a steady intake of pupils until 2022/23, from which point more capacity is likely to be required.

The Neighbourhood Plan itself recognises that access to education beyond the parish is limited by a lack of public transport.

¹³ <https://www.nomisweb.co.uk/reports/localarea?compare=1170213711> [accessed 31.08.2018]

¹⁴ Information gathered from Emerging Wealden Local Plan

¹⁵ Regeneris (2017). Wealden OAN Update Draft Paper: 2013-2028. A Draft Report by Regeneris Consulting

¹⁶ Wealden District Local Plan: Proposed Submission

Population

Hailsham is located approximately 5 km north of Polegate and 15 km north of Eastbourne, which is the nearest large town. The town has a population of approximately 24,600¹⁷ people within an area of 1,937 hectares. The town has expanded significantly since 1945.

Hailsham is made up of several lower super output areas (LSOAs). Hailsham South and West (Wealden 016D) is in the 20% most deprived LSOAs with regard to multiple deprivation and also with regard to income deprivation, Barriers to Housing and Services, Income Deprivation Affecting Children. This LSOA is in the 10% most deprived for employment deprivation, education skills and training¹⁸. Some 13% of Wealden households are classified as being in fuel poverty. Cold, damp homes impact on the health of the young and elderly.

Hailsham East (Wealden 017B) is also in the 20% most deprived LSOAs with regard to multiple deprivation, including specifically for income deprivation, Barriers to Housing and Services, Income Deprivation Affecting Older People. This LSOA is also in the 10% most deprived for employment deprivation, education skills and training.

Hailsham South and West (Wealden 017D) is amongst the 30% most deprived LSOAs in the country, within the 20% most deprived LSOAs for employment deprivation, and within the 10% most deprived LSOAs for education skills and training.

Comparatively, Hailsham has less crime than other parts of England. Hailsham South and West (Wealden 016C) is one of the most 40% deprived LSOAs for the crime domain and is the worst performing in the parish.

In 2011, ethnic diversity within Hailsham (and Wealden) was significantly lower than that generally found in England and Wales, with 97.6% of persons being 'white', compared to an England and Wales average of 86%¹⁹.

Wealden has a higher than national average proportion of older residents (25.7% aged 65 and over estimated by ONS 2016; compared to 17.8% for the UK (ONS, 2015)). In 2011, 47.3% of the population was male, compared to 49.2% in England and Wales²⁰.

Health²¹

Life expectancy at birth for residents of Wealden is 81.7 years for males and 84.7 years for females. This is higher than the England averages (79.5 and 83.1 years) and slightly higher than averages for the South East region (80.6 and 84.0 years). However, life expectancy at birth in Hailsham (for both males and females combined) is lower than the national average, at least for Bethany House Surgery (76.6 years) and for Seaforth Farm Surgery (79.5 years)²². In 2012–2014, the absolute gap in life expectancy between the most and least deprived quintiles in Wealden was 3.2 years for males and 4.0 years for females. In both males and females circulatory diseases is the largest contributor to the gap (31% for males and 38% for females). Cancer contributes to a quarter of the gap for females (25%) and a fifth of the gap in males (19%). The risk increases for both these diseases for people who are overweight or obese.

The East Sussex Downs and Weald Primary Care Trust (ESD&W PCT) gives overviews of health for a number of 'localities'. The Hailsham Locality includes Hailsham and the surrounding area, including from Arlington in the west, to Boodle Street Green in the east. The Commentary for Hailsham Locality states that:

¹⁷ Draft Hailsham Neighbourhood Plan

¹⁸ Deprivation scores sourced from <http://dclqapps.communities.gov.uk/imd/idmap.html> [accessed 31.08.2018]

¹⁹ <http://eastsussexinfigures.org.uk/webview/welcome.html> [accessed 31.08.2018]

²⁰ <http://eastsussexinfigures.org.uk/webview/welcome.html> [accessed 31.08.2018]

²¹ Information gathered from Emerging Wealden Local Plan, East Sussex Downs and Weald PCT and Wealden Health and Wellbeing Strategy 2017: http://eastsussexjsna.org.uk/JsnaSiteAspx/media/jsna-media/documents/scorecards/2011_12/Commentaries/Loc_Hailsham.pdf [accessed 31.08.2018]

²² East Sussex Downs and Weald PCT (2012) Commentary for Hailsham Locality, Available at: http://eastsussexjsna.org.uk/JsnaSiteAspx/media/jsna-media/documents/scorecards/2011_12/Commentaries/Loc_Hailsham.pdf

- Some 17% of reception year children are overweight or obese and 30% of year 6 children are overweight or obese. In ESD&W PCT 1 in 4 (25%) adults are estimated to be obese.
- In ESD&W PCT it is estimated that 21% of adults smoke, including 19% of mothers smoking at time of delivery.
- All-age all-cause mortality (age standardised) is significantly²³ (9%) higher than expected compared to East Sussex. Bethany House Surgery has 86% higher mortality than expected, and it has the highest mortality of all practices in East Sussex. Seaforth Farm Surgery has significantly²⁴ (90%) higher mortality (age standardised) from chronic obstructive pulmonary disease than expected compared to East Sussex.

