

HAILSHAM TOWN COUNCIL

NEIGHBOURHOOD PLANNING COMMITTEE AGENDA

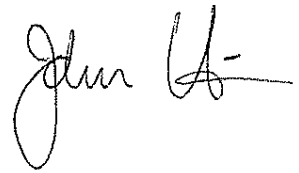
Notice is hereby given of

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

Thursday 13th December 2018 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. **Minutes of Previous Meeting**
To note & adopt or amend the minutes of the meeting of the Neighbourhood Planning Committee held on Thursday 7th June 2018.
5. **Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA)**
To receive an update on the SEA and HRA.
6. **Neighbourhood Plan Timetable**
To consider the amended timeline for the Hailsham Neighbourhood Plan
7. **Regulation 18 Consultation**
To discuss requirements for the Regulation 18 Consultation for the Neighbourhood Plan
8. **Financial Statement**
To note the financial statement of expenditure against budget for the project and discuss the budget if necessary

Dated 6th December 2018



JOHN HARRISON
Town Clerk

**Committee Membership;
Cllrs -**

Mary Laxton
Barbara Holbrook
Paul Holbrook
Frank Berry
Glenn Moore
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
Alex Willis
Richard Grocock

Grant De Jongh

Report to: Neighbourhood Planning Committee

Date: 13th December 2018

By: John Harrison, Town Clerk

Title of Report: Neighbourhood Plan Timetable

Purpose

To consider the amended timetable for the Neighbourhood Plan

Considerations

The overall timetable for the plan was last formally determined at the meeting on 7th September 2017. At that meeting the committee agreed that they were working towards the timetable under ‘Programme 3 Alternative Hybrid Programme’.

Text from report to NDPC 07/09/2017:

These are indicative timeframes and will need refinement upon appointment of SEA/ HRA consultants or successful Technical Support application. The ‘hybrid’ approach is recommended as the preferred programme: allowing the Town Council to proceed with consultation in November, though also commencing work on the HRA / SEA process without undue delay. This would also benefit from the advice of Wealden DC through their duty-to-support and consideration of how work on the Local Plan may, or may not, influence the HRA / SEA process for the neighbourhood plan.

Programme 1: Shows timeframe without need for SEA/HRA

	Sept	Oct	Nov	Dec	Jan
Review responses to consultation					
Amend and update current draft Plan					
Prepare consultation material					
Six-week consultation of draft Plan					

Programme 2: Full SEA / HRA process factored into the plan-making process

	Sept	Oct	Nov	Dec	Jan
Review responses to consultation					
Amend and update emerging policies					

Prepare and consult on SEA / HRA Screening						
Prepare and consult on SEA Scoping						
Prepare SEA and HRA for consultation						-> Feb
Amend and update neighbourhood plan						-> Feb
Prepare consultation material						-> March
Six-week consultation of draft Plan (& SEA/HRA)						-> April

Programme 3: Alternative 'hybrid' programme

	Sept	Oct	Nov	Dec	Jan
Review responses to consultation					
Amend and update current draft Plan					
Appoint Consultants / apply for Tech Support					
Prepare HRA screening and SEA Scoping					
Prepare consultation material					
Six-week consultation of draft Plan					
Consultation of HRA / SEA screening / scoping					

At the last meeting of the NDPC in June 2018, the Regulation 16 Consultation on the Neighbourhood Plan was delayed due to the "People Over Wind v Teoranta" case;

Text from the report as presented to the committee as below:

In the light of the ruling arising from the People Over Wind V Teoranta case, the decision to postpone the Regulation 16 consultation on Hailsham's Neighbourhood Plan has been made in order to prevent a further consultation being required once an SA/SEA is completed.

An SEA and SA will now be required and it will be necessary for HTC to commission this.

This will need to refer to WDC's appropriate assessment, which will be publicly available as of 27th June

WDC are working on a template for appropriate assessments which it will be necessary to complete and submit to WDC. This will be ready by approximately mid-July.

