Strategic Environmental Assessment for the Peacehaven and Telscombe Neighbourhood Plan

Scoping Report

Peacehaven and Telscombe Neighbourhood Plan Steering Group

October 2020

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Front cover image: Peacehaven Cliffs (image available from the 'Visit Lewes' website)

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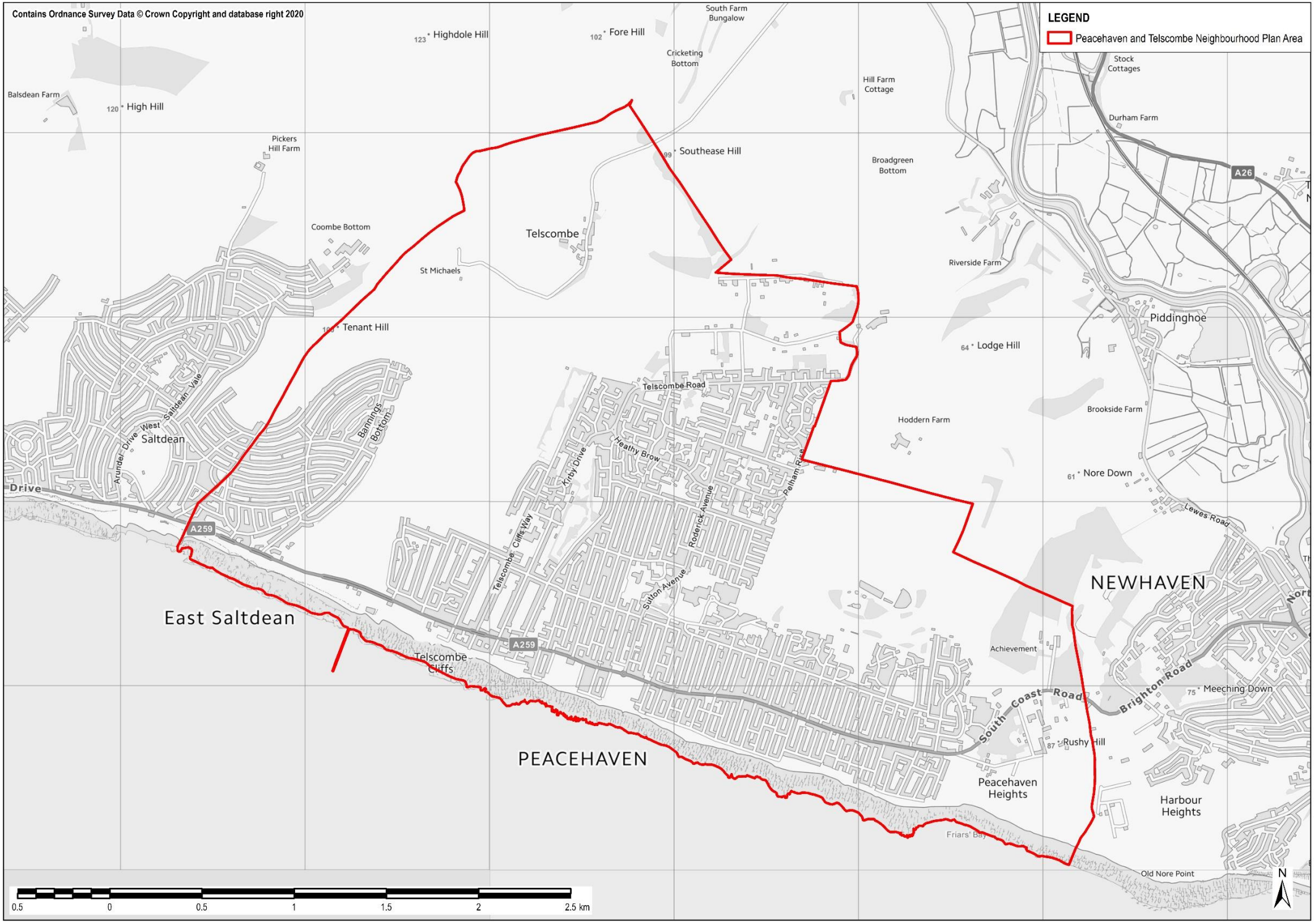

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1. Introduction

Background

1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment in support of Peacehaven and Telscombe's emerging Neighbourhood Plan.

1.2 The Peacehaven and Telscombe Neighbourhood Plan is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. The Neighbourhood Plan is being prepared in the context of the Lewes Local Plan, the key documents of which include the Lewes Core Strategy: Local Plan Part 1 (adopted in May 2016) and the Lewes Local Plan Part 2: Site Allocations and Development Management Policies (adopted in February 2020).

1.3 It is currently anticipated that the Neighbourhood Plan will be submitted to Lewes District Council in 2021 for subsequent independent examination. Key information relating to the Peacehaven and Telscombe Neighbourhood Plan is presented in **Table 1.1**.

Table 1.1: Key facts relating to the Peacehaven and Telscombe Neighbourhood Plan

Name of Responsible Authority	Peacehaven Town Council and Telscombe Town Council
Title of Plan	Peacehaven and Telscombe Neighbourhood Plan
Subject	Neighbourhood planning
Purpose	The Peacehaven and Telscombe Neighbourhood Plan is being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and Neighbourhood Planning (General) Regulations 2012. The plan will be in general conformity with the Lewes Local Plan, the key documents of which include the Lewes Core Strategy: Local Plan Part 1 (adopted in May 2016) and the Lewes Local Plan Part 2: Site Allocations and Development Management Policies (adopted in February 2020). The Peacehaven and Telscombe Neighbourhood Plan will be used to guide and shape development within the Neighbourhood Plan area.
Timescale	To 2030
Area covered by the plan	The Peacehaven and Telscombe Neighbourhood Plan area covers the parish of Peacehaven and the parish of Telscombe, located in Lewes District.
Summary of content	The Peacehaven and Telscombe Neighbourhood Plan will set out a vision, strategy and range of policies for the Neighbourhood Plan area.
Plan contact point	Jim Boot, Community Planner Email address: jimbootcp@gmail.com

Relationship of the Peacehaven and Telscombe Neighbourhood Plan to the Lewes Local Plan

1.4 The Peacehaven and Telscombe Neighbourhood Plan is being prepared in the context of the Lewes Local Plan, the key documents of which include the Lewes Core Strategy: Local Plan Part 1 (adopted in May 2016)[1] and the Lewes Local Plan Part 2: Site Allocations and Development Management Policies (adopted in February 2020)[2]. The Core Strategy sets the overall vision for future land use and provides the framework for the scale and distribution of development up to 2030. It also contains 'core policies' that address key issues facing the district, in relation to sustainable resource management, community development, housing, the economy, the environment and transport. The Local Plan Part 2 contains specific site allocations and sets out more detailed policies for the effective management of development in relation to key issues.

1.5 Within the Lewes Core Strategy: Local Plan Part 1, Spatial Policy 1 'Provision of housing and employment land' determines the quantity of housing development across Lewes District over the Plan period. It states that, "in the period between 2010 and 2030, a minimum of 6,900 net additional dwellings will be provided in the plan area (this is the equivalent of approximately 345 net additional dwellings per annum". Spatial Policy 2 'Distribution of housing' sets a minimum of 255 net units within Peacehaven and Telscombe which is contingent on developers identifying and delivering a coordinated package of transport measures required to mitigate the impacts of development on the A259.

1.6 In areas where an emerging neighbourhood plan is identifying housing allocations, Local Plan Part 2: Site Allocations and Development Management Policies anticipates that the local needs will meet the minimum requirements as set out in Spatial Policy 2. In this respect, the Local Plan Part 2 outlines that the housing numbers in Spatial Policy 2 are expressed as minimum targets and, where appropriate, growth should exceed the minimum figures.

1.7 Additionally, Spatial Policy 8 'Land at Lower Hoddern Farm, Peacehaven' allocates eleven hectares of land for residential development (totalling 450 dwellings) on land to the north of the Meridian Centre. This strategic allocation is also contingent on the delivery of transport infrastructure improvements, including to the operation of the A259 / Telscombe Cliffs Way Junction, the Sutton Avenue Roundabout, and the Newhaven Ring Road. Furthermore, the Meridian Centre (within Peacehaven Parish) has been identified as an area of economic redevelopment, with the aim of enhancing the centre by improving connectivity and functionality for residents. Growth is encouraged through Core Policy 6 'Retail and Town Centres'.

1.8 Most of the western area of the Neighbourhood Plan area (including most of Telscombe Parish) is within the boundaries of the South Downs National Park. A small area of land within the north western section of Peacehaven Parish is also within the National Park. Adopted in July 2019, the South Downs Local Plan[3] (2014-2033) sets out how the South Downs National Park Authority (SDNPA) will manage development over the plan period, based on the two statutory purposes and duty for national parks, namely:

- **Statutory Purpose:** To conserve and enhance the natural beauty, wildlife and cultural heritage of the area;
- **Statutory Purpose:** To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public; and
- **Duty:** To seek to foster the social and economic well-being of the local communities within the National Park in pursuit of their statutory purposes.

[1] Lewes District Council (2016): 'Lewes Core Strategy: Local Plan Part 1', [online] available to access via: https://www.lewes-eastbourne.gov.uk/planning-policy/lewes-core-strategy-local-plan-part-1/
[2] Lewes District Council (2019): 'Lewes Local Plan Part 2: Site Allocations and Development Management Policies', [online] available to access via: https://www.lewes-eastbourne.gov.uk/planning-policy/lewes-local-plan-part-2-site-allocations-and-development-management-policies/
[3] South Downs National Park Authority (2019): 'South Downs Local Plan 2014-2033', [online] available to access via: <https://www.southdowns.gov.uk/planning/south-downs-local-plan_2019/local-plan/>

1.9 The provisions of the South Downs National Park Local Plan and Partnership Management Plan are further discussed under the 'Landscape' SEA theme in this Scoping Report.

1.10 Neighbourhood plans will form part of the development plan for Lewes District, alongside, but not as a replacement for the Local Plan. Neighbourhood plans are required to be in general conformity with the Local Plan and can develop policies and proposals to address local place-based issues. In this way it is intended for the Local Plan to provide a clear overall strategic direction for development in Lewes District, whilst enabling finer detail to be determined through the neighbourhood planning process where appropriate.

SEA for the Peacehaven and Telscombe Neighbourhood Plan

SEA Screening for the Neighbourhood Plan

1.11 The Peacehaven and Telscombe Neighbourhood Plan has been screened in by Lewes District Council as requiring a Strategic Environmental Assessment (SEA).

1.12 A Neighbourhood Plan requires SEA where it is likely to have significant environmental effects. In this respect, the Peacehaven and Telscombe Neighbourhood Plan has been screened in as requiring an SEA process for the following reasons:

- The Neighbourhood Plan will allocate new development in the parish. This includes potentially in environmentally sensitive locations, such as:
    - locations within the setting of the South Downs National Park;
    - locations with sensitivity for the historic environment, including nationally designated listed buildings, scheduled monuments, and the Telscombe Conservation Area; and
    - locations with sensitivity for biodiversity, including the Brighton to Newhaven Cliffs Site of Special Scientific Interest (SSSI) and Beachy Head West Marine Conservation Zone (MCZ).

1.13 In light of this screening outcome, an SEA process is being undertaken to meet the specific requirements prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).

SEA explained

1.14 SEA is a mechanism for considering and communicating the potential impacts of an emerging plan, and potential alternatives in terms of key environmental issues.

1.15 The aim of SEA is to inform and influence the plan-making process with a view to avoiding and mitigating potential negative impacts. Through this approach, the SEA for the Peacehaven and Telscombe Neighbourhood Plan seeks to maximise the emerging plan's contribution to sustainable development.

1.16 Two key procedural requirements of the SEA Regulations are that:

i. When deciding on 'the scope and level of detail of the information' which must be included in the Environmental Report there is a consultation with nationally designated authorities concerned with environmental issues; and

ii. A report (the 'Environmental Report') is published for consultation alongside the Draft Plan (i.e. the draft Peacehaven and Telscombe Neighbourhood Plan) that presents outcomes from the environmental assessment (i.e. discusses 'likely significant effects' that would result from plan implementation) and reasonable alternatives.

This Scoping Report

1.17 This 'Scoping Report' is concerned with item 'i' above. It presents a suggested scope for the SEA so that the designated authorities (Historic England, Natural England and the Environment Agency) can provide timely comment.

SEA 'Scoping' Explained

1.18 Developing the draft scope for the SEA as presented in this report has involved the following steps:

i. Defining the broader context for the Peacehaven and Telscombe Neighbourhood Plan and associated SEA (i.e. EU, UK Government and local policy and commitments), to summarise the regulatory and legislative landscape;

ii. Establishing the baseline for the SEA, (i.e. the current and future situation in the area in the absence of the Peacehaven and Telscombe Neighbourhood Plan, in order to help identify the plan's likely significant effects;

iii. Identifying particular problems or opportunities ('issues') that should be a particular focus of the SEA; and

iv. Developing a SEA Framework comprising objectives and appraisal questions on the basis of these issues which can then be used to appraise the draft plan.

Structure of this Report

Key Sustainability Issues

1.19 The outcomes of the scoping elements introduced through steps i-iv above have been presented under a series of key environmental themes, as follows:

- Air Quality
- Biodiversity and Geodiversity
- Climatic Factors (including flood risk)
- Landscape
- Historic Environment
- Land, Soil and Water Resources
- Population and Community
- Health and Wellbeing
- Transportation

1.20 The selected environmental themes incorporate the 'SEA topics' suggested by Annex I (f) of the SEA Directive[4]. These were refined to reflect a broad understanding of the anticipated scope of plan effects. It is intended that presenting the scoping information under these themes will help enable the reader to easily locate the information of greatest interest to them. Once agreed (i.e. subsequent to consultation on this Scoping Report), the suggested scope presented under these nine themes will provide a methodological 'framework' for the environmental assessment of the draft plan and reasonable alternatives.

1.21 The discussion of the scoping information for each theme is presented in Sections 2 to 10.

SEA Framework to assess policy proposals

1.22 The SEA Framework provides a way in which environmental effects can be defined and subsequently analysed based on standard 'tests'. Each proposal within the emerging Peacehaven and Telscombe Neighbourhood Plan will be assessed consistently using the framework.

1.23 The SEA objectives and appraisal questions proposed for the Peacehaven and Telscombe Neighbourhood Plan SEA are presented under each of the themes in Sections 2 to 10.

[4] The SEA Directive is 'of a procedural nature' (para 9 of the Directive preamble) and does not set out to prescribe particular issues that should and should not be a focus, beyond requiring a focus 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' [our emphasis]

2. Air Quality

Focus of Theme

- Air pollution sources
- Air quality hotspots
- Air quality management

Policy Context

2.1 Key messages from the National Planning Policy Framework (NPPF)[5] include:

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

2.2 The Air Quality Standards Regulations 2010 transpose into UK law the Ambient Air Quality Directive (2008/50/EC) which sets legally binding limits for outdoor concentrations of major air pollutants which impact public health.

2.3 Published in January 2018 by the UK Government, 'A Green Future: Our 25 Year Plan to Improve the Environment'[6] sets out a number of goals and policies in order to help the natural world regain and retain good health. In this context, Goal 1 'Clean Air' and the policies contained within 'Chapter 4: Increasing resource efficiency and reducing pollution and waste' within the 25-year plan directly relate to the air quality SEA theme.

2.4 The government published the 'UK plan for tackling roadside nitrogen dioxide concentrations' in July 2017.[7] This is the air quality plan for bringing nitrogen dioxide within statutory limits in the shortest possible time. The plan identifies that *"the link between improving air quality and reducing carbon emissions is particularly important*" and that consequently the UK government is determined to be at the forefront of vehicle innovation by making motoring cleaner.

2.5 The Clean Air Strategy 2019 identifies how government will tackle all sources of air pollution and is aimed at complementing the Industrial Strategy, Clean Growth Strategy and 25 Year Environment Plan. The strategy proposes new goals to cut public exposure to particulate matter pollution and sets out the comprehensive action that is required from across all parts of government and society to meet these goals. The proposed measures include new legislation

[5] HM GOV (2018): 'Revised National Planning Policy Framework', [online] available to access via: https://www.gov.uk/government/collections/revised-national-planning-policy-framework
[6] HM GOV (2018): 'A Green Future: Our 25 Year Plan to Improve the Environment', [online] available to access via: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf
[7] DEFRA (2017) 'UK plan for tackling nitrogen dioxide concentrations' [online], available from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/633269/air-quality-planoverview

and new local powers to take action in areas with an air pollution problem, including through the creation of 'Clean Air Zones'.