In 2011, 20.5% of persons were living with a limiting long term illness in Hailsham Parish, compared to an average of 17.5% in Wealden and 17.9% in England and Wales²⁵. In Wealden there are 7,052 patients aged 17 years and over on diabetes registers. Prevalence of diabetes is significantly higher in Hailsham than in East Sussex. There are 1,666 patients on dementia registers in Wealden. Hailsham Central & North is among one of the wards that see the highest number of emergency admissions for persons with dementia above the level that is expected.

The Wealden green infrastructure study (2017, Chris Blandford Associates) identifies that areas of accessible natural greenspace are present throughout Hailsham; however they are less concentrated in the northern part of the settlement. In terms of the Natural England access standards, much of the north and east of the town is not within 300 m buffer of accessible natural green spaces of 2 ha in size, and much of the north of the town is not within 2 km of accessible natural green spaces of 20 ha. Otherwise, the town meets the access standards for green spaces of 2 ha and 20ha, and the whole town is within an appropriate distance from spaces which are 100 ha or 500 ha in size.

There are a number of public rights of way which provide links to the east, specifically linking to the Pevensey Levels. A large area of accessible Natural Greenspace is located to the southwest of the town. Access trails including the national cycle network and wealdway give access north / south and north / west respectively.

The network of pedestrian routes is incomplete and the Cuckoo Trail is poorly integrated with the town centre, and offers a poor 'welcome'²⁶.

Air quality, noise and traffic

The structure of the road network in Hailsham focusses routes through the town centre, which can result in congestion at key junctions and relatively high volumes of traffic along North Street. Conflicts between pedestrians, cyclists and vehicles can occur in the town centre. The draft Neighbourhood Plan identifies safety concerns associated with the junction of the High Street and George Street, the junction of the High Street and Battle Road, and pedestrian crossing points on main routes into and around the town centre. Further correspondence with local councillors identified air pollution concerns at Vicarage Lane, Market Street, George Street, North Battle Road, London Road, South Road and the High Street and a concern that the new one way system is exacerbating these issues.

The Plan also identifies that the network of pedestrian routes is incomplete, and sets out that the Cuckoo Trail is poorly integrated with the town centre, and offers a poor 'welcome'. The route from the South Road car park and along North Street is also identified as suffering from high levels of traffic noise, which reduces the quality of the environment

There are no designated air quality management areas within Hailsham, or Wealden District.

²³ 95% confidence interval

²⁴ 95% confidence interval

²⁵ <http://eastsussexinfofigures.org.uk/webview/welcome.html> [accessed 31.08.2018]

²⁶ Hailsham Town Council (2018) Hailsham Neighbourhood Plan: Submission Version: April 2018

Economy

At 68.3% of the total population, the percentage of the parish population that is economically active is 0.2% higher than the county average²⁷, but remains lower than the regional and national averages (68.1% and 69.7% respectively²⁸). However, unemployment levels for Hailsham (3.3%) remain lower than regional and national averages (3.4% and 4.4% respectively).

According to the 2011 Census, the three main occupations are: skilled trade workers (16.5%), caring, leisure and other service occupations (12.6%) and professional occupations (12.3%).

Hailsham's largest employment industries are: wholesale and retail trade, and repair of motor vehicles and motorcycles (18.2%); human health and social work activities (16.0%) and construction (11.2%).

The general proportion of full-time to part-time jobs, at approximately 2:1, is in line with regional and national averages.

The district of Wealden, which includes Hailsham, has a total of 8,635 businesses; almost double that of the nearby boroughs of Eastbourne (3,445) and Hastings (3,075).

The district of Wealden, which includes Hailsham, has a gross weekly earnings of £182, which is close to the regional and national averages (£181 and £186 respectively).

Workforce projections for the district of Wealden show slowly increasing workforce numbers from 79,188 in 2018 to 83,715 in 2031. This aligns to neighbouring districts such as Rother, which also have slowly rising workforce projections during the 2018-2031 period²⁹.

Most retail is located in Hailsham town centre and the central Quintins Centre retail outlet.

2011 Census data shows that many Hailsham residents work within the parish, but others commute to nearby coastal towns such as Eastbourne and Brighton for work³⁰, although a smaller number travel further afield to the north.

Soils

The Agricultural Land Classification (ALC) system classifies agricultural land in five categories according to versatility and suitability for growing crops. Hailsham town is unclassified as 'urban' while the majority of the surrounding rural area within the Plan area is classified as Grade 3 (good to moderate quality agricultural land). It should be noted the specific subgrades of Grade 3 for this Plan area are unknown. Small areas to the north-west of the Plan area are classified as Grade 4 (poor quality agricultural land).