WDC Timescales:

<i>5th – 6th July</i>	<i>Committees to consider WDC's LP</i>
<i>18th July</i>	<i>Full WDC council to consider LP</i>
<i>End of Aug -Sept – beginning of Oct</i>	<i>8 week consultation period for WDC (subject to full council approval)</i>

HTC will need to let WDC know of its revised timescales for the NP once the SEA/SA is commissioned.

WDC will let the proposed examiner for HTC's Neighbourhood Plan of the changes in dates.

The committee **RESOLVED** to note the postponement of the Regulation 16 consultation period until the appropriate assessments have been undertaken. (Minute Ref NPC/18/01/7.4

A further update regarding the situation regarding the HEA/SRA was given to the committee (10th August 2018) as below:

Further to LUC's conversations with HTC/Troy Planning and Kelly at Wealden DC, there are various factors affecting LUC's commission to undertake the SA and HRA of the Hailsham NP, which we have agreed you should all be made aware of, as set out below.

1. Natural England have effectively said that Neighbourhood Plan HRAs cannot be completed until the HRA of the Local Plan is complete.
 - a. The Appropriate Assessment (a stage of HRA) for the Local Plan cannot be considered complete until Natural England have provided their comments on it
 - b. Natural England will endeavour to provide their comments on the Local Plan AA by the end of the consultation period in early October.
2. Nevertheless, It is understood that Wealden DC will go ahead with HRA and SA screening for the Hailsham NP in the meantime. The screening report will be subject to a five week consultation (we therefore expect this to end in early September). This will give some certainty as to whether appropriate assessment (AA) is required, but if AA is required it cannot be completed until after the Local

Plan AA is completed. In addition, the HRA/AA needs to feed into the SA, so the SA cannot be completed until the HRA is completed.

3. If AA is required for the NP, this will be carried out by Wealden DC. As such, this element of the work is to be removed from LUC's commission.
4. SEA/SA is only required if the NP is likely to lead to 'likely significant effects'. The purpose of screening (which is being undertaken by Wealden DC) is to determine whether this will occur. If AA is required, SEA/SA is also required. However, it is understood that Wealden DC are encouraging Neighbourhood Plan groups to undertake SA (whether or not the screening identifies potential for significant effects), as good practice to demonstrate how the plan contributes to sustainable development.

In summary:

LUC are no longer carrying out the HRA (because Wealden DC has said they are going to do the HRA).

The SA should take account of the HRA, therefore LUC cannot complete the SA until the HRA is complete. We will need both to submit with the Neighbourhood Plan anyway. However, this is only in terms of the final SA. LUC will press on with the SA scoping in the meantime, although they would like to wait to see the results of the SA screening first.

The overall timescales the SA for the NDP is largely dependent on the HRA. LUC can progress it to a certain point that means once the HRA has been carried out it should be fairly straightforward for them to finish off the SA. If they are able to programme this is ahead of time (i.e. they have some certainty about when we will have sight of the final HRA) they should be able to finish off the SA a couple of weeks after receiving the HRA (say, by the end of October).

In light of the advice from Wealden DC, LUC have proposed and we have agreed the following timetable for the SA work:

- Prepare the Scoping Report as far as they can in September, subject to tweaks once the final screening opinion is published (due no later than 20th September).
- Publish the Scoping Report for consultation w/c 24th September until w/c 29th October (this could end up slipping, depending on the extent to which the screening changes as a result of consultation comments).
- Prepare draft SA Report by end November (if the above slips this will also slip).

Note that there would be an element of risk that the Screening Report will not be subject to much change following consultation with the statutory bodies. In addition, the consultation may run over the Christmas period (although LUC appreciate final consultation is dependent on a range of factors outside the SA). The above timetable also assumes that the

HRA/Appropriate Assessment being prepared by Wealden DC will be available around mid-November.

The previous resolution was to commission LUC to carry out the work, and therefore this effective change of plan does not contravene any committee resolutions.

The committee now needs to revisit this programme in the light of the changes to the process as detailed above.