2.6 In February 2020, the UK government updated the Clean Air Zone[8] Framework[9], which sets out the principles for the operation of Clean Air Zones England and provides the expected approach to be taken by local authorities when implementing and operating a Clean Air Zone. Clean Air Zones bring together local measures to deliver immediate action to improve air quality and health with support for cities to grow while delivering sustained reductions in pollution and a transition to a low emission economy. Where a Clean Air Zone is introduced it will be identified in the local plans and policies, and within local transport plans at the earliest opportunity to ensure it is consistent with wider ambition.

2.7 Local Planning Authorities are required to publish annual Air Quality Annual Status Reports (ASRs) to discharge their monitoring obligations under Part IV of the Environment Act (1995). Part IV of the Environment Act 1995 and Part II of the Environment (Northern Ireland) Order 2002 requires local authorities in the UK to review air quality in their area and designate Air Quality Management Areas (AQMAs) if improvements are necessary. Where an AQMA is designated, an Air Quality Action Plan (AQAP) must then be put in place. The most recently completed AQAP[10] for Lewes District was completed in May 2009, and primarily includes measures to improve air quality within the Lewes Town Centre AQMA.

2.8 At the local level, the following policies within the Lewes Core Strategy: Local Plan Part 1 directly relate to the Air Quality theme:

- Core Policy 8: Green Infrastructure;
- Core Policy 9: Air Quality;
- Core Policy 13: Sustainable Travel; and
- Core Policy 14: Renewable and Low Carbon Energy.

2.9 Additionally, the following policies within the Lewes Local Plan Part 2: Site Allocations and Development Management Policies directly relate to the Air Quality theme:

- Policy DM14: Multi-Functional Green Infrastructure; and
- Policy DM20: Pollution Management.

Baseline Summary

Summary of Current Baseline

2.10 There are no Air Quality Management Areas (AQMAs) located within the Neighbourhood Plan area. In the wider context, there is a small AQMA in Brighton and Hove located on Rottingdean High Street from the A259 junction to the T-junction with Vicarage Lane (to the west of Peacehaven and Telscombe)[11]. There is another small AQMA located in Newhaven to the east of the Neighbourhood Plan area, which incorporates Newhaven Town Centre, Southway, Northway, and sections of the A259 Brighton Road, Lewes Road and the swing bridge[12]. Both AQMAs have been designated due to exceedances in the annual objective concentrations for nitrogen dioxide (NO_2).

2.11 The 2019 Air Quality Annual Status Report for Lewes District[13] confirms that there are three diffusion tubes within Peacehaven which monitor air quality, including: South Coast Road

[8] Defined as: *'an area where targeted action is taken to improve air quality and resources are prioritised and coordinated in order to shape the urban environment in a way that delivers improved health benefits and supports economic growth'*.
[9] Department for Environment, Food and Rural Affairs (2020) Clean Air Zone Framework: Principles for setting up Clean Air Zones in England [online] available from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863730/clean-air-zone-framework-feb2020.pdf
[10] Lewes District Council (2009): 'Air Quality Action Plan', [online] accessible via: https://www.lewes-eastbourne.gov.uk/environmental-problems/air-quality-and-health/?assetdet10d745fc-61cd-4ac1-89c0-b944afa2f37b=261611
[11] Defra – AQMA Details [online] available to access via: https://uk-air.defra.gov.uk/aqma/details?aqma_ref=1561
[12] Defra – AQMA Details [online] available to access via: https://uk-air.defra.gov.uk/aqma/details?aqma_ref=1576
[13] Lewes District Council (2019): 'Air Quality Annual Status Report', [online] available to access via: <https://sussex-air.net/ImprovingAQ/AQManagement/Reports.aspx?LA=Lewes>

(Cornwall Avenue o/s 223), Steyning Avenue, and South Coast Road (o/s 53). South Coast Road (part of the A259) is the main route into and out of Peacehaven, and the air quality monitoring is kerbside (approximately 3m from the road). Reflecting the results of the air quality monitoring, all three sites did not exceed the national objective of 40 µg/m^3 for the annual mean concentrations of NO_2 throughout 2017 or 2018. The average concentration was 24.6 µg/m^3 across the three sites.

Summary of Future Baseline

2.12 New housing and employment provision taken forward within the Neighbourhood Plan area has the potential for adverse effects on air quality through increasing traffic flows and associated levels of pollutants. Improvements to future air quality are dependent, in part, on whether the measures within the AQAP and the East Sussex Local Transport Plan (later discussed in the Transportation chapter of this SEA Scoping Report) are successfully implemented.

Key Sustainability Issues

- There are no AQMAs within the Neighbourhood Plan area. Reflecting the results of the air quality monitoring, all three sites in Peacehaven did not exceed the national objective of 40 µg/m^3 for the annual mean concentrations of NO_2 throughout 2017 or 2018.
- NO_2 is the key pollutant of concern within the Neighbourhood Plan area, particularly along South Coast Road (the A259).
- There are two AQMAs to the east and west of the Neighbourhood Plan area which may be impacted by future growth within Peacehaven and Telscombe, specifically: Newhaven AQMA and Brighton and Hove AQMA.
- It will be important to consider any potential traffic and congestion issues arising within and surrounding the Neighbourhood Plan area as a result of new development proposals.

2.13 Nonetheless, due to the absence of any significant air quality issues within the Neighbourhood Plan area, **the air quality theme has been scoped out of the SEA process.**

3. Biodiversity and Geodiversity

Focus of Theme

- Nature conservation designations
- Geological sites
- Habitats
- Species

Policy Context

3.1 At the European level, the EU Biodiversity Strategy[14] was adopted in May 2011 in order to deliver an established new Europe-wide target to '*halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020*'.

3.2 Key messages from the National Planning Policy Framework (NPPF) include:

- One of the three overarching objectives of the NPPF is an environmental objective to *'contribute to protecting and enhancing our natural, built and historic environment' including by 'helping to improve biodiversity.'*
- *'Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value […], take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scape across local authority boundaries.'*
- *'Planning policies and decisions should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with the statutory status or identified quality in the development plan); and minimising impacts on and providing net gains for biodiversity, including establishing coherent ecological networks that are more resilient to current and future pressures.'*
- *'To protect and enhance biodiversity and geodiversity, plans should:*

  a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and

  b) Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity'.
- Paragraph 175: *When determining planning applications, local planning authorities should apply the following principles:*

  a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

  b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

[14] European Commission (2011): 'Our life insurance, our natural capital: an EU biodiversity strategy to 2020', [online] available to access via: http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/EP_resolution_april2012.pdf

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged.

3.3 The Natural Environment White Paper (NEWP)[15] sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering communities and personal well-being. It was in part a response to the UK's failure to halt and reverse the decline in biodiversity by 2010 and it signalled a move away from the traditional approach of protecting biodiversity in nature reserves to adopting a landscape approach to protecting and enhancing biodiversity. The NEWP also aims to create a green economy in which economic growth and the health of our natural resources sustain each other and markets, business and Government better reflect the value of nature. It includes commitments to:

- Halt biodiversity loss support functioning ecosystems and establish coherent ecological networks by 2020;
- Establish a new voluntary approach to biodiversity offsetting to be tested in pilot areas;
- Enable partnerships of local authorities, local communities and landowners, the private sector and conservation organisations to establish new Nature Improvement Areas; and
- Address barriers to using green infrastructure to promote sustainable growth.

3.4 The UK Biodiversity Action Plan[16] (BAP) identifies priority species and habitats requiring conservation action. Although the UK BAP has been superseded, BAP priority species and habitats have been used to draw up statutory lists of priority species and habitats in England.

3.5 Reflecting the commitments within the Natural Environment White Paper and the EU Biodiversity Strategy, 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services' aims to *'halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people'*[17].

3.6 The recently published 25 Year Environment Plan[18] sets out the Government's environmental plan of action over the next quarter century, in the context of Brexit. The Plan aims to tackle the growing problems of waste and soil degradation, improving social justice through tackling pollution and promoting the mental and physical health benefits of the natural world. It also sets out how the Government will address the effects of climate change. These aims are supported by a range of policies and initiatives (including mandatory biodiversity net gain, the development of a Nature Recovery Network, enhancing natural capital, and establishing Local Nature Recovery Strategies) which are focused on the following six key areas:

- Using and managing land sustainably;
- Recovering nature and enhancing the beauty of landscapes;
- Connecting people with the environment to improve health and wellbeing;
- Increasing resource efficiency, and reducing pollution and waste;
- Securing clean, productive and biologically diverse seas and oceans; and
- Protecting and improving the global environment.

[15] Defra (2012): 'The Natural Choice: securing the value of nature (Natural Environment White Paper)', [online] available to access via: http://www.official-documents.gov.uk/document/cm80/8082/8082.pdf
[16] JNCC (2007) UK BAP priority species [online] http://archive.jncc.gov.uk/page-5717
[17] DEFRA (2011): 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services', [online] Available to access via: <https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services>
[18] HM GOV (2018): 'A Green Future: Our 25 Year Plan to Improve the Environment', [online] available to access via: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf

3.7 In this context, Goal 3 'Thriving plants and wildlife' and the policies contained within Chapter 2 'Recovering nature and enhancing the beauty of landscapes' and Chapter 5 'Securing clean, productive and biologically diverse seas and oceans' directly relate to the Biodiversity and Geodiversity SEA theme.

3.8 Additionally, Natural England's Natural Capital Atlas for East Sussex (June 2020) sets out indicators to explore the distribution and condition of natural assets across the county and the benefits they provide to society[19]. The Atlas maps the quality of broad habitat types across East Sussex, including freshwater, farmland, grasslands, moorland / heathland, woodland, urban, coastal / marine, and will provide a useful source of reference for the subsequent stages of the SEA process.

3.9 At the local level, the following policies within the Lewes Core Strategy: Local Plan Part 1 directly relate to the Biodiversity and Geodiversity theme:

- Core Policy 8: Green Infrastructure; and
- Core Policy 10: Natural Environment and Landscape.

3.10 Additionally, the following policies within the Lewes Local Plan Part 2: Site Allocations and Development Management Policies directly relate to the Biodiversity and Geodiversity theme:

- Policy DM14: Multi-Functional Green Infrastructure; and
- Policy DM24: Protection of Biodiversity and Geodiversity.

Baseline Summary

Summary of Current Baseline

European and nationally designated sites

3.11 The Neighbourhood Plan area does not contain any European designated sites. In the wider context, there are two Special Areas of Conservation (SAC) within a 10km radius of Peacehaven and Telscombe, namely: Castle Hill SAC (to the north west) and Lewes Downs SAC (to the north).

3.12 Nationally designated, the 'Brighton to Newhaven Cliffs'[20] Sites of Special Scientific Interest (SSSI) is located along the coastal boundary of the Neighbourhood Plan area. The SSSI comprises two sites formerly known as Black Rock and Peacehaven Cliffs to Castle Hill. Notified in December 1986 and covering approximately 165 ha, the citation for the SSSI states:

"Although the main interest of the site is geological, some rare and uncommon plants grow both on the cliff face and in the narrow strip of cliff-top chalk grassland. The cliffs support a locally important colony of breeding seabirds and a diverse community of beetles. The wave-cut platform is worn into a characteristic pattern of gullies and ridges at right angles to the sea and supports a variety of typical invertebrates and algae.

"Unimproved chalk grassland grows in small pockets between the cliff top and the adjacent fenceline. Amongst the red fescue (*Festuca rubra*) and sea couch (*Agropyron pungens*) grow herbs such as wild carrot (*Daucus carota*), common bird's-foot trefoil (*Lotus corniculatus*) and lady's bedstraw (*Galium verum*). Several uncommon maritime plants grow both on the top and face of the cliff. These include the rare species hoary stock (*Matthiola incana*), rock sea-lavendar (*Limonium binervosum*) and sea-heath (*Frankenia laevis*).

"Brighton to Newhaven Cliffs provides the best and most extensive exposure of the *Offaster pilula* Zone in England. The gentle folding and the superb accessibility of the base of the cliff make this an important collecting site for faunas of the upper Santonian and lower Campanian. It is a nationally important reference section for the upper Cretaceous. The beach and cliff are generally thought to date from the second half of the last (Ipswichian) interglacial. The angle

[19] Natural England (2020): 'Natural Capital Atlas 12 – East Sussex', [online] available to access via: <http://publications.naturalengland.org.uk/publication/6672365834731520>
[20] Natural England (no date): 'Brighton to Newhaven Cliffs SSSI', [online] available to access via: <https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=s1003033>

between the beach and the old cliff is filled by great quantities of coarse chalk rubble apparently derived from the weathering and erosion of the cliff in Devensian times. The chalk rubble is also particularly notable for its fossil remains of many Devensian mammals."

3.13 Based on the most recent condition assessments for the Brighton to Newhaven Cliffs SSSI completed between 2007-2014, 91.12% of the SSSI was classified as having a 'favourable' condition. The remaining 8.88% of the SSSI was classified as having an 'unfavourable - recovering' condition.

3.14 SSSI Impact Risk Zones (IRZ) are a GIS tool/dataset which maps zones around each SSSI according to the sensitivities of the features for which it is notified. They specify the types of development that have the potential to have adverse impacts at a given location, including residential, rural-residential and rural non-residential. Natural England is a statutory consultee on development proposals that might impact on SSSIs. In this respect, the southern half of the Neighbourhood Plan area overlaps with either one or multiple SSSI Impact Risk Zones for the types of development likely to be taken forward during the plan period (i.e. residential, rural-residential or rural non-residential development types).

3.15 Marine Conservation Zones (MCZs) are areas that protect a range of nationally important, rare or threatened habitats and species within the 'blue belt' around the English Coast[21]. The UK Government has designated over fifty MCZs since 2013, including 'Beachy Head West' which extends along the coastal boundary of the Neighbourhood Plan area[22]. The MCZ consists of two spatially separate sites; Brighton Marina to Newhaven and Newhaven to Beachy Head with a gap at Newhaven port. One of the main reasons for the MCZ designation is the extensive intertidal wave cut chalk platforms and subtidal chalk ridges, which are among the best examples of marine chalk habitat in the South East. The chalk supports a great diversity of species, including rock-boring worms, barnacles, anemones, crustaceans (e.g. velvet swimming crabs, lobsters, prawns) and molluscs (e.g. rock-boring piddocks, top shell snails, periwinkles, limpets). The MCZ has a total of 14 designated features, including:

- **Sediments:** Intertidal coarse sediment, Infralittoral sandy mud, Infralittoral muddy sand, Subtidal mixed sediment, Subtidal sand and Subtidal mud;
- **Rock:** Low energy infralittoral rock and thin sandy sediment, Littoral chalk communities, Subtidal chalk, Moderate energy circalittoral rock and High energy circalittoral rock; and
- **Species:** Short-snouted seahorse (*Hippocampus hippocampus*), Native oyster (*Ostrea edulis*) and Blue mussel beds (*Mytilus edulis*).

Locally important sites

3.16 Local Nature Reserves (LNRs) may be established by Local Authorities in consultation with English Nature under Section 21 of the National Parks and Access to the Countryside Act 1949 and are habitats of local importance. The nearest LNR is located approximately 1km to the east of the Neighbourhood Plan area, specifically: Castle Hill, Newhaven. Designated in April 2003 and covering an area of approximately 16.4 ha, the LNR contains a geologically important cliff formation of chalk overlaid by clay and greensand[23].

3.17 There is a variety of Biodiversity Action Plan (BAP) Priority Habitats located within or within proximity to the Neighbourhood Plan area, predominantly areas of good quality semi-improved grassland, areas of deciduous woodland, and areas of maritime cliff and slope.

3.18 The Sussex Biodiversity Records Centre contains records of protected or notable species within the Neighbourhood Plan area[24]. This includes records of several species of birds, mammals, bats, insects, grasses, trees, amphibians and reptiles; many of which are protected under the Wildlife and Countryside Act 1981 (as amended) and under Section 41 of the Natural Environment and Rural Communities Act 2006. In this respect, the BAP Priority Habitats and

[21] GOV.UK (2016): 'Marine Conservation Zones', [online] available to access via: <https://www.gov.uk/government/collections/marine-conservation-zone-designations-in-england>
[22] Sussex Inshore Fisheries and Conservation Authority (2020): 'Beachy Head West MCZ' [online] available to access via: <https://www.sussex-ifca.gov.uk/beachy-head-west-mcz>
[23] Natural England (no date): 'Castle Hill, Newhaven LNR', [online] available to access via: <https://designatedsites.naturalengland.org.uk/SiteLNRDetail.aspx?SiteCode=L1009910>
[24] Sussex Biodiversity Record Centre (2020): 'Data Search' [online] available to access via: <https://sxbrc.org.uk/home/>

ecological designations within and surrounding the Neighbourhood Plan area are likely to support populations of protected species.