Soilscapes published by Cranfield University shows, in simple terms, what the likely soil conditions are at any point in the landscape by reference to one of 27 different broad types of soil. There are three main soil types within the Plan area. To the west around the Hailsham urban area is 'slowly permeable seasonally wet slightly acid but base-rich loamy and clayey' soil with 'moderate' fertility. In the east is 'Loamy and clayey soils of coastal flats with naturally high groundwater' also with 'moderate' fertility. An area to the south-east of the Hailsham urban area, as well as an area to the south towards Stone Cross contains 'slightly acid loamy and clayey soils with impeded drainage'. These areas have 'moderate to high fertility'.

²⁷ <http://eastsussexinfigures.org.uk/webview/index.jsp?catalog=http%3A%2F%2Fwww.eastsussexinfigures.org.uk%3A80%2Fobj%2FCatalog%2FCatalog54&submode=catalog&mode=documentation&top=yes>

²⁸ Economy Profile for Hailsham (Parish)- Wealden
<http://eastsussexinfigures.org.uk/webview/index.jsp?catalog=http%3A%2F%2Fwww.eastsussexinfigures.org.uk%3A80%2Fobj%2FCatalog%2FCatalog56&submode=catalog&mode=documentation&top=yes>

²⁹ ESCC Projections April 2018
<http://eastsussexinfigures.org.uk/webview/index.jsp?catalog=http%3A%2F%2Fwww.eastsussexinfigures.org.uk%3A80%2Fobj%2FCatalog%2FCatalog54&submode=catalog&mode=documentation&top=yes>

³⁰ Data Shine: Commute -
<http://commute.datashine.org.uk/#mode=allflows&direction=both&msoa=E02004417&zoom=11&lon=0.1593&lat=50.9212>

Water quality and resources

The Neighbourhood Plan area overlaps with the Cuckmere and Pevensy Levels catchments. Environment Agency data for the catchments show many of the rivers in the catchment area are classified as 'moderate' to 'poor' in terms of chemical, ecological and biological status along their lengths. Notable water bodies within the Neighbourhood Plan area include the Horse Eye Sewer (overall 'moderate' quality), Hurst Haven at Hailsham (overall 'moderate' quality), and Hurst Haven and Cuckmere between Arlington and Lower Horsebridge (overall 'poor' quality).

A range of human activities have the potential to pollute water e.g. industrial processes, runoff from agriculture, deliberate and accidental pollution incidents. Management of effluent discharge from Wastewater Treatment Works (WWTWs) such as those to the south-east of Hailsham are particularly important for the water quality in the Pevensy Levels. Southern Water has previously noted that based on forecast growth; there are capacity constraints on Hailsham South and Hailsham North WWTW due to the potential increase effluent discharge into the Pevensy Levels. In 2015, the preferred solution was to adopt new technologies that improve the quality of effluent discharge in order to accommodate growth without compromising the Pevensy Levels.

With regard to water resources, the Neighbourhood Plan is covered by the EA's Cuckmere & Pevensy Levels Catchment Abstraction Management Strategy (CAMS). Abstraction of surface water for public water supply is covered by two large licences, one filling Arlington Reservoir on the Cuckmere and the other at Hazards Green on the Wallers Haven. The CAMS notes the proposed development in the Stone Cross, Polegate and Hailsham areas will add to the pressure on resources, therefore making the best use of the water resource is important.

Climate change mitigation

There is widespread scientific consensus that the Earth's climate is changing and that human activity is the principal cause. The IPCC³¹ states that the warming of Earth's climate is unequivocal and since the 1950s, many of the observed changes are unprecedented over decades to millennia. Scientific forecasts suggest that the UK's climate will continue to get warmer and that the severity of weather systems over the UK will intensify³².

The design and construction of the built environment, including transport infrastructure, together with economic and social activities can have an effect on energy consumption and subsequent greenhouse gas emissions and this can be influenced by planning policies for both new and existing development.

Due to the scale and transboundary nature of climate change effects, assessing climate change impacts at the parish level is often not feasible. Where possible, district or county level data has been collected for Wealden and East Sussex.

The district of Wealden, which includes Hailsham, emitted 6.2 tonnes of carbon dioxide per capita in 2012, compared to 6.6 tonnes per capita for the neighbouring district of Rother, and 4.2 tonnes per capita in the neighbouring borough of Hastings.

The population of Wealden consumes larger amounts of domestic energy (gas and electricity) than the national average. In 2016, Wealden district consumed an average (mean) of 4,707 kWh of electricity, in comparison to the national average figure of 3,812 kWh. In addition, an average (mean) of 14,169 kWh of gas was consumed in Wealden in 2010, compared to the national average value of 13,077 kWh³³.