HTC have lodged the queries with WDC Regarding

- A. Progress on the HRA Report** (Our consultants have used the HRA screening to inform the SA, but of course the SA should take account of the Appropriate Assessment / full HRA as well. As such, it would be useful to have sight of this, at least in draft, before they can finish the draft SA Report).
- B.** Whether the status of the Local Plan which has progressed since we originally submitted our Draft NCP needs reflecting in the Basic Conditions and if so, whether a supplement to that would suffice?

Report to: Neighbourhood Planning Committee

Date: 22nd August 2018

By: John Harrison, Town Clerk

Title of Report: Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA)

PURPOSE

To receive an update on the SEA and HRA.

UPDATE

An indicative timetable is as follows:

- SA Scoping consultation: 9th November until 13th December
- Draft SA report: w/c 10th December
- Final SA Report, including responses to comments received from Scoping consultation: 21st December¹

The SEA scoping report has been forwarded onto the three Statutory consultees (Natural England, Historic England and the Environment Agency) for a five week consultation period, which started in November. To date, only Natural England has responded and stated it has no comments on the report.

The Scoping Report is subject to a statutory 5 week consultation period. However, to move things on a little quicker, we have started preparing the SA Report whilst the Scoping Report is out for consultation. If the scoping comments raise any significant issues, such as requiring change to the objectives etc., this will lead to additional time and costs of reworking our assessments, which we would seek to cover via an extension to the project budget. We would expect we will be able to produce a final report before Christmas.

The timetable is planned to get the final SA complete this side of Christmas. However, as explained previously, because we are preparing the SA ahead of receiving comments on the Scoping Report, there is a risk that comments received may mean we have to unpick parts of the report. In our experience, this is unusual, but if this is the case then finalising the SA Report may spill over into the New Year.

Please find attached the draft SA for the Hailsham Neighbourhood Plan. The document contains a couple of comments where we will need to make updates once the consultation on the SA Report has concluded.

¹ Note that in order to achieve this, LUC will need a collated set of comments on the draft report before Monday 17th December. This is also dependent on the number and nature of comments received from statutory consultees and HTC NPC.

If you have any comments or suggested changes, it would be easiest if you could send these through as comments and/or tracked changes, using the 'review' tab in Word. However, I'm happy to discuss alternative formats. As I imagine multiple people may review the report and want to comment on it, it would be helpful if you could co-ordinate these comments and send them through to us as a single, collated set of comments

It is noted that the document contains 31 policies and, if we take the emerging policies in the Emerging Draft Local Plan document as reasonable alternatives, seven alternatives. We have included these in our internal draft report. In the original submission, we noted the assumption that LUC's costs were based on the assessment of 20 to 25 policy options. As there are now 38 policy options, we request a budget extension to cover the assessment of the additional options.

The cost of the additional work would be **£741.83 + VAT**. This is based on the following:

1 day for consultant (Calum) @ £425.25 = £425.25
0.5 days for project manager (Sarah) @ £504 = £252
0.1 days for specialist review (Jon) @ £645.75 = £64.58
Total: £741.83

(Original budget for LUC's work = £11,664)

We are expecting to have the SA completed in draft this week (beginning 03/12/2018) (or if not early next beginning 10/12/2018). This will be sent to HTC NPC for review, but as mentioned before it cannot be finalised until we have received comments from the consultation on the Scoping Report (due to end 13th December).

Nothing as yet heard from Wealden DC regarding progress on the HRA Report – an update has been requested. We have used the HRA screening to inform the SA, but the SA should take account of the Appropriate Assessment / full HRA as well. As such, it would be useful to have sight of this, at least in draft, before we finish the draft SA Report. If the Appropriate Assessment raises additional points/issues that require revisions to the SA, this could also delay the production of the final SA into the New Year.



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Hailsham Neighbourhood Plan

Sustainability Appraisal Report (incorporating Strategic Environmental Assessment)

SA Report
Prepared by LUC
December 2018

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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Hailsham Neighbourhood Plan

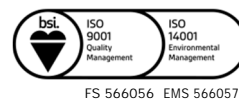
Sustainability Appraisal Report (incorporating Strategic Environmental Assessment)

SA Report
Prepared by LUC
December 2018

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Landscape Planning
Landscape Management
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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.