Summary of Future Baseline

3.19 Habitats and species will potentially face increasing pressures from future development within the Neighbourhood Plan area, with the potential for negative impacts on the wider ecological network. This may include a loss of habitats and impacts on biodiversity networks, which may be exacerbated by the effects of climate change. This has the potential to lead to changes in the distribution and abundance of species and changes to the composition of habitats.

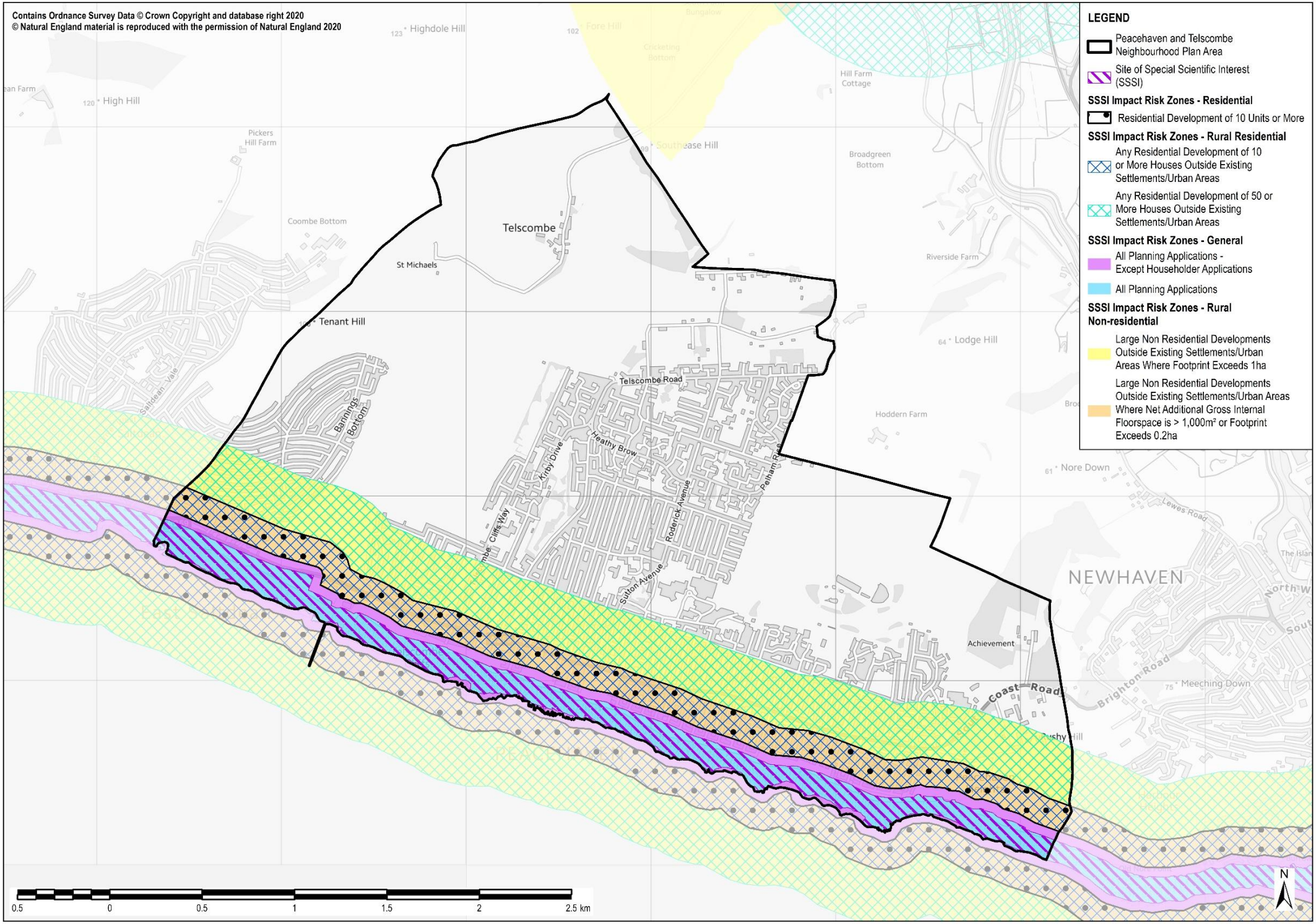
3.20 The Neighbourhood Plan presents an opportunity to maximise benefits for biodiversity by including consideration of important habitats, species and designated sites at an early stage of planning for future growth. To maintain and improve the condition of biodiversity in the future, it will be important to not only protect and enhance important habitats but the connections between them. It will be crucial to effectively coordinate the delivery of housing, employment and infrastructure to ensure that opportunities to improve green infrastructure and ecological corridors are maximised within the Neighbourhood Plan area and in the surrounding areas.

Key Sustainability Issues

- There are two Special Areas of Conservation within a 10km radius of Peacehaven and Telscombe, namely: Castle Hill SAC (to the north west) and Lewes Downs SAC (to the north).
- The 'Brighton to Newhaven Cliffs' Sites of Special Scientific Interest (SSSI) is located along the coastal boundary of the Neighbourhood Plan area.
- The southern half of the Neighbourhood Plan area overlaps with either one or multiple SSSI Impact Risk Zones for the types of development likely to be taken forward during the plan period (i.e. residential, rural-residential or rural non-residential development types).
- A key reason for the Beachy Head West MCZ designation (along the coastal Neighbourhood Plan area boundary) is the extensive intertidal wave cut chalk platforms and subtidal chalk ridges, which are among the best examples of marine chalk habitat in the South East.
- There is a variety of Biodiversity Action Plan (BAP) Priority Habitats located within or within proximity to the Neighbourhood Plan area, predominantly areas of good quality semi-improved grassland, areas of deciduous woodland, and areas of maritime cliff and slope.
- The Sussex Biodiversity Records Centre contains records of protected or notable species within Peacehaven and Telscombe. This includes records of several species of birds, mammals, bats, insects, grasses, trees, amphibians and reptiles.

What are the SEA objectives and appraisal questions for the Biodiversity and Geodiversity SEA theme?

SEA objective	Assessment Questions
Protect and enhance all biodiversity and geodiversity	Will the option/proposal help to: • Support the integrity of the European designated biodiversity sites located within proximity to the Neighbourhood Plan area? • Support the status of the nationally and locally designated sites biodiversity sites within and within proximity to the Neighbourhood Plan area? • Protect and enhance priority habitats and species, including those listed in the annexes of the European Habitats Directive and the European Birds Directive? • Achieve biodiversity and environmental net gains and support the delivery of ecosystem services and multifunctional green infrastructure networks? • Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks? • Support access to, interpretation and understanding of biodiversity and geodiversity?



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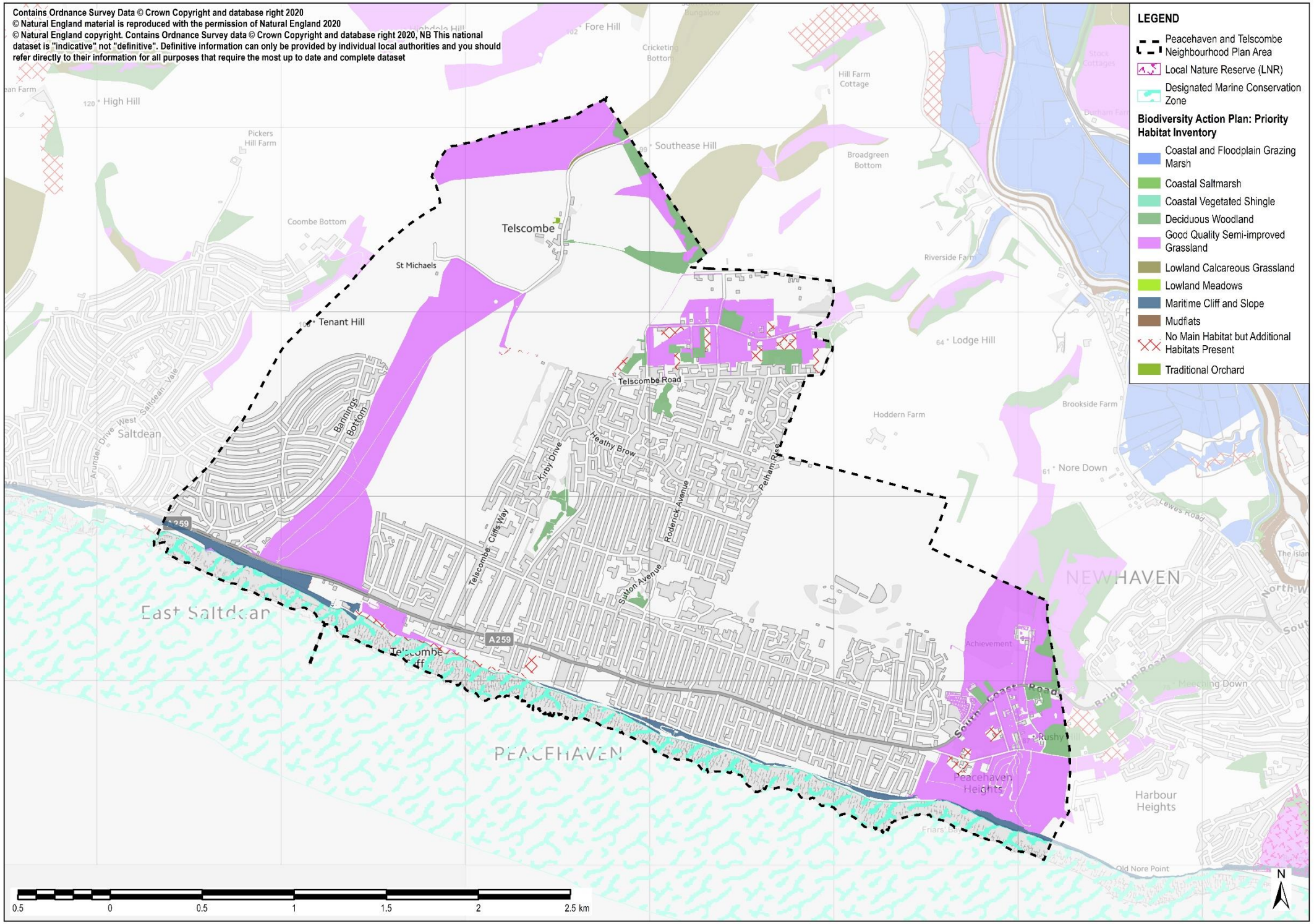


Document Path: I:\5004 - Information Systems\60571087_Neighbourhood_Plan_CRB_2018_2022\02_Maps\Peacehaven and Telscombe NP Steering Group\Biodiversity Designations.mxd

4. Climate Change

Focus of Theme

- Contribution to climate change
- Effects of climate change
- Climate change adaption
- Flood risk

Policy Context

4.1 The UK Climate Change Risk Assessment is published on a 5-yearly cycle in accordance with the requirements of the Climate Change Act 2008. It requires the Government to compile an assessment of the risks for the UK arising from climate change, and then to develop an adaptation programme to address those risks and deliver resilience to climate change on the ground. For both the 2012 and the 2017 UK Climate Change Risk Assessment, the Adaptation Sub-Committee commissioned an evidence report aiming to understand the current and future climate risks and opportunities. The evidence report contains six priority risk areas requiring additional action in the next five years, see below[25] :

- Flooding and coastal change risks to communities, businesses and infrastructure;
- Risks to health, well-being and productivity from high temperatures;
- Risk of shortages in the public water supply, and for agriculture, energy generation and industry;
- Risks to natural capital, including terrestrial, coastal, marine and freshwater ecosystems, soils and biodiversity;
- Risks to domestic and international food production and trade; and
- New and emerging pests and diseases, and invasive non-native species, affecting people, plants and animals.

4.2 The UK Climate Change Act[26] was passed in 2008 and established a framework to develop an economically credible emissions reduction path. It also highlighted the role it would take in contributing to collective action to tackle climate change under the Kyoto Protocol, and more recently as part of the UN-led Paris Agreement. The Climate Change Act 2008 (2050 Target Amendment) Order 2019 means that there is now in place a legally binding target of net zero by 2050. The Climate Change Act includes the following:

- Commits the UK government by law to reducing greenhouse gas emissions by at least 100% of 1990 levels (net zero) by 2050. This includes reducing emissions from the devolved administrations (Scotland, Wales and Northern Ireland), which currently account for about 20% of the UK's emissions. The 100% target was based on advice from the CCC's 2019 report, 'Net Zero – The UK's contribution to stopping global warming' and introduced into law through the Climate Change Act 2008 (2050 Target Amendment) Order 2019.
- 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 carbon budgets are designed to reflect the cost-effective path to achieving the UK's long-term objectives. The first five carbon budgets have been put into legislation and run up to 2032.

[25] GOV UK: 'UK Climate Change Risk Assessment Report January 2017', [online] available to access via: https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2017
[26] GOV.UK (2008): 'Climate Change Act 2008', [online] accessible via http://www.legislation.gov.uk/ukpga/2008/27/contents

- The Committee on Climate Change was set up to advise the Government on emissions targets, and report to Parliament on progress made in reducing greenhouse gas emissions.
- The Act requires the Government to assess the risks and opportunities from climate change for the UK, and to prepare for them. The Committee on Climate Change's Adaptation Sub-Committee advises on these climate change risks and assesses progress towards tackling them. The associated National Adaptation Programme requires the Government to assess the risks to the UK from climate change, prepare a strategy to address them, and encourage key organisations to do the same.

4.3 Key messages from the National Planning Policy Framework (NPPF) include:

- One of the three overarching objectives of the NPPF is an environmental objective to *'contribute to protecting and enhancing our natural, built and historic environment'* including by *'mitigating and adapting to climate change'* and *'moving to a low carbon economy.' 'The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.'*
- *'Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.'*
- *'Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning.'*
- Direct development away from areas at highest risk of flooding (whether existing or future). *'Where development is necessary, it should be made safe for its lifetime without increasing flood risk elsewhere.'*

4.4 The Clean Air Strategy released in 2019 sets out the Government plans for dealing with all sources of air pollution. The strategy sets out proposals in detail and indicates how devolved administrations intend to make their share of emissions reductions, and complements the Industrial Strategy, Clean Growth Strategy and 25 Year Environment Plan.

4.5 In May 2019, the UK Parliament declared a climate emergency, with a view to explicitly acknowledging that human activities are significantly affecting the climate, and actions to mitigate and adapt to climate change should be paramount. This declaration has been mirrored by several local planning authorities across the country. Additionally, the shared vision produced by the Forestry Commission, Natural England and the Environment Agency in January 2020 outlines the use of nature-based solutions to tackle the climate and ecological emergency[27]. This includes through large-scale woodland planting in the right places, working with nature to manage flood risk, protecting and restoring peatlands, supporting farmers towards net zero, managing land in a more strategic way, as well as encouraging the use of less carbon intensive materials such as timber in construction.

4.6 In the context of the above, Lewes District Council are currently in the process of preparing a Climate Change and Sustainability Strategy[28] to address the causes and impacts of climate change across the district. This is in response to the Council's declaration of a climate emergency in 2019. The Strategy will contain key actions and milestones for the Council and

[27] GOV.UK (2020): 'Environmental bodies set joint vision to tackle climate change', [online] available to access via: https://www.gov.uk/government/news/environmental-bodies-set-joint-vision-to-tackle-climate-change
[28] Lewes District Council (2020): 'The Climate Change and Sustainability Strategy', [online] available to access via: https://www.lewes-eastbourne.gov.uk/community/climate-change/

stakeholder groups to deliver to reach a target of net zero carbon by 2030. The seven action areas include: energy and the built environment, sustainable travel and air quality, biodiversity, agriculture and food, reducing emissions from waste, water, and circular economy and community wealth.

4.7 Further context is provided by the recent commitment by environmental law firm Client Earth to request that all local authorities with emerging Local Plans to "*explain how they will set evidence-based carbon reduction targets and ensure these targets are then central to their new planning policy*."[29] Additionally, in response to the COVID-19 pandemic, the Green Alliance's 'Blueprint for a Resilient Economy'[30] report outlines the following five essential building blocks to support new long term employment opportunities, thriving businesses and a healthier, fairer society, whilst protecting against the potentially devastating future impacts of climate change and nature's decline:

- Invest in net zero infrastructure;
- Restore nature;
- Stop wasting valuable resources;
- Ensure clean air and healthy places; and
- Make the recovery fair.