³¹ IPCC Climate Change 2014: Synthesis Report

³² IPCC Climate Change 2014: Synthesis Report

³³ East Sussex in Figures, Dataset: Gas and electricity consumption, 2005-2016 – districts. Available at:

http://www.eastsussexinfigures.org.uk/webview/index.jsp?headers=Fueltypes&Geogophysubset=E92000001%2CE12000008%2CE1000011%2CE07000061+-+E07000065&stubs=Geography&Sectorslice=Total&measure=common&virtuallslice=ConsumptionGwh_value&layers=Sector&study=http%3A%2F%2F10.128.25.249%3A80%2Fobj%2Fstudy%2F472&Fueltypessubset=All+fuels%2CBioenergy+and+wastes+-+Petroleum+products&mode=cube&Yearslice=2016&virtuallsubset=ConsumptionGwh_value&v=2&Yearsubset=2016&Sectorsubset=Total&measuretype=4&cube=http%3A%2F%2F10.128.25.249%3A80%2Fobj%2Fcube%2F472_C1&top=yes. Accessed: 19/10/18

East Sussex County Council (ESCC)³⁴ has an ongoing energy management programme which seeks to reduce carbon emissions within the county. ESCC projects undertaken in 2016-2017 focused on improving or upgrading: internal and external lighting fixtures, lost insulation, cavity wall insulation, boiler controls and undertaking energy awareness workshops.

In 2014, four solar energy schemes were approved in the Lower Weald. Despite this, Wealden has a relatively low number of operational renewable energy schemes within the district.

The Neighbourhood Plan itself notes that the parish does not have a train station and there is poor access via public transport to national train services at Polegate. As such, residents are likely to be reliant on the use of private vehicles (cars, vans, motorbikes etc.), which contribute to greenhouse gas emissions.

Climate change adaptation

Local Authorities are responsible for carrying out Strategic Flood Risk Assessments (SFRA) for their areas to determine the level of risk from river and coastal flooding, ground water and surface water flooding, including its interaction with the sewer network. The Environment Agency provides information and advice to assist in the production of FRA's and SFRAs and also produce Flood Zone maps for river and coastal flooding.

Areas to the north-west of Hailsham town centre, such as Splent Crescent and a section of Upper Horsebridge Road, and Diplocks Way in the centre of Hailsham town, include locations within Flood Zone 3, which are at high risk of flooding³⁵.

In 2010, some 27,611 properties were affected by localised flooding events in the county of East Sussex. This figure has risen by 568 properties from data collected in 2006³⁶.

The South East River Basin Management Plan (RBMP) notes that the significant water management issues within the area include: physical modifications, pollution from waste water, pollution from towns, cities and transport, changes to the natural flow and level of water, negative effects of invasive non-native species and pollution from rural areas. The RBMP also sets out priorities identified by local catchment partnerships. The catchment partnership for the Cuckmere and Pevensey Levels has identified management of floating pennywort, which threatens notified species of the Pevensey Levels Ramsar site and SSSI³⁷.

Wealden's Strategic Flood Risk Assessment identified that the current projection for sea level rise would push high tide levels over the top of existing defences at Pevensey. Therefore, the area at actual risk would increase if the Pevensey defences are not raised at the same rate as sea level. Raised flood defences are located at Pevensey, Hailsham, Westham, Polegate, Stone Cross and Uckfield. However, aside from the Pevensey defences, the design standard of each of these defences is low. In 2115, sea level rise is predicted to cause Flood Zone 3 to ingress a further 2 to 4 km into the Wealden District, covering all of the Pevensey Levels. As a result, the future Flood Zone 3 is predicted to encroach on the southern and western fringes of Hailsham. Hailsham is also expected to be affected by fluvial flooding, as its flood extents can increase by up to 40m³⁸.

Over 300 sites in Wealden are predicted to be at risk of surface water flooding in a 1 in 1,000-year event. The sites predicted to be at greatest risk from surface water are located in the south of Wealden, particularly in the area surrounding Hailsham. Over 200 of these sites partially fall

³⁴ East Sussex County Council: Annual Greenhouse Gas Emissions Report 2016-2017

file:///C:/Users/ielden_l/AppData/Local/Microsoft/Windows/INetCache/IE/G2ST60TC/greenhousegasreport2016-17.pdf

³⁵ Likelihood of Flooding in this Area - <https://flood-map-for-planning.service.gov.uk/confirm-location?eastng=558793.42&northing=110018.581&placeOrPostcode=hailsham>

³⁶ <http://eastsussexinfigures.org.uk/webview/index.jsp?catalog=http%3A%2F%2Fwww.eastsussexinfigures.org.uk%3A80%2Fobj%2FCatalog%2FCatalog54&submode=catalog&mode=documentation&top=yes>

³⁸ Wealden Strategic Flood Risk Assessment (June 2017)

http://www.wealden.gov.uk/Wealden/Residents/Planning_and_Building_Control/Planning_Policy/Evidence_Base/Planning_Evidence_Base_Flood_Risk_Assessment.aspx

within areas of groundwater concern. These are located in the south of Wealden, particularly in the area surrounding Hailsham³⁹.

Wealden's Green Infrastructure Study found that green infrastructure such as The Cuckoo Trail and an urban green grid for Hailsham may assist in adapting to climate change through innovative green infrastructure design solutions such as sustainable water management and urban cooling systems⁴⁰.