Context for the Hailsham Neighbourhood Plan

- 1.2 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.
- 1.3 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.
- 1.4 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.
- 1.5 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.
- 1.6 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** Error! Reference source not found. and **Appendix 3** of this report.

The Neighbourhood Plan

- 1.7 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.
- 1.8 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.
- 1.9 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

- 1.10 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.
- 1.11 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)

- 1.12 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.
- 1.13 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).'
- 1.14 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'*.
- 1.15 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.
- 1.16 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

- 1.17 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 Error! Reference source not found..
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 Error! Reference source not found..
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 2015.</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 early 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>

- 1.18 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.
- 1.19 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[SS1].

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 early 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 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. 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.

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,

3.14 **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 Local 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>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</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>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>
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</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</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

<p>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>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 Pevensy 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, wellbeing 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
---------------	--------

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

- 5.7 **Table 5.2.**
- 5.8 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
- 5.9 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.
- 5.10 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.
- 5.11 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
- 5.12 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.
- 5.13 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.
- 5.14 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.
- 5.15 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.
- 5.16 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.
- 5.17 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.

- 5.18 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.
- 5.19 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.
- 5.20 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

5.21 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.

Minor positive effects are expected in relation to SA objective 4. 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.

5.22 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.

5.23 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.	+
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.	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
SA10: Facilitate improved health and wellbeing of the population including reducing inequalities in health.	+

SA Objectives	HRA1
SA11: Facilitate a sustainable and growing economy that enhances access to employment and business opportunities.	0

Design Quality

Policy HAIL D1: High Quality Design

- 5.24 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.
- 5.25 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.
- 5.26 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.
- 5.27 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.
- 5.28 Negligible effects are expected against all other SA objectives.

Policy HAIL D2: Small scale residential development and householder extensions

- 5.29 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. An Appropriate Assessment is in the process of being completed, which will explore this issue in greater detail.
- 5.30 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).
- 5.31 Negligible effects are expected against all other SA objectives.

Policy HAIL D3: Innovation and Variety

- 5.32 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.

5.33 Negligible effects are expected against all other SA objectives.

Policy HAIL D4: Design for self and custom build homes

5.34 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.

5.35 Negligible effects are expected against all other SA objectives.

Policy HAIL D5: Residential Car Parking Design

5.36 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.

5.37 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.

5.38 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	+
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

SA Objectives	D1	D2	D3	D4	D5
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

- 5.39 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.
- 5.40 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.
- 5.41 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.
- 5.42 Negligible effects are expected against all other SA objectives.

Policy HAIL AT2: The Cuckoo Trail

- 5.43 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.

- 5.44 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.
- 5.45 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.
- 5.46 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.
- 5.47 Negligible effects are expected against all other SA objectives.

Policy HAIL AT3: Public transport

- 5.48 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. , .
- 5.49 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
- 5.50 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.
- 5.51 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?	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	0	0	0

SA Objectives	AT1	AT2	AT3
water resources management.			
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 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

- 5.52 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.
- 5.53 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.
- 5.54 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. An Appropriate Assessment is in the process of being completed, which will explore this issue in greater detail. 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.
- 5.55 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.

- 5.56 Negligible effects are expected against all remaining SA objectives.

Policy HAIL GS2: Open space within major development areas

- 5.57 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.
- 5.58 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.
- 5.59 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.
- 5.60 Negligible effects are expected for all remaining SA objectives.

Policy HAIL GS3: Pevensey Levels

- 5.61 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.
- 5.62 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. An Appropriate Assessment is in the process of being completed, which will explore this issue in greater detail. However, uncertainty has been identified against SA objective 1 because this policy provides green space that could to 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.
- 5.63 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.
- 5.64 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

- 5.65 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). An Appropriate Assessment is in the process of being completed, which will explore these issues in greater detail.
- 5.66 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.
- 5.67 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.
- 5.68 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.
- 5.69 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

- 5.70 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.
- 5.71 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). An Appropriate Assessment is in the process of being completed, which will explore this issue in greater detail.
- 5.72 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.
- 5.73 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

- 5.74 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.
- 5.75 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.
- 5.76 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. An Appropriate Assessment is in the process of being completed, which will explore this issue in greater detail.