4.8 The Flood and Water Management Act[31] highlights that alternatives to traditional engineering approaches to flood risk management include:

- Incorporating greater resilience measures into the design of new buildings, and retro-fitting properties at risk (including historic buildings);
- Utilising the environment in order to reduce flooding, for example through the management of land to reduce runoff and through harnessing the ability of wetlands to store water;
- Identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere;
- Planning to roll back development in coastal areas to avoid damage from flooding or coastal erosion; and
- Creating sustainable drainage systems (SuDS).[32]

4.9 Further guidance is provided in the document 'Planning for SuDS'.[33] This report calls for greater recognition of the multiple benefits that water management can present. It suggests that successful SuDS are capable of 'contributing to local quality of life and green infrastructure'.

4.10 The Local Flood Risk Management Strategy (2016-2026)[34] for East Sussex provides the framework for the management of local flood risk in the county for the ten year period 2016 – 2026. This strategy is a high level, statutory document that sets out East Sussex County Council's approach to limiting the impacts of local flooding across the county. It also provides a strategic framework for the risk management authorities to work within and goes on to establish new standing advice on drainage issues in the county. The long-term aim of the strategy is to provide a co-ordinated approach to managing local forms of flood risk in East Sussex.

4.11 There are several regional strategies that seek to address climate change mitigation and adaptation across Lewes District. This includes: The East Sussex Environment Strategy

[29] Client Earth (2019) Lawyers put local authorities on notice over climate inaction [online] available at: https://www.clientearth.org/press/lawyers-put-local-authorities-on-notice-over-climate-inaction/
[30] Green Alliance (2020): 'Blueprint for a Resilient Economy', [online] available to access via: https://green-alliance.org.uk/blueprint_for_a_resilient_economy.php
[31] Flood and Water Management Act (2010) [online] available to access via: http://www.legislation.gov.uk/ukpga/2010/29/contents
[32] N.B. The provision of Schedule 3 to the Flood and Water Management Act 2010 came into force on the 1st of October 2012 and makes it mandatory for any development in England or Wales to incorporate SuDs.
[33] CIRIA (2010): 'Planning for SuDs – making it happen', [online] available from: http://www.ciria.org/Resources/Free_publications/Planning_for_SuDS_ma.aspx
[34] East Sussex County Council (2016): East Sussex Local Flood Risk Management [online] available at: https://www.eastsussex.gov.uk/media/6955/flood-risk-strategy-2016-26-final-edition-ebook1-1.pdf

(2020)[35], the South2East Energy Strategy (2018)[36], East Sussex Local Transport Plan (2011)[37] and the South Downs National Park Climate Change Adaptation Plan[38].

4.12 At the local level, the following policies within the Lewes Core Strategy: Local Plan Part 1 directly relate to the Climate Change theme:

- Core Policy 8: Green Infrastructure;
- Core Policy 10: Natural Environment and Landscape;
- Core Policy 12: Flood Risk, Coastal Erosion & Drainage;
- Core Policy 13: Sustainable Travel; and
- Core Policy 14: Renewable and Low Carbon Energy.

4.13 Additionally, the following policies within the Lewes Local Plan Part 2: Site Allocations and Development Management Policies directly relate to the Climate Change theme:

- Policy DM14: Multi-Functional Green Infrastructure.

Baseline Summary

Summary of Current Baseline

Contribution to climate change

4.14 CO_2 emissions from the built environment are monitored and recorded at Local Authority level. In relation to greenhouse gas emissions, source data from the Department of Energy and Climate Change[39] suggests that Lewes District has recorded lower per capita emissions than the South East of England since 2005.

4.15 **Figure 4.1** below indicates that the rate of emissions reduction for Lewes is slightly lower than the rate for the East Sussex. In this respect, Lewes District has seen a 39.9% reduction in total emissions per capita since 2005, lower than the totals for East Sussex (40.0%), the South East (41.3%) and England (41.1%).

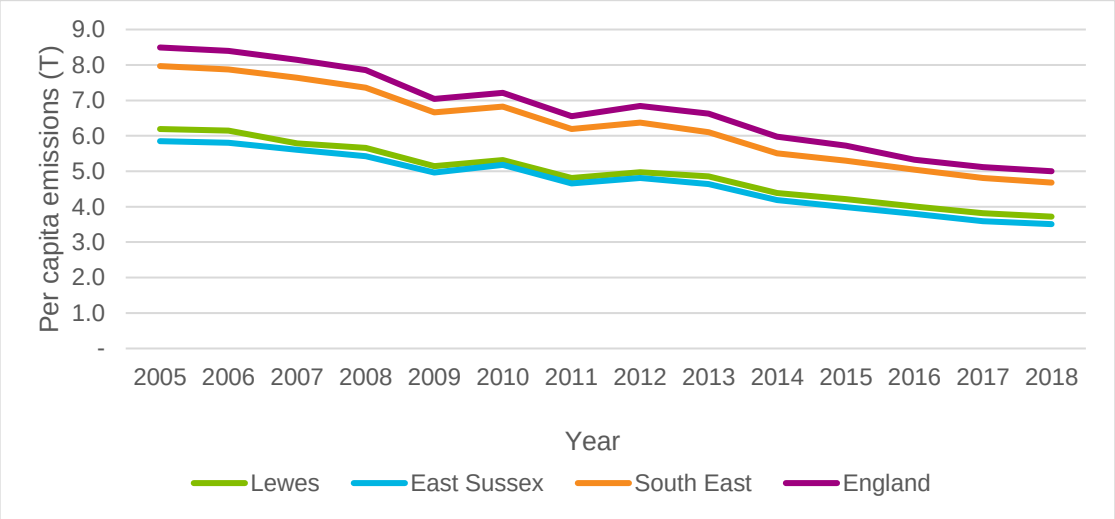


Figure 4.1: Carbon dioxide emissions per capita, 2005- 2018

[35] East Sussex Environment Board (2020) East Sussex Environment Strategy 2020 [online] available to access via: https://www.eastsussex.gov.uk/media/15587/east-sussex-environment-strategy-2020.pdf
[36] South East Local Enterprise Partnerships (2018) South2East Energy Strategy [online] available to access via: https://www.coast2capital.org.uk/storage/downloads/energy_south2east_-_energy_strategy-1554122644.pdf
[37] East Sussex County Council (2011) East Sussex Local Transport Plan [online] available to access via: https://www.eastsussex.gov.uk/roadsandtransport/localtransportplan/ltp3/
[38] South Downs National Park Authority - SDNPA Climate Change Adaptation Plan [online] available to access via: https://www.southdowns.gov.uk/sdnpa-climate-change-adaptation-plan/
[39] UK Gov (2017): 'Local Authority CO2 emissions estimates 2005-2017 (kt CO2) - Full dataset' [online] available from: https://www.gov.uk/government/collections/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics

4.16 Road transport is the largest emitter of GHG in the UK, with cars contributing 55% of UK domestic transport emissions (68 Metric tonnes CO_2 equivalent (MtCO2e)) in 2018. Lewes District has a high dependency on private vehicles, with a large proportion of the population commuting by car (see **Chapter 10** of this Scoping Report for more details).

4.17 The uptake of Ultra Low Emission Vehicles (ULEVs) will contribute positively towards the reduction of road transport related emissions. In line with assumptions made by the Department for Transport's 'Road to Zero' report (2018), it is assumed that ULEV uptake will increase rapidly in the coming decade and therefore aside from HGVs, all vehicles could be ultra-low emission (powered either by hydrogen or electricity) by 2030.

4.18 In 2019, Lewes District Council unanimously agreed to declare a climate emergency and become carbon neutral by 2030, working to reduce the worst impacts of climate change in the area[40]. One of the seven action areas identified was to work toward more sustainable methods of travel. As noted in the Council's Carbon Emissions Analysis and Pathways report[41] transportation is the second largest source of emissions, contributing 37% of the district's total emissions (the largest source of emissions in the district comes from buildings (56%)). The proposed measures to reducing the amount of emissions from transportation include travelling shorter distances, driving less, switching to electric vehicles, and improving freight emissions. Additionally, the East Sussex Environment Strategy (2020)[42] 'aims and actions' seek to develop and implement an electric vehicle strategy for East Sussex, as well as develop a local cycling and walking Infrastructure Plan in order to reduce CO_2 emissions and air pollution.

4.19 There is one EV charging station located in the Neighbourhood Plan area. This station, the Esso Peacehaven, is located on the South Coast Road (though the station is currently out of service)[43]. There are many other charging stations located in neighbouring settlements, with a large concentration of EV stations located in the city of Brighton, as shown below in **Figure 4.2**.

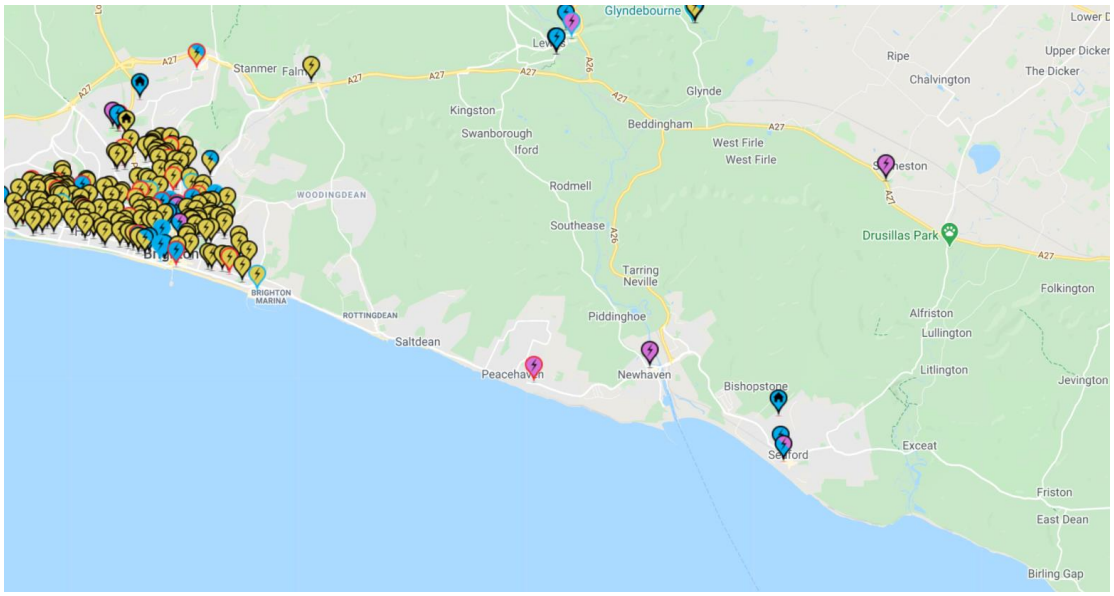


Figure 4.2 Map of EV charging stations near the Neighbourhood Plan area

Effects of climate change

4.20 The outcome of research on the probable effects of climate change in the UK was released in 2018 by the UK Climate Projections (UKCP18)[44] team. UKCP18 gives climate information for

[40]Lewes District Council – Climate Change [online] available from: https://www.lewes-eastbourne.gov.uk/community/climate-change/
[41] Lewes District Council (2020) Carbon Emissions Analysis and Pathways [online] available from: https://www.lewes-eastbourne.gov.uk/_resources/assets/inline/full/0/291623.pdf
[42] East Sussex Environment Board (2020) East Sussex Environment Strategy 2020 [online] available to access via: https://www.eastsussex.gov.uk/media/15587/east-sussex-environment-strategy-2020.pdf
[43] Zap Maps - Peacehaven charging points [online] available from: https://www.zap-map.com/locations/peacehaven-charging-points/
[44] Data released 26th November 2018 [online] available from: https://www.metoffice.gov.uk/research/collaboration/ukcp

the UK up to the end of this century and projections of future changes to the climate are provided, based on simulations from climate models. Projections are broken down to a regional level across the UK and are shown in probabilistic form, which illustrate the potential range of changes and the level of confidence in each prediction.

4.21 As highlighted by the research, the effects of climate change (under medium emissions scenarios 50th percentile and RCP6) for the South East during the period 2020-2039 compared to the period 1981-2000 are likely to be as follows:[45]

- A central estimate of increase in annual mean temperatures of between 1ºC and 2ºC; and
- A central estimate of change in mean precipitation of +10% to +20% in winter and -10% to -20% in summer.

4.22 During the period 2040-2059 this is estimated further as:

- A central estimate of increase in annual mean temperatures of between 2ºC and 5ºC; and
- A central estimate of change in annual mean precipitation of +10% to +30% in winter and -10% to -30% in summer.

4.23 Resulting from these changes, a range of risks may exist for the Neighbourhood Plan area, including:

- Effects on water resources from climate change;
- Reduction in availability of groundwater for extraction;
- Adverse effect on water quality from low stream levels and turbulent stream flow after heavy rain;
- Increased risk of flooding, including increased vulnerability to 1:100 year floods;
- A need to increase the capacity of wastewater treatment plants and sewers;
- A need to upgrade flood defences;
- Soil erosion due to flash flooding;
- Loss of species that are at the edge of their southerly distribution;
- Spread of species at the northern edge of their distribution;
- Increased demand for air-conditioning;
- Increased drought and flood related problems such as soil shrinkages and subsidence;
- Risk of road surfaces melting more frequently due to increased temperature; and
- Flooding of roads

4.24 Given the coastal location of the Neighbourhood Plan area, several properties within Peacehaven and Telscombe are located within proximity to the Brighton to Newhaven Cliffs. The cliff-edge is particularly vulnerable to erosion, both at the base and at the cliff-face. Climate change impacts have the potential to increase the risk of erosion, with more frequent rainfall events and intense storms speeding the weathering process[46].

Flood risk

4.25 As shown in **Figure 4.3** below, the main fluvial flood risk in the Neighbourhood Plan area is located along the southern boundary, along the coastline. The elevated setting of the Neighbourhood Plan area at the top of the Brighton to Newhaven Cliffs provides a natural flood defence. Therefore, most of the Neighbourhood Plan area is within Flood Zone 1 and has a

[45] Met Office (2018): 'Land Projection Maps: Probabilistic Projections', [online map] available at: https://www.metoffice.gov.uk/research/approach/collaboration/ukcp/land-projection-maps
[46] South East Coastal Group (2006): 'Beachy Head to Selsey Bill Shoreline Management Plan', [online] available to access via: https://www.southdowns.gov.uk/wp-content/uploads/2018/04/TLL-19-Beachy-Head-to-Selsey-Shoreline-Management-Plan-2006.pdf

low fluvial flood risk. Comparatively, the neighbouring town of Newhaven faces a greater fluvial flood risk from the River Ouse, which travels through the town centre and out to sea.

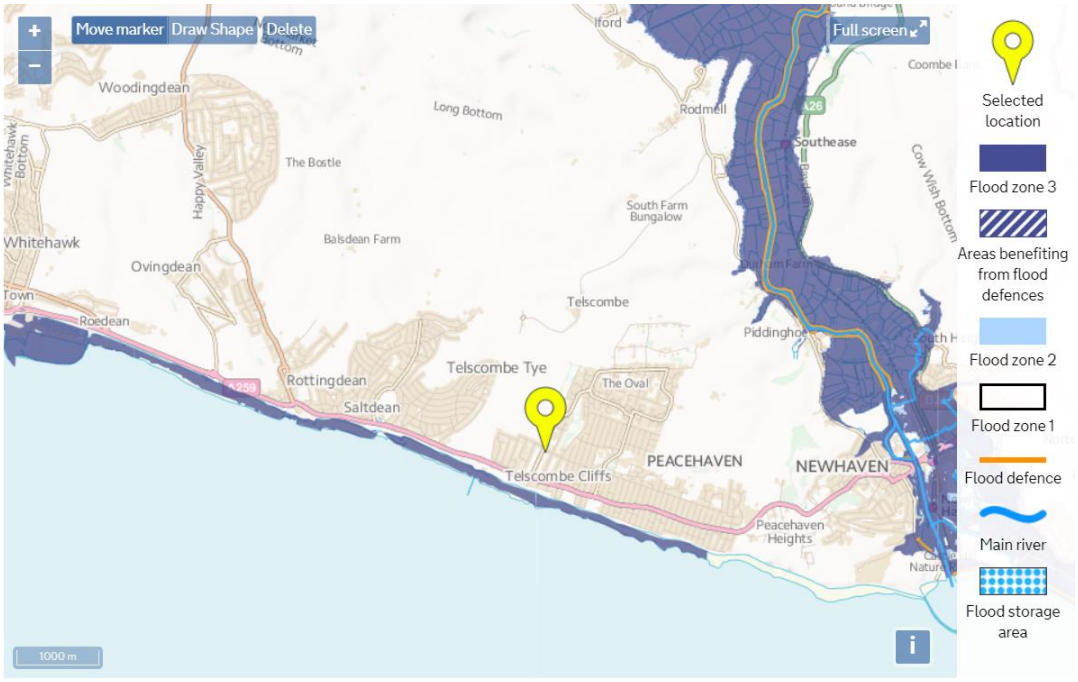


Figure 4.3: Fluvial flood risk in the Neighbourhood Plan area[47]

4.26 **Figure 4.4** shows surface water flooding in the Neighbourhood Plan area. There are several areas of Peacehaven and Telscombe which have a medium-high surface water flood risk, primarily impacting the local road network. This includes sections of South Coast Road, Telscombe Cliffs, Saltdean, Banning's Bottom, Buckhurst Road, Cliff Gardens, Ashington Gardens, The Oval, View Road, Firle Road, and at Peacehaven Sewage Treatment Works.