Biodiversity and geodiversity

There are a number of sites that are of international and national importance for nature conservation, which consist of Special Areas of Conservation (SAC), Special Protection Areas (SPA), Ramsar sites and Sites of Special Scientific Interest (SSSI), that lie within and in proximity to Hailsham. Pevensey Levels is in the east and south east part of Hailsham and extends beyond the parish to the east and south east. Dungeness, Romney Marsh and Rye Bay is located 13 km to the south east of Hailsham.

- Pevensey Levels (SSSI, SAC and Ramsar site) is a large wet grassland complex criss-crossed with freshwater ditches. Its SAC qualifying feature is a small freshwater snail, the little whirlpool ram's-horn snail (*Anisus vorticulus*). Current threats to the site are inappropriate water levels, invasive species, and water pollution from nutrient inputs.⁴¹
- Dungeness, Romney Marsh and Rye Bay (SPA) is a large area with a diverse coastal and marine landscape comprising a number of habitats. The site includes the largest and most diverse area of shingle beach in Britain, with low-lying hollows in the shingle providing nationally important saline lagoons, natural freshwater pits and basin fens.⁴²

There are three areas of Ancient Woodland within Hailsham. Coldthorn wood is to the south west of Hailsham and extends outside of the parish boundary to the south west. The second is Tile Hurst which is to the west of Hailsham and extends west outside of the parish boundary. Thirdly, Poultry Houses Shaw lies to the northwest of Hailsham. There are no National or Local Nature Reserves within Hailsham.

The area of the Parish to the east of the town is rural and consists primarily of coastal and floodplain grazing marsh, which is a priority habitat.

Historic environment

There are a number of heritage designations within Hailsham including 57 listed buildings (Grades I, II* and II) and one Scheduled Monument. The Plan highlights that there are 29 listed buildings of high quality in and around the town centre, including many along George Street, with the Church being an important local landmark. The scale and materials of many of the buildings reflect the local geology and generate local character. Much of the town centre is designated as a conservation area. While the town centre benefits from a fine grain historic high street, it is surrounded by larger scale retail and civic uses which contrast with the historic structure.⁴³ At present, there are no heritage assets at risk within Hailsham.⁴⁴

³⁹ Wealden Strategic Flood Risk Assessment (June 2017)

http://www.wealden.gov.uk/Wealden/Residents/Planning_and_Building_Control/Planning_Policy/Evidence_Base/Planning_Evidence_Base_Flood_Risk_Assessment.aspx

⁴⁰ Wealden Green Infrastructure Study (May 2017)

http://wealden.gov.uk/Wealden/Residents/Planning_and_Building_Control/Planning_Policy/Evidence_Base/Planning_Evidence_Base_Biodiversity_and_Green_Infrastructure.aspx

⁴¹ Natural England Site Improvement Plan <http://publications.naturalengland.org.uk/publication/6057793526169600>

⁴² Natural England Site Improvement Plan <http://publications.naturalengland.org.uk/publication/6291480347934720>

⁴³ Hailsham Neighbourhood Plan Submission Version, April 2018

⁴⁴ Historic England, Heritage at Risk Register, 2018

Landscape

The Plan area is covered by four character areas, as outlined in the Wealden Landscape and Settlement Character Assessment 2014. These are the Eastern Low Weald, Pevensey Levels, South Slope of High Weald, and Hailsham Character areas.

Eastern Low Weald is characterised by significant areas of flat, nearly treeless country. However, the large woodland area of Abbot's Woods is located to the east of the character area.

Pevensey Levels is a flat and open landscape characterised by reeds, drainage channels, grazing marsh scattered thorns and willows.

South Slope and high Weald is an intricate, small-scale landscape with a strong pattern of hedgerows, falling southward from the Heathfield to Battle ridge towards the Low Weald and Pevensey Levels. This landscape of gentle valleys and slopes affords good views of the Downs.

Hailsham is a nucleated settlement, which has growth around several north-south orientated corridors. Established as a market town in 1252, Hailsham retains its historic core. The town has grown considerably in the past century, with significant residential development occurring in the post-war years. More recently, house building has taken place on the western and southern edges of the town.

A patchwork of small-scale historic fields surrounds the settlement, often abutting the settlement edge. These are interspersed with large areas of Ancient Woodland, at the south-western edge of the town. The un-wooded ancient landscapes to the west of the settlement are cohesive, with a distinctive field pattern (aggregate assarts). To the north are scattered areas of regular and irregular piecemeal enclosure, and to the east, regular piecemeal enclosure and consolidated strip fields. Further to the east and south east (within the levels landscape), is a landscape of brooks innings and saltmarsh innings.

A number of culturally important landmarks are located within the settlement area, including Horselunges Manor complex to the north of the settlement and Michelham Priory to the west of the settlement.

The edge of Hailsham is predominantly surrounded by trees and woodland with a few pockets of exposed or prominent urban edges along the northern edges of the town.

The valley of the River Cuckmere is a key landscape feature, running to the north and west of the town. To the east of the settlement, the vast expanse of Pevensey Levels, with its associated drainage ditches is a key feature.