- 5.77 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.
- 5.78 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

- 5.79 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.
- 5.80 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.
- 5.81 Negligible effects are expected against all other SA objectives.

Policy HAIL AQ2: Sustainable design and construction

- 5.82 Significant positive effects are expected in relation to SA objective 5 because Policy AQ2 requires development to minimise the impact on flood risk.
- 5.83 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.
- 5.84 Negligible effects are expected against all other SA objectives.

Policy HAIL AQ3: High energy efficient buildings

- 5.85 Given the specific nature of this policy, the likely effects identified are mainly negligible for most of the SA objectives.
- 5.86 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

- 5.87 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.
- 5.88 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.

- 5.89 Policy AQ4 is expected to have a minor positive effect on SA objective 1, 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 movements and air pollution and in hydrological impacts on the European sites in the parish and surrounding areas. An Appropriate Assessment is in the process of being completed, which will explore this issue in greater detail.
- 5.90 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 wellbeing of the population including reducing inequalities in health.	+	+	0	0

SA Objectives	AQ1	AQ2	AQ3	AQ4
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

- 5.91 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.
- 5.92 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.
- 5.93 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.
- 5.94 Negligible effects are expected against all other SA objectives.

Policy HAIL SD2: Design principles

- 5.95 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.
- 5.96 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.
- 5.97 Negligible effects are expected against all other SA objectives.

Policy HAIL SD3: Design codes and quality

- 5.98 Given the specific nature of this policy, the likely effects identified are mainly negligible for most of the SA objectives.
- 5.99 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

- 5.100 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). An Appropriate Assessment is in the process of being completed, which will explore this issue in greater detail.
- 5.101 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.
- 5.102 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.
- 5.103 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.
- 5.104 Negligible effects are expected against all other SA objectives.

Policy HAIL TC2: Town centre design principles

- 5.105 Given the specific nature of this policy, the likely effects identified are mainly negligible for most of the SA objectives.
- 5.106 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.
- 5.107 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

- 5.108 Given the specific nature of this policy, the likely effects identified are mainly negligible for most of the SA objectives.
- 5.109 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.
- 5.110 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

- 5.111 Given the specific nature of this policy, the likely effects identified are mainly negligible for most of the SA objectives.

- 5.112 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. An Appropriate Assessment is in the process of being completed, which will explore this issue in greater detail. 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.
- 5.113 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

- 5.114 Given the specific nature of this policy, the likely effects identified are mainly negligible for most of the SA objectives.
- 5.115 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.
- 5.116 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

- 5.117 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. An Appropriate Assessment is in the process of being completed, which will explore this issue in greater detail. 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.
- 5.118 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.
- 5.119 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.
- 5.120 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.
- 5.121 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

- 5.122 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.
- 5.123 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.
- 5.124 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

5.125 Error! Reference source not found. 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

- 5.126 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. An Appropriate Assessment is in the process of being completed, which will explore this issue in greater detail. However, these significant negative effects may be counteracted by many of the policies that encourage sustainable modes of transport, more green space and employing SUDS. There were some instances where the HRA screening identified likely significant effects on European sites, but given that the policies are not expected to increase traffic or lead to any development, these were scored negligible uncertain.
- 5.127 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. 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 policies that create new wildlife habitats, connect, enhance and retain existing wildlife habitats.
- 5.128 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 with uncertainty** are expected with regards to SA objective 1.

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

- 5.129 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.
- 5.130 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.

5.131 The rest of the policies are expected have a negligible effect.

5.132 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

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

5.134 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.

5.135 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.

5.136 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

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

5.138 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.

5.139 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.

5.140 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

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

5.142 Five 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.

5.143 As such, **cumulative minor positive effects** are expected.

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

5.144 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.

- 5.145 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.
- 5.146 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.
- 5.147 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

- 5.148 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.
- 5.149 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.
- 5.150 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.
- 5.151 The remaining policies are expected to have a negligible effect on this objective.
- 5.152 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

- 5.153 The majority of policies are expected to have a negligible effect on this objective.
- 5.154 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.
- 5.155 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

- 5.156 The majority of policies are expected to have a negligible effect on this objective.
- 5.157 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.
- 5.158 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.
- 5.159 As such, **cumulative minor positive effects** are expected.