Figure 4.4: Surface water flood risk within the Neighbourhood Plan area[48]

[47] GOV UK (2020): 'Flood Map for Planning', [online] available to access via: https://flood-map-for-planning.service.gov.uk/
[48] GOV UK (2020): 'Flood Map for Planning', [online] available to access via: https://flood-warning-information.service.gov.uk/long-term-flood-risk/map

4.27 Lewes District Council is part of the Sussex Flow Initiative (SFI)[49], which is "*a Natural Flood Management (NFM) project working with and restoring natural processes to reduce flood risk within the River Ouse catchment, in Sussex*." As part of this initiative, the Council has implemented NFM works across the District, including ditch blocking, cross-slope hedge planting, riparian tree planting, and restoring wetland meadows. Peacehaven and Telscombe are part of the River Ouse Catchment (as shown in **Figure 4.5** below) and is likely to benefit from a number of these projects.

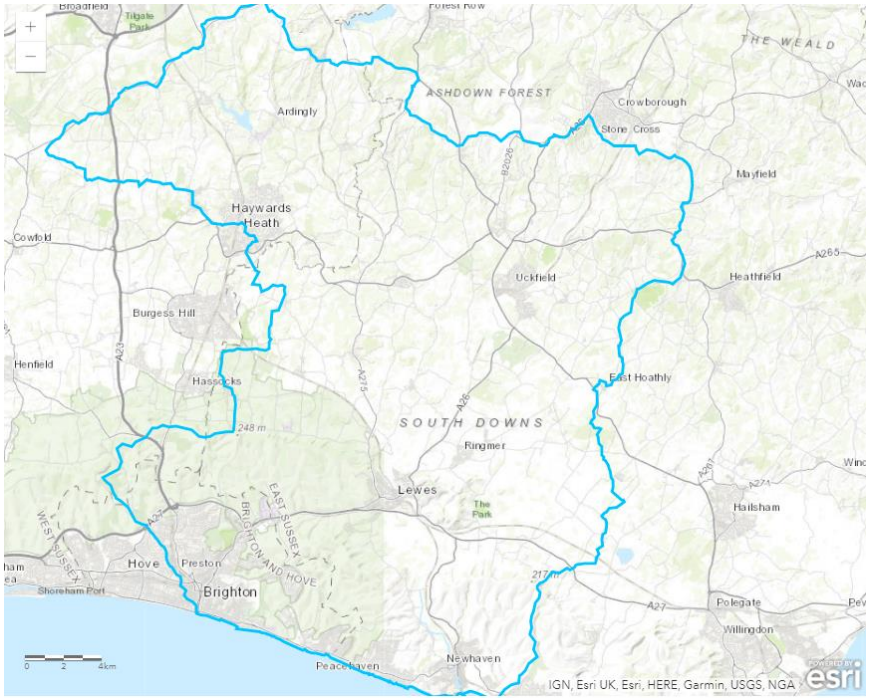


Figure 4.5 River Ouse Catchment area

Summary of Future Baseline

4.28 Climate change has the potential to increase the occurrence of extreme weather events in the Neighbourhood Plan area. This is likely to increase the risks associated with climate change, with an increased need for resilience and adaptation. Specifically, new development areas have the potential to increase flood risk through factors such as changing surface and ground water flows, overloading existing inputs to the drainage and wastewater networks or increasing the number of residents exposed to areas of existing flood risk.

4.29 Implementation of sustainable urban drainage systems (SuDS) could help reduce the risk from surface water runoff, though it will continue to be important that new development avoids introducing large new areas of non-permeable hardstanding wherever possible.

4.30 In terms of climate change contribution, per capita greenhouse gas emissions generated in the Neighbourhood Plan area may continue to decrease with wider adoption of energy efficiency measures, renewable energy production and new technologies, including electric cars. However, increases in the built footprint of the Neighbourhood Plan area would contribute to increases in the absolute levels of greenhouse gas emissions.

Key Sustainability Issues

- Source data from the Department of Energy and Climate Change suggests that Lewes District has observed a 39.9% reduction in total emissions per capita since 2005, lower than the totals for East Sussex (40.0%), the South East (41.3%) and England (41.1%).

[49] Sussex Flow Initiative - The River Ouse Catchment [online] available to access via: http://www.sussexflowinitiative.org/ouse-catchment.html

- Lewes District Council declared a climate emergency in 2019, and has resolved to support local authorities (and, by extension, Neighbourhood groups) to help tackle climate change through plan-making where possible.
- The Neighbourhood Plan should seek to maximise opportunities to support actions in tackling climate change. This may include through encouraging sustainable transport technologies, such as the use of EVs, and through the use of sustainable drainage systems.
- The transportation sector is the second largest source of emissions within Lewes District, contributing 37% of the district's total emissions.
- Areas of land within Flood Zone 3 are broadly confined to the coastal boundary of the Neighbourhood Plan area. Future growth and development should be directed away from the high-risk areas.
- There are several areas of Peacehaven and Telscombe which have a medium-high surface water flood risk, primarily the local road network. This includes sections of South Coast Road, Telscombe Cliffs, Saltdean, Banning's Bottom, Buckhurst Road, Cliff Gardens, Ashington Gardens, The Oval, View Road, Firle Road, and at Peacehaven Sewage Treatment Works.
- Peacehaven and Telscombe are located within proximity to the Brighton to Newhaven Cliffs. The cliff-edge is particularly vulnerable to erosion, both at the base and at the cliff-face. Climate change impacts have the potential to increase the risk of erosion, with more frequent rainfall events and intense storms speeding the weathering process.

What are the SEA objectives and appraisal questions for the Climate Change SEA theme?

SEA objective	Assessment Questions
Reduce the contribution to climate change made by activities within the Neighbourhood Plan area	Will the option/proposal help to: • Reduce the number of journeys made? • Reduce the need to travel? • Promote the use of sustainable modes of transport, including walking, cycling and public transport? • Increase the number of new developments meeting or exceeding sustainable design criteria? • Generate energy from low or zero carbon sources? • Reduce energy consumption from non-renewable resources?
Support the resilience of the Neighbourhood Plan area to the potential effects of climate change, including flooding	Will the option/proposal help to: • Ensure that inappropriate development does not take place in areas at higher risk of fluvial, groundwater and surface water flooding, taking into account the likely future effects of climate change? • Improve and extend green infrastructure networks in the Neighbourhood Plan area to support adaptation to the potential effects of climate change? • Sustainably manage water run-off, reducing surface water runoff (either within the Neighbourhood Plan area or downstream)? • Ensure the potential risks associated with climate change are considered through new development in the Neighbourhood Plan area? • Encourage the use of sustainable drainage techniques through new infrastructure provision?

5. Landscape

Focus of Theme

- Nationally protected landscapes
- Landscape, townscape and villagescape character and quality
- Designated and non-designated sites and areas
- Visual amenity

Policy Context

5.1 The European Landscape Convention[50] of the Council of Europe promotes the protection, management and planning of the landscapes and organises international co-operation on landscape issues. The convention was adopted in October 2000 and is the first international treaty to be exclusively concerned with all dimensions of European landscapes.

5.2 Key messages from the National Planning Policy Framework (NPPF) include:

- *'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty […]. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited.'*
- *Strategic policies should set out an overall strategy making provision for 'conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure.'*
- *Planning policies and decisions should ensure that developments 'are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation of change (such as increased densities).'*
- *'Planning policies and decisions should contribute to and enhance the natural and local environment by:*
- *protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils*
- *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; and*
- *remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.'*

5.3 The policies contained within Chapter 2 'Recovering nature and enhancing the beauty of landscapes' and Goal 6 'Enhanced beauty, heritage and engagement with the natural environment' of the Government's ''A Green Future: Our 25 Year Plan to Improve the Environment' directly relates to the Landscape SEA theme.

5.4 As listed within the South Downs National Park Partnership Management Plan, the general outcomes for conserving and enhancing this nationally protected landscape over the next five years (2020-2025) are as follows:

- Outcome 1: Landscape and Natural Beauty;
- Outcome 2: Increasing Resilience;

[50] Council of Europe (2000): 'European Landscape Convention', [online] available to access via: https://www.coe.int/en/web/landscape

- Outcome 3: Habitats and Species;
- Outcome 4: Arts and Heritage;
- Outcome 5: Outstanding Experiences;
- Outcome 6: Lifelong Learning;
- Outcome 7: Health and Wellbeing;
- Outcome 8: Creating Custodians;
- Outcome 9: Great Places to Live; and
- Outcome 10: Great Places to Work.

5.5 At the local level, the following policies within the Lewes Core Strategy: Local Plan Part 1 directly relate to the Landscape theme:

- Core Policy 8: Green Infrastructure;
- Core Policy 10: Natural Environment and Landscape; and
- Core Policy 11: Built and Historic Environment & Design.

5.6 Additionally, the following policies within the Lewes Local Plan Part 2: Site Allocations and Development Management Policies directly relate to the Landscape theme:

- Policy DM14: Multi-Functional Green Infrastructure;
- Policy DM25: Design;
- Policy DM27: Landscape Design; and
- Policy DM34: Areas of Established Character.

Baseline Summary

Summary of Current Baseline

Nationally protected landscapes

5.7 Most of the western area of the Neighbourhood Plan area (including most of Telscombe Parish) is within the boundaries of the South Downs National Park (SDNP). A small area of land within the north western section of Peacehaven Parish is also within the SDNP.

5.8 Designated in 2009, the SDNP is one of England's newest national parks, and covers an area of approximately 1,653 km^2. The park contains a "rich mosaic of habitats", including ancient woodland, heathland ridges, river valleys, chalk cliffs and farmland[51].

5.9 The South Downs National Park Authority highlights the following as the defined special qualities of the National Park:

- Diverse, inspirational landscapes and breath-taking views;
- A rich variety of wildlife and habitats including rare and internationally important species;
- Tranquil and un-spoilt places;
- An environment shaped by centuries of farming and embracing new enterprise;
- Great opportunities for recreational activities and learning experiences;
- Well-conserved historical features and a rich cultural heritage; and
- Distinctive towns and villages, and communities with real pride in their area.

5.10 The Neighbourhood Plan area is not within or within proximity to an Area of Outstanding Natural Beauty (AONB) or any Green Belt land.

[51] South Downs National Park Authority (2020) 'South Downs National Park Partnership Management Plan 2020-2025', [online] available at: <https://www.southdowns.gov.uk/partnership-management-plan/>

National Character Areas

5.11 National Character Areas (NCAs) are landscape areas which share similar characteristics, following natural lines in the landscape rather than administrative boundaries. Developed by Natural England, NCA profiles describe the natural and cultural features that shape each of these landscapes, providing a broad context to their character. In this respect, the Neighbourhood Plan area is within the 'South Downs' NCA, defined by a prominent ridge of chalk that stretches from Winchester in the west to Eastbourne and the East Sussex coastline in the east. The NCA meets the sea in the distinctive chalk cliffs of Beachy Head and the Seven Sisters, and 90% of the NCA falls within the South Downs National Park. Completed by Natural England in March 2015, the NCA profile[52] contains four Statements of Environmental Opportunity (SEO) for the South Downs along with one additional opportunity, as follows:

- SEO 1: Plan for an expansion of species-rich chalk grassland and other semi-natural habitats and manage and enhance other existing chalk habitats for wildlife connectivity, reinforcement of the distinctive landscape character, and improvement to water resource management.
- SEO 2: Manage, expand where appropriate and enhance the downland farmed landscape, the arable mixed farmed landscape of the dip slope and the broadleaved woodland cover, conserving wildlife habitats, contributing to food provision, maintaining a distinct yet evolving landscape pattern, improving water quality and providing local sources of renewable fuels.
- SEO 3: Conserve and promote the South Downs' rich historic environment, its unique geodiversity and national and local geological sites for the contribution they make to cultural heritage, biodiversity and landscape. Maintain and enhance quality of access, including via the South Downs Way National Trail, providing interpretation to enhance educational and recreational opportunities.
- SEO 4: Manage, enhance and integrate recreational opportunities and public enjoyment with conservation of the natural and historic environment, a productive landscape and tranquillity, reflecting the ambitions of the South Downs National Park.
- Additional Opportunity 1: Plan for the creation of a green infrastructure framework outside the South Downs National Park that could provide a setting for the major urban areas along the south coast while protecting the tranquillity and openness of the adjacent downs that fall within the National Park itself.

Landscape, townscape and villagescape character

5.12 Landscape, townscape and villagescape character play an important part in understanding the relationship between people and place, identifying recognisable and distinct patterns in the landscape which make one area different from another. Landscape, townscape and villagescape character can assist in the assessment of the likely significance of effects of change resulting from development and the value of the local area, both in visual and amenity terms. In this respect, the Design Guide for the emerging Peacehaven and Telscombe Neighbourhood Plan classifies the Neighbourhood Plan area into eight local character areas, shown in **Figure 5.1** (overleaf). A description of each local character area is provided below:

Coastal Plotlands

- Grid layout with perimeter blocks and permeable streets.
- Plots and grid orientated to run parallel and perpendicular to the coast line.
- Dwellings along the cliff edge face the south allowing maximum sea views.
- Consists of predominantly traditional one-storey bungalows.

Coastal Road

- The A259 acts as a gateway to Peacehaven and a through route to Brighton and Newhaven.
- Along this road is where the highest concentration of taller buildings can be found.

[52] Natural England (2015): 'NE432: NCA Profile 125: South Downs' [online] available to access via: http://publications.naturalengland.org.uk/publication/7433354?category=587130

- Some dwellings are embedded in the landscape with entrances lower than ground level.
- There is a mix of residential housing, flats and apartments for elderly people, as well as some scattered commercial units.

Plotlands

- Grid layout with perimeter blocks.
- Vehicular access restricted as not all roads are connected to the A259 but there is pedestrian access.
- Mixture of bungalows and two-storey houses, many standing on a large plot that would have been sub-divided over time.
- Mixture of materials and no uniform style owing to the historical self-build nature of the buildings.

Meridian Centre

- The Meridian Centre and surrounding buildings make up the town centre, providing retail and community facilities.
- Highly accessible for vehicles with plenty of ground level car parking.
- The area is less legible for pedestrians due to the dominance of the car and inward looking nature of the Meridian Centre.

North Peacehaven

- The layout is made up of multiple cul-de-sacs leading off distributor roads.
- This area has predominantly two-storey houses.
- There is some new development in this area which varies in style, materials and in the quality of the finishing details.

South Downs Fringe

- This area provides a more rural setting and is surrounded on three sites by the South Downs National Park.
- This is a low density area with few scattered houses along two roads.
- The dwellings vary in form and massing but are generally set quite far back from the road allowing greater privacy.

East Saltdean

- East Saltdean consists of long curved streets which form a permeable structure.
- Similar to The Plotlands, this area consists of bungalows and two-storey houses.

Telscombe Village

- Telscombe Village is the oldest section within the Neighbourhood Plan area and consists of a range of historic buildings.
- The village is remoted and not very accessible, with only one road in and out.
- The houses are clustered together along the main road with some of the building lines flush against the road.