There are key views southward from the town towards Wilmington Wood.

A network of footpaths and bridleways connects Hailsham to its landscape setting, such as the Cuckoo Trail.

Appendix 4

Policy Development Audit Trail

Table A4.1 Comparison between Draft Emerging Policies and Submission Version Policies with justification for selecting

Policy in Draft Emerging Neighbourhood Plan (April 2017) or Consultation Statement (April 2018)	Policy in Submission Version Neighbourhood Plan (April 2018)	Justification for selecting policy
Vision and Objectives		
Draft Vision 1	Vision	The vision builds upon the issues identified through review of background material, the emerging Local Plan and feedback to the roadshow organised by the Town Council in June and July 2016. Two versions of the Vision were prepared for feedback at consultation in February 2017, after which a revised preferred vision statement was prepared, combining aspects of both. This was then subject to feedback at further consultation events in August 2017 and again between November 2017 and January 2018.
Draft Vision 2		
Draft Objectives	Objectives	As above. The objectives were identified through consultation and review of background issues / baseline evidence. Linked to this is the concept of the 'ten-minute town', which encapsulates the vision and objectives in an overarching principle promoting sustainable patterns of development. Strong support was expressed for this concept at consultation in August 2017 and later at the Regulation 14

Policy in Draft Emerging Neighbourhood Plan (April 2017) or Consultation Statement (April 2018)	Policy in Submission Version Neighbourhood Plan (April 2018)	Justification for selecting policy
		stage.
Growth Areas / Policies for Future Growth		
Draft Growth Areas Policy	Policy HAIL SD1: Development Frameworks	All three policies included in the Submission Version of the Neighbourhood Plan represent an evolution of the draft policies from April 2017, separating the three main themes out into separate policies for the purposes of clarity. These are included as it was recognised that Hailsham will be subject to major growth over the life of the Plan and that policies need putting in place to shape future development such that it reflects good practice, enhances the quality of place and creates cohesive communities, integrating existing neighbourhoods with new ones. Concern about the scale of growth, and the potential to influence this, was a driver for the Neighbourhood Plan, and was supported through consultation events and feedback.
	Policy HAIL SD2: Design Principles	As above
	Policy HAIL SD3: Design Codes and Quality	As above
Policies for Hailsham Town Centre		
Draft Town Centre Policy	Policy HAIL TC1: Hailsham Town Centre	Strengthening the town centre is a key objective of the Neighbourhood Plan, responding to consultation comments about the nature of the centre and evidence pointing to retail spend leaking from the town. This policy recognises that, with growth, a stronger town

Policy in Draft Emerging Neighbourhood Plan (April 2017) or Consultation Statement (April 2018)	Policy in Submission Version Neighbourhood Plan (April 2018)	Justification for selecting policy
		centre is required, providing a wider range and mix of retail and other supporting activities. It promotes the town centre as the civic heart and hub of the town, and establishes the types of uses that are considered appropriate. It encourages new residential development in the town centre, creating life and activity.
	Policy HAIL TC2: Town Centre Design Principles	This policy has been identified and included in response to wider comments made through consultation about the appearance of the town centre and recognition that new floorspace and development alone will not create the step-change required in the town centre, and that new development should contribute to a better sense and quality of place. It responds to analysis of the built form of the town centre, establishing design guidance that creates an attractive, active, safe public realm, with building heights and forms responding to the scale and character of the existing centre.
	Policy HAIL TC3: Town Centre Heritage Assets	This policy responds to the presence of the conservation area and listed buildings in the town centre which contribute to the character of Hailsham and which were noted through the consultation and background work as being important to preserve and enhance.
	Policy HAIL TC4: Town Centre Car Parking	This Policy responds to suggestions in the draft Local Plan as to potential areas for new development in the town centre, which include redevelopment of some of the car parks. It also responds to the urban design analysis of

Policy in Draft Emerging Neighbourhood Plan (April 2017) or Consultation Statement (April 2018)	Policy in Submission Version Neighbourhood Plan (April 2018)	Justification for selecting policy
		the town centre that shows that surface car parking is the major user of land in the town centre, that this could be provided in more effective ways, rationalising space for development and, at the same time, improving the quality of the public realm and retail experience. It also responds to surveys of car park use in the town centre.
	Policy HAIL TC5: Shopfronts	This policy was included because, despite Wealden having an adopted Design Guide SPD, the quality of shop fronts was identified through consultation, including that previously undertaken by Hailsham Forward in 2013, as undermining the quality and attractiveness of the town centre.
	Policy HAIL TC6: Streets and Spaces in the Town Centre	Public space is limited in Hailsham Town Centre, with the majority of the public realm given over to roads and highways space. The policy encourages improvements to the public realm, including the pedestrian and cycle network, such that the town centre can fulfil its role as the civic hub and place for life and social-interaction, which in turn will help encourage inward investment and retention of retail spending in Hailsham.
Town-wide / Neighbourhood Plan Area Policies – Design quality		
Draft Infill / Design / Character Area Policy	Policy HAIL D1: High Quality Design	The need for this policy was identified through early consultation events, with respondents stating that the quality of recent development should respond better to the character of