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

- 5.160 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.
- 5.161 The remaining policies are expected to have a negligible effect on this objective.
- 5.162 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

- 5.163 The majority of policies are expected to have a negligible effect on this objective.
- 5.164 Seven 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.
- 5.165 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	0	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	++	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

- 5.166 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 Although national Planning Practice Guidance states that monitoring should be focused on the significant environmental effects of implementing the Neighbourhood Plan, the reasons for this is to enable identification of unforeseen adverse effects at an early stage and to enable appropriate remedial actions. It is recommended that effects on SA objective 1 (biodiversity) are monitored. This is because the cumulative positive effect identified is uncertain, due to the identification of likely significant effects in the HRA screening. As the Neighbourhood Plan is implemented and the likely significant effects become more certain, the Town Council may wish to widen or narrow down the monitoring framework to focus on those effects of the Neighbourhood Plan likely to be significantly adverse.
- 6.3 **Table 6.1** sets out a number of suggested indicators for monitoring the potential sustainability effects of implementing the Neighbourhood Plan. The data used for monitoring in many cases will be provided by the Local Authority and other outside bodies, for example the Natural England. It is therefore recommended that the Town Council remains in dialogue with Wealden District Council, statutory environmental consultees and other stakeholders and works with them to agree the relevant sustainability effects to be monitored and to obtain information that is appropriate, up to date and reliable.

Table 6.1 Proposed Monitoring Framework for Hailsham Neighbourhood Plan

SA objectives	Proposed monitoring indicators
1) Protect and enhance biodiversity and geodiversity within the Parish.	<ul style="list-style-type: none"> • Number, extent and condition of sites designated for nature conservation • Changes in areas of biodiversity importance • Percentage of SSSIs and local wildlife sites in favourable condition • Net increase in GI

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. As the main focus of the plan is to ensure that development that comes forward is well designed and contributes positively to the area, these are expected to be sufficiently mitigated, but there is some uncertainty with regard to residual effects on SA objective 1 (biodiversity) within the Parish. As such, it is recommended that effects of the plan on biodiversity assets is monitored. However, 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 early 2019.

LUC

December 2018

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	
Natural England	
Does not have any specific comments on the Scoping Report for the SA for the Hailsham Neighbourhood Plan.	Noted.
Environment Agency^[SS2]	

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>
Policies and strategies		
<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
	<p>Protecting Green Belt Land.</p> <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>baseline information.</p>
<p>National Planning Practice Guidance,</p> <p>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>DEFRA (2011) <i>Biodiversity 2020: A strategy for England's wildlife and ecosystem services</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 following sectors:</p> <ul style="list-style-type: none"> • Agriculture; • Forestry; • Planning and Development; • Water Management; • Marine Management; • Fisheries; • Air Pollution; and 	<p>Include sustainability objective / appraisal question that relates to biodiversity.</p>

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</i> . 1	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://dclgapps.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://eastsussexinfigures.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 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. 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 Pevensey 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 Pevensey 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 Pevensey Levels.

With regard to water resources, the Neighbourhood Plan is covered by the EA's Cuckmere & Pevensey 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&Geophysubset=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.

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 systems³⁷.

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.³⁸
- 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

³⁴ East Sussex County Council: Annual Greenhouse Gas Emissions Report 2016-2017
file:///C:/Users/ielden_I/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>

³⁷ 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

³⁸ Natural England Site Improvement Plan <http://publications.naturalengland.org.uk/publication/6057793526169600>

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.³⁹

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.⁴⁰ At present, there are no heritage assets at risk within Hailsham.⁴¹

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.

³⁹ Natural England Site Improvement Plan <http://publications.naturalengland.org.uk/publication/6291480347934720>

⁴⁰ Hailsham Neighbourhood Plan Submission Version, April 2018

⁴¹ Historic England, Heritage at Risk Register, 2018

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

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		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.

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-	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>