Figure 5.1: Local character areas within Peacehaven and Telscombe

Landscape capacity

5.13 Completed to contribute to the evidence base for the Lewes Local Plan, the aim of the Landscape Capacity Study (LCS)[53] was to consider the capacity of settlements across the district with a view to informing decision making. For the purposes of the LCS, the areas surrounding the existing built-up areas within Peacehaven and Telscombe were classified into six landscape character areas, shown below in **Figure 5.2**. The LCS findings are summarised in **Table 5.1** overleaf.

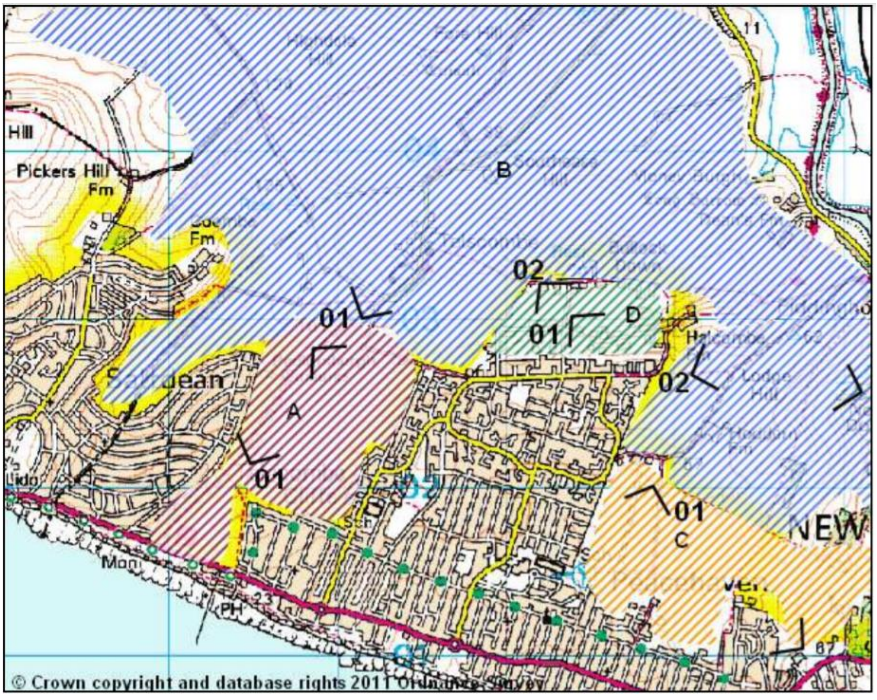


Figure 5.2: Defined landscape character areas for the purposes of the LCS

[53] Lewes District Council (2012): 'Landscape Capacity Study' [online] available to access via: https://www.lewes-eastbourne.gov.uk/planning-policy/lewes-background-reports/?assetdetb15f5c56-9bf9-4867-b307-cdbef931760d=258732&p=6

Table 5.1: Summary of LCS findings for Peacehaven and Telscombe

Character Area	Landscape Value	Sensitivity to Change	Visual Sensitivity	Landscape capacity
A01: Telscombe Tye	Medium / High	High	High	**NONE**
B01: Telscombe Village and land to the south	High	High	High	**NONE**
B02: Downland east of Peacehaven	High	High	High	**NONE**
C01: Area around Lower Hoddern Farm	Low / Medium	High	High	**LOW / MEDIUM**
D01: Valley Road area	Medium	Moderate	High	**LOW / MEDIUM**
D02: Land north west of Valley Road	High	High	High	**NEGLIGIBLE / LOW**

5.14 Based on the results of the LCS, most of the undeveloped areas surrounding Peacehaven and Telscombe have limited capacity to accommodate new development areas. However, character areas C01 'Area around Lower Hoddern Farm' and D01 'Valley Road area' have a low / medium capacity. These two areas are located within the northern and eastern sections of Peacehaven Parish.

Tree preservation orders

5.15 Implemented by local planning authorities, Tree Preservation Orders (TPOs) are designated to protect specific trees, groups of trees or woodlands in the interests of their amenity value. When considering 'amenity; the local planning authority will likely take into consideration the following criteria[54]:

- Visibility: the extent to which the trees or woodlands can be seen by the public; and
- Individual, collective and wider impact: considering the importance of the trees or woodlands in relation to their cultural or historic value, contribution to and relationship with the landscape and/or their contribution to the character or appearance of a conservation area.

5.16 In this context, Lewes District Council have designated numerous TPOs in the interest of their amenity value, including within Telscombe village.

Visual amenity

5.17 It is useful to note that the views across the parish are also an important consideration in the planning process as the scale, height and mass of development can ultimately impact important views if they are not considered and assessed through the process. Changes, such as development and landscape change, can see these views degraded overtime.

5.18 This includes locally important views of the Brighton to Newhaven chalk cliffs which stretch along the coastline of the Neighbourhood Plan area. Approximately 3km to the east, the cliffs between Seaford and Eastbourne are within the boundaries of the Seven Sisters Country Park and part of the Sussex Heritage Coast[55]. There are also some longer views to the South Downs National Park to the north east and to the north west of the Neighbourhood Plan area.

[54] GOV.UK (2014): 'Tree Preservation Orders – General', [online] available to access via: https://www.gov.uk/guidance/tree-preservation-orders-and-trees-in-conservation-areas
[55] South Downs National Park Authority (2020): 'Visit Seven Sisters Country Park' [online] available to access via: https://www.southdowns.gov.uk/seven-sisters-country-park/

Summary of Future Baseline

5.19 New development has the potential to lead to incremental but small changes in landscape, townscape and villagescape character and quality in and around the Neighbourhood Plan area. This includes from the loss of landscape features and areas with an important visual amenity value.

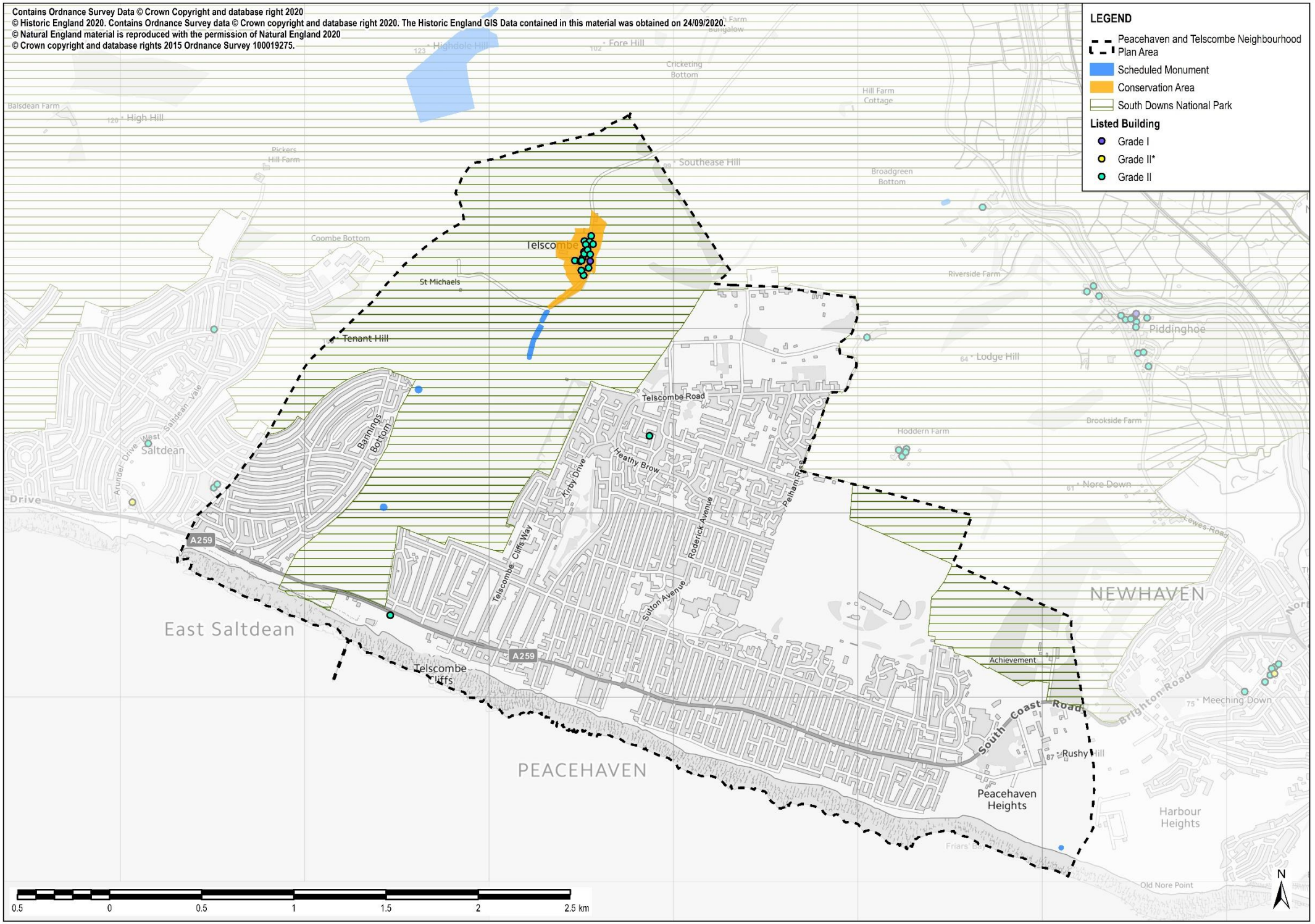
5.20 In the absence of the Neighbourhood Plan, inappropriate levels of development within the open countryside could negatively impact upon the landscape features which contribute to the distinctive character and setting of the South Downs National Park and the Neighbourhood Plan area.

Key Sustainability Issues

- Most of the western area of the Neighbourhood Plan area (including most of Telscombe Parish) is within the boundaries of the South Downs National Park (SDNP). A small area of land within the north western section of Peacehaven Parish is also within the SDNP.
- The Neighbourhood Plan area is within the South Downs NCA. The NCA meets the sea in the distinctive chalk cliffs of Beachy Head and the Seven Sisters, and 90% of the NCA falls within the South Downs National Park. The NCA profile for this landscape details four statements of environmental opportunity and one additional opportunity.
- The Design Guide for the emerging Peacehaven and Telscombe Neighbourhood Plan classifies the Neighbourhood Plan area into eight local character areas. New development areas should safeguard and positively contribute to the distinctiveness of these areas.
- Based on the results of the Landscape Capacity Study, most of the undeveloped areas surrounding Peacehaven and Telscombe have limited capacity to accommodate new development areas.
- Lewes District Council have designated numerous TPOs in the interest of their amenity value, including within Telscombe village.
- Locally important viewpoints include of the Brighton to Newhaven chalk cliffs which stretch along the coastline of the Neighbourhood Plan area. There are also some longer views to the South Downs National Park to the north east and to the north west.

What are the SEA objectives and appraisal questions for the Landscape SEA theme?

SEA objective	Assessment Questions
Protect and enhance the character and quality of landscapes, townscapes and villagescapes.	Will the option/proposal help to: • Conserve and enhance the special qualities of the South Downs National Park and the Neighbourhood Plan area? • Conserve and enhance locally important landscape, townscape and villagescape features within the Neighbourhood Plan area? • Conserve and enhance local diversity and character? • Protect and enhance locally important viewpoints which contribute to the unique sense of place and visual amenity of the Neighbourhood Plan area?



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6. Historic Environment

Focus of Theme

- Designated and non-designated heritage assets
- Setting, special qualities and significance of heritage assets
- Locally important heritage features
- Historic character of the Neighbourhood Plan area

Policy Context

6.1 Key messages from the National Planning Policy Framework (NPPF) include:

- Heritage assets should be recognised as an *'irreplaceable resource'* that should be conserved in a *'manner appropriate to their significance',* taking account of *'the wider social, cultural, economic and environmental benefits'* of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness.
- Plans should set out a *'positive strategy'* for the *'conservation and enjoyment of the historic environment'*, including those heritage assets that are most at risk.
- *'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss of less than substantial harm to its significance.'*

6.2 The policies contained within Chapter 2 'Recovering nature and enhancing the beauty of landscapes' and Goal 6 'Enhanced beauty, heritage and engagement with the natural environment' of the Government's 'A Green Future: Our 25 Year Plan to Improve the Environment' directly relates to the Historic Environment SEA theme.

6.3 The Government's Statement on the Historic Environment for England[56] sets out its vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life.

6.4 Historic England is the statutory body that helps people care for, enjoy and celebrate England's spectacular historic environment. Guidance and advice notes provide essential information for local planning authorities, neighbourhood groups, developers, consultants, landowners and other interested parties on historic environment considerations, and are regularly reviewed and updated in light of legislative changes. The following guidance and advice notes are particularly relevant and should be read in conjunction with the others.

6.5 Conservation Area Designation, Appraisal and Management: Historic England Advice Note 1 – Second Edition (February 2019)[57] outlines ways to manage change that conserves and enhances historic areas in order to positively contribute to sustainable development. Principally, the advice note emphasises the importance of:

- Understanding the different types of special architectural and historic interest which underpin the designations; and
- Recognising the value of implementing controls through the appraisal and/or management plan which positively contribute to the significance and value of conservation areas.

[56] HM Government (2010): 'The Government's Statement on the Historic Environment for England', [online] available to access via: <http://webarchive.nationalarchives.gov.uk/+/http://www.culture.gov.uk/reference_library/publications/6763.aspx>
[57] Historic England (2019): 'Conservation Area Designation, Appraisal and Management: Advice Note 1 (second edition)', [online] available to access via: <https://historicengland.org.uk/images-books/publications/conservation-area-appraisal-designation-management-advice-note-1/>

6.6 Sustainability Appraisal (SA) and Strategic Environment Assessment (SEA): Historic England Advice Note 8 (December 2016)[58] provides support to all stakeholders involved in assessing the effects of certain plans and programmes on the historic environment. It offers advice on heritage considerations during each stage of the SA/SEA process and helps to establish the basis for robust and comprehensive assessments.

6.7 Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2nd Edition) (December 2017)[59] provides general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated, as well as advice on how views can contribute to setting. Specifically, Part 2 of the advice note outlines a five stepped approach to conducting a broad assessment of setting:

- Step 1: Identify which heritage assets and their settings are affected;
- Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated;
- Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it;
- Step 4: Explore ways to maximise enhancement and avoid or minimise harm; and
- Step 5: Make and document the decision and monitor outcomes.

6.8 Neighbourhood Planning and the Historic Environment: Historic England Advice Note 11 (October 2018)[60] outlines the importance of considering the historic environment whilst preparing the plan (section 1), which culminates in a checklist of relevant of issues to consider, followed by an overview of what this means in terms of evidence gathering (section 2). Sections 3 to 5 of the advice note focus on how to translate evidence into policy, understand the SEA process and Historic England's role in neighbourhood planning.

6.9 Historic England Advice Note 7 'Local Heritage Listing'[61] supports local authorities and communities to introduce a local list in their area, encouraging a more consistent approach to the identification and management of local heritage assets across England. Local lists play an essential role in building and reinforcing a sense of local character and distinctiveness in the historic environment. They enable the significance of any building or site on the list (in its own right and as a contributor to the local planning authority's wider strategic planning objectives), to be better taken into account in planning applications affecting the building or site or its setting.

6.10 At the local level, the following policies within the Lewes Core Strategy: Local Plan Part 1 directly relate to the Historic Environment theme:

- Core Policy 4: Economic Development & Regeneration;
- Core Policy 10: Natural Environment and Landscape; and
- Core Policy 11: Built and Historic Environment & Design.

6.11 Additionally, the following policies within the Lewes Local Plan Part 2: Site Allocations and Development Management Policies directly relate to the Historic Environment theme:

- Policy DM25: Design; and
- Policy DM33: Heritage Assets.

[58] Historic England (2016): 'SA and SEA: Advice Note 8' [online] available to access via: https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/
[59] Historic England (2017): 'Setting of Heritage Assets: 2nd Edition', [online] available to access via: https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/
[60] Historic England (2018): 'Neighbourhood Planning and the Historic Environment', [online] available to access via: https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/
[61] Historic England (2016): 'Local Heritage Listing: Advice Note 7', [online] https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/

Baseline Summary

Summary of Current Baseline

Historic evolution of Peacehaven and Telscombe

Peacehaven

6.12 The town has been established north and south of the pre-existing and slightly sinuous South Coast Road from Newhaven to Brighton (A259). Until the development of the Meridian Centre to the north in 1979, nearly all commercial activity was concentrated on this road. The town lies at the southern (cliff) edge of the South Downs, so that the entire area is underlain by the relatively pure limestones of, from youngest to oldest, the Tarrant and Newhaven Chalk Formations (Upper Cretaceous). The uppermost solid geology of much of the northern part of the town, however, is the sandstone and mudstone (commonly clay) of the Lambeth Group, being Tertiary (Palaeocene) irregular beds laid down on the eroded chalk.