Policy in Draft Emerging Neighbourhood Plan (April 2017) or Consultation Statement (April 2018)	Policy in Submission Version Neighbourhood Plan (April 2018)	Justification for selecting policy
		<p>Hailsham and that, in the absence of up-to-date policies in the existing Development Plan, this promotes a higher standard of development in line with best practice. It responds to policy in the NPPF that allows design to be a reason for refusing planning permissions where applications do not accord with planning policy. in the absence of up-to-date adopted policy at the local authority level, this has been included in the Neighbourhood Plan to help deliver high quality design proposals.</p>
	<p>Policy HAIL D2: Small Scale Residential Development and Householder Extensions</p>	<p>This has been included in recognition that many small scale developments and extensions will come forward in the Plan area (particularly as more sites begin to be identified through the Brownfield Land Register) and that these should also respond positively to the character and quality of Hailsham. Inclusion of this as a separate policy also provides clarity for applicants and decision-takers that these applications also need to deliver a good quality of design.</p>
	<p>Policy HAIL D3: Innovation and Variety</p>	<p>This policy was identified and included in the Neighbourhood Plan to promote 'be-spoke' development solutions that respond to local character rather than representing off-the-shelf products. The identity and character of Hailsham was drawn out as a key issue through early consultation events and a separate character study prepared identifying positive features that should be responded to. The policy was supported through consultation.</p>

Policy in Draft Emerging Neighbourhood Plan (April 2017) or Consultation Statement (April 2018)	Policy in Submission Version Neighbourhood Plan (April 2018)	Justification for selecting policy
	Policy HAIL D4: Design for Self and Custom Build Homes	This policy was included in recognition that national agendas now promote facilitation and delivery of a wider range of housing products, with Local Authorities advertising and maintaining a Self-Build Register. The policy responds to this and creates a framework for this form of development, whilst also responding to the agenda for better design quality.
	Policy HAIL D5: Residential Car Parking Design	This was referenced in the draft policy from April 2017 and then separated and expanded upon in later versions, reflecting the importance that well designed residential parking has in terms of creating attractive places. The policy was supported through consultation events, with emphasis given to parking being provided in the right place such that it is properly used, avoiding informal parking that undermines the quality of space.
Town-wide / Neighbourhood Plan Area Policies – Other topics		
	Policy HAIL AT1: Active Travel	The policy flows from the concept of the ‘ten-minute town’ and the Plan objectives seeking to facilitate a shift in travel behaviour away from the private car, as well as enabling wider travel choices for all ages and members of society.
Town-Wide Policies: Cuckoo trail / green infrastructure	Policy HAIL AT2: The Cuckoo Trail	This policy is included as the Cuckoo Trail is a unique feature within Hailsham and where strong support has been expressed for improvements to be made to this, forming an attractive, safe and convenient walking and

Policy in Draft Emerging Neighbourhood Plan (April 2017) or Consultation Statement (April 2018)	Policy in Submission Version Neighbourhood Plan (April 2018)	Justification for selecting policy
		cycling route through Hailsham and connecting with surrounding areas. This forms a key spine through the town and improvements to it respond to emerging Walking and Cycling Strategies (at County and local level).
Town-Wide Policies: Public transport	Policy HAIL AT3: Public Transport	This policy was included in the Plan in response to consultation and review of evidence showing a need for improved connections between potential areas of growth and to nearby towns, particularly Polegate and Eastbourne, providing access to a wider range of facilities than provided for in Hailsham, including the railway station, Hospitals and College. The policy encourages space for public transport provision to be incorporated into new areas of growth, providing travel choice for all.
Town-Wide Policies: Community facilities	Policy HAIL CF1: Community Facilities	This policy recognises that with growth comes pressure on social and community infrastructure, and that new provision is required as part of 'good growth', creating cohesive communities. The Policy supports retention and improvement of existing facilities, as well as new provision within new growth areas.
Town-Wide Policies: Employment	Policy HAIL EMP1: Providing for a Mix of Employment Opportunities	The policy was introduced to support diversification and growth of the business sector in Hailsham, providing new employment opportunities, including small and start-up businesses, as identified through supporting evidence prepared for the emerging Local Plan and expressed through the 2016 residents

Policy in Draft Emerging Neighbourhood Plan (April 2017) or Consultation Statement (April 2018)	Policy in Submission Version Neighbourhood Plan (April 2018)	Justification for selecting policy
		survey. Provision of local employment opportunities also responds to the concept of the 'ten-minute town' providing scope for people to work close to home.
-	Policy HAIL HRA1: Habitat Regulations	This policy was specifically introduced upon the request and advice of Wealden District Council in recognition of the sensitive environments surrounding Hailsham and the ongoing status of supporting HRA work for the emerging Local Plan.
-	Policy HAIL GS1: Natural and Amenity Green Space	This policy reflects background studies and evidence (such as the Wealden Green Infrastructure Study) which shows there to be a lack of high quality, accessible green space in Hailsham. The policy reflects recommendations from the evidence base and comments expressed through consultation to enhance the network of green infrastructure across Hailsham. It aligns with the concept of the 'ten-minute town' providing for a mix of open space types in close proximity to the home.
-	Policy HAIL GS2: Open Space Within Major Development Areas	As Above
-	Policy HAIL GS3: Pevensey Levels	This policy was identified in response to the potential impact of growth on the setting of and proximity to the Pevensey Levels, which are integral to the local environment. It builds upon emerging growth areas identified in the emerging Local Plan and seeks to give a greater level of protection to the Pevensey Levels.