6.13 The development of Peacehaven on agricultural land followed precedents for speculative seaside resorts all along the south coast and, more specifically, immediately west of the site at Telscombe Cliffs. Here, the Cavendish Land Company had begun to develop a seaside resort from 1901. This had not advanced beyond a handful of houses in 1914-15. However, Charles Neville began to purchase land for what was to become Peacehaven, and in due course he acquired Telscombe Cliffs too. Today the junction of the two cliff-top developments is marked only by the sudden end of Peacehaven's gridded street plan.

6.14 The advent of the First World War prevented any significant work at Peacehaven. The pylons of 1916 that mark the eastern and western limits of the Peacehaven estate are the only survivors of this period: two survive at the east end of South Coast Road, just east of Cornwall Avenue, and one survives at the west end, just west of Lincoln Avenue South.

6.15 Amongst the scattered houses of pre-war Peacehaven, there were attempts to create public and commercial features more consistent with the burgeoning seaside resort of Neville"s imagination. There was little substantial about many of these more public buildings. However, most are now long gone, like the corrugated-iron school and swimming pool, and many, such as the surviving Roman Catholic church, are extremely modest and impermanent construction.

6.16 During the controversial inter-war decades of the initial colonization of Peacehaven, the local authority had been reluctant to do its duty with regard to public health (mains drainage for such a new widespread and low-density settlement was evidently going to be a huge draw on public funding) and was frustrated by its lack of powers. Following the introduction of the Town and Country Planning Act, action thereafter was more rapid. This included the compulsory purchase of vacant plots that had been used for agriculture during the Second World War, and implementation of a strategy for consolidation of the scattered township through phased release of blocks of land for development. In the course of this regulated consolidation, the mass of vacant plots of that existed throughout Peacehaven at the outbreak of the Second World War has now gone[62].

Telscombe

6.17 Telscombe village is set unobtrusively in a valley within stunning downland. The small village remains surprisingly remote and isolated given its proximity to the urban coastal development at Saltdean, Telscombe Cliffs and Peacehaven. The settlement is linear in form running north-south and is accessible along a narrow country lane which passes through the village. The buildings are tightly arranged around the road, which gives the village a compact feel.

6.18 The presence of the farm and proliferation of barns throughout the village are evidence of the key role agriculture played in shaping the settlement. However, the prevalence of barrows and tumuli on the surrounding Downland bear witness to man's occupation of this area for

[62] Sussex Extensive Urban Survey (2004): 'Peacehaven Historic Character Assessment Report' [online] available to access via: https://www.westsussex.gov.uk/media/1738/peacehaven_eus_report_maps.pdf

centuries. The network of paths across the Downs focus on the village of Telscombe, which is likely to have provided shelter on the route from the coast to inland settlements.

6.19 The church of St Laurence is the oldest surviving building in the village and would have formed its focus and the reason for the additional development of a rectory and other buildings. However, it would have been the erection of the Manor House and its ancillary and associated buildings which would have represented the principle phase of new building in the settlement. A rectory, several worker's cottages and a small classroom followed later when a sufficient population existed in the village. There was a later phase of building centred on Stud Farm in the late 1800s when Ambrose Gorham (trainer of the 1902 Grand National winner 'Shannon Lass') became the local squire. With the exception of Stud Farm, Ambrose Gorham forbade any significant new development to take place, instead concentrating on consolidating the village's facilities, bringing mains water to the village in 1909, electricity in 1930 and building the Village Hall in 1924.

6.20 Due to the location of the settlement in chalk downland, one of the most common building materials used in the settlement is flint, which is found in surrounding fields. This has in some places been stuccoed (such as at the Manor House), or incorporated with stone dressings (such as in the Church of St. Laurence and the Village Hall), but commonly the flint is used in conjunction with brick dressings (Stud House, the barns and stables, Bank Cottages etc).[63]

Designated heritage assets and areas

6.21 The historic environment is protected through the planning system, via conditions imposed on developers and other mechanisms. Historic England is the statutory consultee for certain categories of listed building consent and all applications for scheduled monument consent.

6.22 An overview of the designated historic environment assets present in the Neighbourhood Plan area is provided below.

Listed buildings

6.23 Listed building are nationally designated buildings which are protected through the Listed Buildings and Conservation Areas Act 1990.[64] The Neighbourhood Plan area contains 18 Grade II listed buildings, one Grade I listed building, namely: 'The Parish Church of St Lawrence' (located in Telscombe)[65]. There are no Grade II* listed buildings within the Neighbourhood Plan area. Notably, 17 out of the 18 Grade II listed buildings are within Telscombe, with most overlapping with the boundaries of the Telscombe Conservation Area.

Scheduled monuments

6.24 The Ancient Monuments and Archaeological Areas Act (1979)[66] allows the investigation, presentation and recording of matters of archaeological or historical interest and makes provision for the regulation of operations or activities which may affect ancient monuments and archaeological areas. Scheduled monuments are nationally designated sites which are protected under the Act. In this regard, there are four scheduled monuments within the Neighbourhood Plan area, including:

- Bowl barrow on Peacehaven Heights, 242m south-west of Warren Court;
- Bowl barrow on Telscombe Tye, 650m south-west of Pedlersburgh;
- Cross dyke on Telscombe Tye; and
- Pedlersburgh: a bowl barrow on Telscombe Tye.

[63] Lewes District Council (2009): 'Telscombe Conservation Area Appraisal' [online] accessible via: http://www.lewes-eastbourne.gov.uk/EasySiteWeb/HandleRequest/_resources/assets/inline/full/0/259020.pdf?IsMSOfficeRedirect=1
[64] Planning (Listed Buildings and Conservation Areas) Act (1990) [online] available at: https://www.legislation.gov.uk/ukpga/1990/9/contents
[65] Historic England (2020): National Heritage List for England', [online] available to access via: https://historicengland.org.uk/listing/the-list/advanced-search
[66] Ancient Monuments and Archaeological Act (1979) [online] available at: https://www.legislation.gov.uk/ukpga/1979/46

Registered historic parks and gardens, and historic battlefields

6.25 Historic England's 'Register of Parks and Gardens of Special Historic Interest in England', established in 1983, currently identifies over 1,600 sites assessed to be of significance. No historic parks and gardens are present in the Neighbourhood Plan area.

6.26 Historic England's Register of Historic Battlefields identifies important English battlefields. Its purpose is to offer them protection through the planning system, and to promote a better understanding of their significance and public enjoyment. No historic battlefields are present in the Neighbourhood Plan area.

Conservation areas

6.27 Conservation areas are designated because of their special architectural and historic interest. Conservation area appraisals are a tool to demonstrate the area's special interest, explaining the reasons for designation and providing a greater understanding and articulation of its character - mentioned within the 'Conservation Area Designation, Appraisal and Management' advice note by Historic England[67].

6.28 In this respect, Telscombe Conservation Area was designated in August 1973 and encompasses the village of Telscombe. Completed in 2009, the Telscombe Conservation Area Appraisal details many features of interest. For example, many of the buildings in the village of Telscombe were erected in the seventeenth and eighteenth centuries, with several later examples from the early nineteenth century. There has been no significant development since that time, hence the village is largely unspoilt, and retains much of its original historic character and appearance. Buildings of character include: Manor House, The Old Rectory, Telscombe Village Club, The Old School House, Stud House and Farm, and the Parish Church of St Laurence (which is the oldest building in the village with Norman origins, and Grade I listed).

6.29 In between these more imposing buildings are many modest attractive cottages, including Manor Cottage, Oak Cottage, Box Tree Cottage, Bank Cottages and White Cottages. The village unit is tied together by the fine flint walls that run throughout. The mature trees, flint walls and open spaces that surround and thread through the village help to identify the settlement and are in marked contrast to the surrounding open downland.

6.30 The Telscombe Conservation Area Appraisal notes that that the village does not contain a great number of features which actively detract from its overall character. Several more recent developments, such as the modern farm buildings at Stud Farm or the houses at Hillview, are either set back from the road and well-screened or are of an appearance that, whilst not actively contributing to the character of the Conservation Area, do not detract from it. However, the northernmost 90 metres of kerbstones around Hillview are concrete, and their replacement with more appropriate materials is encouraged.

Locally important heritage features

6.31 It should be noted that not all the area's historic environment features are subject to statutory designations, and non-designated features comprise a large part of what people have contact with as part of daily life – whether at home, work or leisure. Although not designated, many buildings and areas are of historic interest and are important by local communities. For example, open spaces and key distinctive buildings are likely to have a local historic value.

6.32 Accessed via the Heritage Gateway[68], the East Sussex Historic Environmental Record (HER) identifies the important distinctive structures or features that positively contribute to the local distinctiveness and sense of place of the Neighbourhood Plan area. Following a high-level review of the HER, there are 99 records within Peacehaven and 37 records within Telscombe.

6.33 During the subsequent stages of the SEA process, the East Sussex HER will be reviewed in greater detail to determine which heritage features are likely to be impacted by the preferred

[67] Historic England (2016): 'Conservation Area Designation, Appraisal and Management Advice Note 1', [online] available to access via: https://www.historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/
[68] Heritage Gateway (2020): 'Detailed Search' [online database] available to access via: https://www.heritagegateway.org.uk/gateway/

development strategy within the Neighbourhood Plan (and reasonable alternatives). These heritage considerations (alongside any suggested mitigation measures or recommendations) will be presented in the Environmental Report accompanying the Neighbourhood Plan at Regulation 14 consultation.

Heritage at risk

6.34 Since 2008, Historic England has released an annual Heritage at Risk Register. The Heritage at Risk Register highlights the Grade I and Grade II* listed buildings, scheduled monuments, historic parks and gardens, registered battlefields, wreck sites and conservation areas deemed to be 'at risk'. According to the 2020 Heritage at Risk Register for South East England[69], there are two heritage assets at risk within Lewes District, neither of which are within the boundaries of the Neighbourhood Plan area.

6.35 It is important to recognise that the Heritage at Risk Registers for areas outside of London do not contain information about the status of Grade II listed buildings. As such, it is currently not possible to determine whether any of the Grade II listed buildings within the Neighbourhood Plan area are at risk.

Summary of Future Baseline

6.36 New development areas in the Neighbourhood Plan area have the potential to impact on the fabric and setting of heritage assets; for example, through inappropriate design and layout, and increasing the impacts of traffic within conservation areas. It should be noted, however, that existing historic environment designations offer a degree of protection to heritage assets and their settings.

6.37 Alongside, new development need not be harmful to the significance of a heritage asset, and in the context of the Neighbourhood Plan area there may be opportunity for new development to enhance the historic setting of the parish's settlements, support historic landscape character and better reveal assets' heritage significance.

Key Sustainability Issues

- The Neighbourhood Plan area contains 18 Grade II listed buildings and one Grade I listed building, namely: 'The Parish Church of St Lawrence' (located in Telscombe). Notably, 17 out of the 18 Grade II listed buildings are within Telscombe, with most overlapping with the boundaries of the Telscombe Conservation Area.
- It is currently not possible to determine whether any of the Grade II listed buildings within the Neighbourhood Plan area are at risk.
- There are four scheduled monuments within the Neighbourhood Plan area, including: Bowl barrow on Peacehaven Heights, 242m south-west of Warren Court; Bowl barrow on Telscombe Tye, 650m south-west of Pedlersburgh; Cross dyke on Telscombe Tye; and Pedlersburgh: a bowl barrow on Telscombe Tye.
- Telscombe Conservation Area was designated in August 1973 and encompasses the village of Telscombe. Important buildings which contribute to the special qualities of the Telscombe Conservation Area include: Manor House, The Old Rectory, Telscombe Village Club, The Old School House, Stud House and Farm, and the Parish Church of St Laurence.
- In between the more imposing buildings of the Telscombe Conservation Area are many modest attractive cottages, including Manor Cottage, Oak Cottage, Box Tree Cottage, Bank Cottages and White Cottages. The mature trees, flint walls and open spaces that surround and thread through the village help to identify the settlement.
- The Telscombe Conservation Area Appraisal notes that that the village does not contain a great number of features which actively detract from its overall character. However, the northernmost 90 metres of kerbstones around Hillview are concrete, and their replacement with more appropriate materials is encouraged.

[69] Historic England (2020): 'Heritage at Risk Register: London and South East' [online] available to access via: https://historicengland.org.uk/images-books/publications/har-2020-registers/

- Following a high-level review of the East Sussex HER, there are 99 records within Peacehaven and 37 records within Telscombe. During the subsequent stages of the SEA process, the East Sussex HER will be reviewed in greater detail to determine which heritage features are likely to be impacted by the preferred development strategy within the Neighbourhood Plan.

What are the SEA objectives and appraisal questions for the Historic Environment SEA theme?

SEA objective	Assessment Questions
Protect, conserve and enhance heritage assets within the Neighbourhood Plan area	Will the option/proposal help to: • Conserve and enhance the significance of buildings and structures of architectural or historic interest, both designated and non-designated, and their setting? • Conserve and enhance the special interest, character and appearance of locally important features and their settings? • Guide development proposals to secure remediation of issues identified as affecting the conservation areas and prevent cumulative impacts? • Support the integrity and the historic setting of sites of archaeological or historic interest recorded on the East Sussex HER? • Support access to, interpretation and understanding of the historic evolution and character of the environment? • Conserve and enhance archaeological remains, including historic landscapes?

7. Land, Soil and Water Resources

Focus of Theme

- Quality of agricultural land
- Water resources and water quality
- Mineral safeguarding areas

Policy Context

7.1 The EU's Soil Thematic Strategy[70] presents a strategy for protecting soil resources in Europe. The main aim of the strategy is to minimise soil degradation and limit associated detrimental effects linked to water quality and quantity, human health, climate change, biodiversity, and food safety.

7.2 Adopted in October 2000, the purpose of the EU Water Framework Directive (WFD) is to establish a framework for the protection of inland surface waters, transitional waters, coastal waters and groundwater, driving a catchment-based approach to water management. In England and Wales there are 100 water catchments and it is Defra's intention is to establish a 'framework for integrated catchment management' across England. The Environment Agency is establishing 'Significant Water Management Issues' and recently presented second River Basin Management Plans to ministers. The plans seek to deliver the objectives of the WFD namely:

- Enhance the status and prevent the further deterioration of aquatic ecosystems and associated wetlands which depend on aquatic ecosystems;
- Promote the sustainable use of water;
- Reduce the pollution of water, especially by 'priority' and 'priority hazardous' substances;
- Ensure the progressive reduction of groundwater pollution; and
- Contribute to achieving 'good' water quality status for as many waterbodies as possible by 2027.

7.3 Key messages from the NPPF include:

- *'Planning policies and decisions should contribute to and enhance the natural and local environment by:*
  - *i. protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils; and*
  - *ii. recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.'*
- Prevent new or existing development from being *'adversely affected' by the presence of 'unacceptable levels' of soil pollution or land instability and be willing to remediate and mitigate 'despoiled, degraded, derelict, contaminated and unstable land, where appropriate'.*
- *'Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.'*

[70] European Commission (2006): 'Soil Thematic Policy', [online] available to access via: http://ec.europa.eu/environment/soil/index_en.htm

- *'Encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains.'*
- Planning policies and decisions should 'give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs', and 'promote and support the development of under-utilised land and buildings.'
- Taking a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for water supply.
- Prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution.
- The government has produced a separate plan that specifically deals with planning policy in relation to waste management; this should be read in conjunction with the NPPF.

7.4 Along with the policies contained within Chapter 1 'Using and managing land sustainably' and Chapter 4 'Increasing resource efficiency, and reducing pollution and waste', Goal 2 'Clean and plentiful water', Goal 5 'Using resources from nature more sustainably and efficiently' and Goal 8 'Minimising waste' of the Government's 'A Green Future: Our 25 Year Plan to Improve the Environment' directly relates to the Land, Soil and Water Resources SEA theme.

7.5 Other key documents at the national level include Safeguarding our Soils: A Strategy for England[71], which sets out a vision for soil use in England, and the Water White Paper[72], which sets out the Government's vision for a more resilient water sector. It states the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources.

7.6 In terms of waste management, the Government Review of Waste Policy in England[73] recognises that environmental benefits and economic growth can be the result of a more sustainable approach to the use of materials. The National Waste Management Plan[74] provides an analysis of the current waste management situation in England and evaluates how it will support the implementation of the objectives and provisions of the revised Waste Framework Directive[75]. This includes an assessment of the need for new collection schemes, additional waste infrastructure and investment channels, as well as providing general or strategic waste management policies.