Policy in Draft Emerging Neighbourhood Plan (April 2017) or Consultation Statement (April 2018)	Policy in Submission Version Neighbourhood Plan (April 2018)	Justification for selecting policy
-	Policy HAIL TOU1: Tourism	This policy was identified in recognition of the setting of Hailsham and that it benefits from proximity to an attractive environment, leisure and recreation facilities, but that visits and associated expenditure could be better captured in the town.
-	Policy HAIL AQ1: Charging Point for Electric Vehicles	This, and the suite of 'Air Quality' policies (see below) were included in the Neighbourhood Plan in response to the climate change agenda, recognition that increased growth could lead to increased traffic and emissions, and that this will impact on the health and wellbeing of residents (background evidence suggests there is a lower proportion of people in good health in Hailsham than Wealden as a whole, and that the quality of air on the main roads through the centre of Hailsham is poor). The policy is consistent with advice from the County Highways department.
-	Policy HAIL AQ2: Sustainable Design and Construction	As above, the policy recognises the importance of adapting and responding to the climate change agenda, presenting more up-to-date policies than those in the currently adopted Development Plan.
-	Policy HAIL AQ3: High Energy Efficient Buildings	As above.
-	Policy HAIL AQ4: Renewables	As above.
-	Policy HAIL P1: Community Infrastructure Levy	A series of projects are identified in the Neighbourhood Plan which are not 'land-use and development' matters for policy but which

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		<p>are important for place-making purposes and delivery of sustainable development in Hailsham. The CIL policy identifies the priorities for directing monies received by the Local Authority. Identification of these also provides a basis for ongoing partnership working with the relevant organisations (e.g.: County Highways).</p>

Task	Timescale note	Officer	Date
Appropriate Assessment			
Draft Appropriate Assessment		NB	21st Feb
AA approved and send to TC and consultants		KS	28th Feb
Submission			
TC to submit NP to WDC (including SA/SEA)			by 29th March
WDC to check documents and issue decision letter	within 1 week of receipt of submission documents	EG	5th April
WDC and TC to agree dates for consultation, agree deposit points (max 5), agree leaflet/posters (TC/WDC to produce?)	within 1 week of issue of decision letter	EG	5th April
Consultation			
Print hard copies of documents for agreed deposit points and deliver to TC on Friday before commencement of consultation	By Friday before consultation starts	DC	w/c 29th April
Draft consultation form and guidance notes	By Friday before consultation starts	DC	w/c 29th April
Draft email to statutory consultees	By Friday before consultation starts	EG	w/c 29th April
Set up webpage for consultation (add all documents, rep form and guidance note)	By Friday before consultation starts	DC	by 3rd May
Send emails to statutory consultees & bodies referred to in consultation statement	On Friday before consultation starts	DC	3rd May
Make website live	On Friday before consultation starts	DC	3rd May
TC to publish consultation info and links (to WDC website) on their website	On Friday before consultation starts	EG	3rd May
WDC to publicise consultation; social media, MyAlerts and email statutory consultees	Day consultation starts	DC/EG	start 7th May
Complete consultation diary	Day consultation starts	DC	7th May
Consultation period	6 weeks		7th May to 18th June
Examination			
Contact NPIERS and examiners for availability of inspectors	first week of consultation period	EG	by 29th April
Send information on inspectors availability to TC and agree inspector	by the end of the consultation period	EG	by 29th April
Collate responses to consultation and examination documents	within 1 week of end of consultation period	EG/DC	w/c 24th June
Appoint inspector	within 6 weeks of the end of the consultation period	EG	w/c 24th June
Draft letter to inspector and send examination documents	within one week of the date of appointment	EG	w/c 24th June
Update the website	on the day of submission of documents to inspector	DC	w/c 24th June
Draft report and fact check			26th July
Final report			2nd August
Update the website			w/c 5th August
Post examination			
PFH report	within 3 weeks of receipt of final report		to Cllr Newton by 19th August
Decision and call in	3 weeks to include potential call in		23rd August
Decision statement issued	1 week after end of call in		13th September
Information Statement published	28 days prior to referendum (excl Sat/Sun and BH)		23rd Aug
Referendum	within 60 days of date decision statement published (excl Sat/Sun and BH)		by 6th December 5th Dec?