7.7 River Basin Management Plans (RBMPs) set out a framework for how all river basin stakeholders, including water companies and local communities, can help improve the quality of the water environment. There are eight RBMPs in England which all have a harmonised plan period of 2015-2021 and are reviewed every five years. Peacehaven and Telscombe fall within the South East River Basin District and the December 2015 Management Plan provides a framework for protecting and enhancing the benefits provided by the water environment[76].

7.8 The waste and minerals planning strategy for East Sussex is set out in a series of documents collectively known as the Waste and Minerals Local Plan. These documents are[77]:

- The Waste and Minerals Plan (adopted February 2013); and
- The Waste and Minerals Sites Plan (adopted February 2017).

[71] Defra (2009): 'Safeguarding our Soils: A strategy for England', [online] available to access via: https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england
[72] Defra (2011): 'Water for life (The Water White Paper)', [online] available to access via: http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf
[73] Defra (2011): 'Government Review of Waste Policy in England', [online] available at: http://www.defra.gov.uk/publications/files/pb13540-waste-policy-review110614.pdf
[74] DEFRA (2013) Waste Management Plan for England [online] available to access via: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/265810/pb14100-waste-management-plan-20131213.pdf
[75] Directive 2008/98/EC
[76] Environment Agency (2015): 'South East River Basin Management Plan', [online] available to access via: https://www.gov.uk/government/collections/river-basin-management-plans-2015
[77] East Sussex County Council (2020) 'Waste and Minerals Local Plan for East Sussex', [online] available to access via: https://www.eastsussex.gov.uk/environment/planning/mineralsandwaste/

7.9 At the local level, the following policies within the Lewes Core Strategy: Local Plan Part 1 directly relate to the Land, Soil and Water Resources theme:

- Core Policy 10: Natural Environment and Landscape.

7.10 Additionally, the following policies within the Lewes Local Plan Part 2: Site Allocations and Development Management Policies directly relate to the Land, Soil and Water Resources theme:

- Policy DM3: Accommodation for Agricultural and Other Rural Workers;
- Policy DM4: Residential Conversions in the Countryside;
- Policy DM5: Replacement Dwellings in the Countryside;
- Policy DM9: Farm Diversification;
- Policy DM19: Protection of Agricultural Land;
- Policy DM20: Pollution Management;
- Policy DM21: Land Contamination; and
- Policy DM22: Water Resources and Water Quality.

Baseline Summary

Summary of Current Baseline

Soil resources

7.11 The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural land' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' (BMV) land and Grades 3b to 5 of poorer quality. In this context, there is a need to avoid loss of higher quality 'best and most versatile' agricultural land.

7.12 In terms of the location of the best and most versatile agricultural land, a detailed classification has not been undertaken for most of the areas of undeveloped land in the Neighbourhood Plan area. The provisional ALC dataset provided by Natural England indicates that the undeveloped areas surrounding Peacehaven and Telscombe are predominantly underlain by areas of Grade 2 and Grade 3 agricultural land. The Neighbourhood Plan area therefore has the potential to contain some of the best and most versatile land for agricultural purposes[78].

7.13 However, in the absence of a detailed ALC assessment it is currently not possible to determine whether the Grade 3 areas can be classified as Grade 3a (i.e. best and most versatile land) or Grade 3b land.

7.14 The results of the 'Predictive Best and Most Versatile (BMV) Land Assessment' for South East England[79] provided by Natural England indicates that most of the undeveloped areas of land in surrounding Peacehaven has a greater than 60% chance of being underlain by BMV agricultural land. There are also some areas of land within Telscombe Parish that have a 20-60% chance of being underlain by BMV agricultural land.

Water resources and quality

7.15 The Neighbourhood Plan area is located within the South East River Basin District, overlapping with the 'Ouse Upper' Operational Catchment. The Environment Agency confirms that 26 waterbodies pass through the catchment area, none of which pass through the Neighbourhood Plan area. The water resources located within and within proximity to the Neighbourhood Plan area are limited to a few isolated dew ponds. The River Ouse passes through the neighbouring settlement of Newhaven (approximately 1km to the east of Peacehaven).

[78] Natural England (2011): 'Regional ALC Classification Map for South East England', [online] available to access via: http://publications.naturalengland.org.uk/publication/141047?category=5954148537204736
[79] Natural England (2017): 'Likelihood of BMV Agricultural Land: Strategic Scale Map for London and the South East', [online] available to access via: http://publications.naturalengland.org.uk/publication/6056482614804480?category=5208993007403008

7.16 As shown on the Environment Agency's Catchment Data Explorer, the most recently completed water quality assessments undertaken in 2019 classifies the 26 waterbodies within the Ouse Upper Operational Catchment as follows[80]:

Table 7.1: Quality of the waterbodies within the Ouse Upper Operational Catchment

	Ecological status or potential					Chemical status	
Number of water bodies	**Bad**	**Poor**	**Moderate**	**Good**	**High**	**Fail**	**Good**
26	**3**	**5**	**18**	**0**	**0**	**26**	**0**

7.17 Reflecting the results in **Table 7.1**, none of the waterbodies within the Ouse Upper Operational Catchment are classified as 'good'. The reasons for not achieving good status (RNAG) for these watercourses are primarily attributed to the water industry sector and the agriculture and rural land management sector.

7.18 The Nitrates Directive (91/676/EEC) requires Member States to identify areas where groundwater have nitrate concentrations of more than 50 mg/l nitrate or are thought to be at risk of nitrate contamination. Areas associated with such groundwater are designated as Nitrate Vulnerable Zones (NVZs) within which, Member States are required to establish Action Programmes to reduce and prevent further nitrate contamination. In this regard, the whole of the Neighbourhood Plan area is within the Sussex Chalk Groundwater NVZ. It is useful to note that as the Neighbourhood Plan is likely to allocate land for residential development and potential employment areas, such uses are not considered to significantly increase the risk of pollution to NVZs.

7.19 Groundwater Source Protection Zones (SPZs) have been defined by the Environment Agency in England and Wales to protect groundwater sources such as wells, boreholes and springs that are used for public drinking water supply. In this respect, the north western section of Telscombe Parish is within a Zone III – Total Catchment SPZ.

Mineral resources

7.20 Mineral resources are defined as natural concentrations of minerals or, in the case of aggregates, bodies of rock that are, or may become, of potential economic interest due to their inherent properties. They make an essential contribution to the country's prosperity and quality of life. Since minerals are a non-renewable resource, minerals safeguarding is the process of ensuring that non-minerals development does not needlessly prevent the future extraction of mineral resources, of local and national importance[81].

7.21 The East Sussex Minerals and Waste Plan outlines areas of mineral sensitivity within the county. In this regard, there are no Mineral Safeguarding Areas or Mineral Consultation Zones within or within proximity to the Neighbourhood Plan area. Regarding waste management, Hoyle Road in Peacehaven is identified as a potential area of opportunity[82].

Summary of Future Baseline

7.22 Future development has the potential to affect water quality through diffuse pollution, wastewater discharges, water run-off, and modification. However, water companies are likely to maintain adequate water supply and wastewater management over the plan period, and the requirements of the Water Framework Directive are likely to lead to continued improvements to water quality within the Neighbourhood Plan area and wider area.

[80] Environment Agency (2020): 'Catchment Data Explorer: Upper Ouse Operational Catchment Summary', [online] available to access via: https://environment.data.gov.uk/catchment-planning/OperationalCatchment/3498/Summary
[81] GOV.UK (2014): 'Minerals Guidance', [online] available to access via: https://www.gov.uk/guidance/minerals
[82] East Sussex County Council (2017): 'Waste and Minerals Sites Plan', [online] available to access via: https://www.eastsussex.gov.uk/environment/planning/mineralsandwaste/

7.23 Due to the likely prevalence of BMV agricultural land within sections of the undeveloped areas of the Neighbourhood Plan area, new developments which are located outside of the settlements will likely lead to losses of higher quality (best and most versatile) agricultural land.

Key Sustainability Issues

- The provisional ALC dataset provided by Natural England indicates that the undeveloped areas surrounding Peacehaven and Telscombe are predominantly underlain by areas of Grade 2 and Grade 3 agricultural land. In the absence of a detailed ALC assessment it is currently not possible to determine whether the Grade 3 areas can be classified as Grade 3a (i.e. best and most versatile land) or Grade 3b land.
- The results of the 'Predictive Best and Most Versatile (BMV) Land Assessment' for South East England provided by Natural England indicates that most of the undeveloped areas of land in surrounding Peacehaven has a greater than 60% chance of being underlain by BMV agricultural land.
- The water resources located within and within proximity to the Neighbourhood Plan area are limited to a few isolated dew ponds.
- The whole of the Neighbourhood Plan area is within the Sussex Chalk Groundwater NVZ, with the north western section of Telscombe Parish within a Zone III – Total Catchment SPZ.
- Reflecting the results of the 2019 water quality assessments undertaken by the Environment Agency, none of the waterbodies within the Ouse Upper Operational Catchment are classified as 'good'. The RNAGs for these watercourses are primarily attributed to the water industry sector and the agriculture and rural land management sector.
- Regarding waste management, Hoyle Road in Peacehaven is identified as a potential area of opportunity within the East Sussex Minerals and Waste Plan.

What are the SEA objectives and appraisal questions for the Land, Soil and Water Resources SEA theme?

SEA objective	Assessment Questions
Ensure the efficient and effective use of land.	Will the option/proposal help to: • Promote the use of previously developed land? • Avoid the development of the best and most versatile agricultural land, which in the parish may comprise Grade 1 to 3a agricultural land? • Protect the integrity of mineral resources?
Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste.	Will the option/proposal help to: • Reduce the amount of waste produced? • Support the minimisation, reuse and recycling of waste? • Maximise opportunities for local management of waste in order to minimise export of waste to areas outside? • Encourage recycling of materials and minimise consumption of resources during construction?
Use and manage water resources in a sustainable manner.	Will the option/proposal help to: • Ensure that there is no deterioration to water quality, whilst supporting improvements consistent with the aims of the River Basin Management Plan? • Protect surface water and groundwater resources? • Minimise water consumption?

8. Population and Community

Focus of Theme

- Population size
- Population density
- Age structure
- Deprivation
- Housing mix and affordability
- Education and skills

Policy Context

8.1 Key messages from the NPPF include:

- One of the three overarching objectives of the NPPF is a social objective to; '*support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing.'*
- To support the Government's objective of significantly boosting the supply of housing, strategic policies *'should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.'*
- The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required and expect it to be met on-site where possible.
- Recognise the important contribution of small and medium sized development sites in meeting housing needs. Local Plans should identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare, and neighbourhood planning groups should also consider the opportunities for allocating small and medium-sized sites.
- In rural areas, planning policies and decisions should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Authorities should consider whether allowing some market housing would facilitate the provision of affordable housing to meet local needs.
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.
- Ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. Places should contain clear and legible pedestrian routes, and high-quality public spaces, which encourage the active and continual use of public areas.
- Ensuring that there is *a 'sufficient choice of school places'* and taking a *'proactive, positive and collaborative approach'* to bringing forward *'development that will widen choice in education'.*

8.2 The 'Ready for Ageing?' report, published by the Select Committee on Public Service and Demographic Change[83] warns that society is underprepared for an ageing population. The report states that *'longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises'*. The report recognises that the supply of specialist housing for the older generation is insufficient for the demand. There is a need for central and local Government, housing associations, and house builders to ensure that these housing needs are better addressed, giving as much priority to promoting an adequate market of social housing for the older generation as is given to the younger generation.

8.3 At the local level, the following policies within the Lewes Core Strategy: Local Plan Part 1 directly relate to the Population and Community theme:

- Core Policy 1: Affordable Housing;
- Core Policy 2: Housing Type, Mix and Density;
- Core Policy 3: Gypsy and Traveller Accommodation;
- Core Policy 4: Economic Development & Regeneration;
- Core Policy 6: Retail and Town Centres; and
- Core Policy 7: Infrastructure.

8.4 Additionally, the following policies within the Lewes Local Plan Part 2: Site Allocations and Development Management Policies directly relate to the Population and Community theme:

- Policy DM1: Planning Boundary;
- Policy DM2: Rural Exception Sites;
- Policy DM8: Residential Sub-Divisions and Shared Housing;
- Policy DM10: Employment Development in the Countryside;
- Policy DM28: Residential Extensions; and
- Policy DM32: Telecommunications Infrastructure.

Baseline Summary

Summary of Current Baseline

Population

8.5 **Table 8.1** shows the change in population between the period of 2001 and 2011. The Neighbourhood Plan area saw an increase in population of approximately 5.9% between this period, broadly in line with growth at the District level (approximately 5.8%), but lower than the South East and England rates of change (both at approximately 7.9%).

Table 8.1: Population change between 2001 and 2011[84]

Population change between 2001 and 2011	Peacehaven and Telscombe	Lewes	South East	England
2001	20,350	92,177	8,000,645	49,138,831
2011	21,544	97,502	8,634,750	53,012,456
% Population change	5.87%	5.78%	7.93%	7.88%

[83] Select Committee on Public Service and Demographic Change (2013): 'Ready for Ageing?', [online] available to access via: <http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/>
[84] ONS (2011) Tables KS001 (2001) and KS101EW (2011)

8.6 Based on mid-2018 population estimates, the total population of the Neighbourhood Plan area has grown to 23,273 residents, a further increase of approximately 8% since 2011 levels.

Age structure

8.7 **Table 8.2** shows the distribution of residents within the Neighbourhood Plan area in line with age. The largest group of residents in the Neighbourhood Plan area are in the 60+ age category (29.5%), higher than comparative figures for the South East (23.4%) and England as a whole (22.3%) and slightly lower in comparison to Lewes District (30.1%).

Table 8.2: Age Band (% of total)[85]

Age Band (% of total)	Peacehaven and Telscombe	Lewes	South East	England
0-15	16.84%	17.40%	19.02%	18.90%
16-24	9.65%	9.36%	11.22%	11.90%
25-44	23.32%	22.05%	26.51%	27.50%
45-59	20.66%	21.07%	19.88%	19.40%
60+	29.53%	30.12%	23.36%	22.30%
Total population	21,544	97,502	8,634,750	53,012,456

Household deprivation

8.8 Household deprivation in the Neighbourhood Plan area (presented in **Table 8.3**) is high. A total of 37.4% of households in Peacehaven and Telscombe are not deprived in any dimension, which is a lower percentage of households when compared to Lewes District (44.4%), the South East (47.7%) and England as a whole (42.5%). For those households which demonstrate deprivation in the Neighbourhood Plan area, most are deprived in one dimension (35.2%), and this is similar compared to the figures for Lewes District (33.7%), the South East (32.2%) and England (32.7%). Notably however, there is a higher percentage of households deprived in two dimensions when compared to Lewes District, the South East, and England.

Table 8.3: Household Deprivation[86]

Household Deprivation (% of total)	Peacehaven and Telscombe	Lewes	South East	England
Household not deprived in any dimension	37.41%	44.36%	47.70%	42.50%
Deprived in 1 dimension	35.21%	33.65%	32.23%	32.70%
Deprived in 2 dimensions	22.37%	17.95%	16.02%	19.10%
Deprived in 3 dimensions	4.62%	3.69%	3.65%	5.10%
Deprived in 4 dimensions	0.39%	0.36%	0.39%	0.50%

Index of Multiple Deprivation

8.9 The Index of Multiple Deprivation 2019 (IMD) is an overall relative measure of deprivation constructed by combining seven domains of deprivation according to their respective weights, as described below. The seven deprivation domains are as follows:

[85] ONS (2011) Table KS102EW
[86] ONS (2011) Table QS119EW

- **Income:** The proportion of the population experiencing deprivation relating to low income, including those individuals that are out-of-work and those that are in work but who have low earnings (satisfying the respective means tests).
- **Employment:** The proportion of the working-age population in an area involuntarily excluded from the labour market, including those individuals who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities.
- **Education, Skills and Training:** The lack of attainment and skills in the local population.
- **Health Deprivation and Disability:** The risk of premature death and the impairment of quality of life through poor physical or mental health. Morbidity, disability and premature mortality are also considered, excluding the aspects of behaviour or environment that may be predictive of future health deprivation.
- **Crime:** The risk of personal and material victimisation at local level.
- **Barriers to Housing and Services:** The physical and financial accessibility of housing and local services, with indicators categorised in two sub-domains.
    - 'Geographical Barriers': relating to the physical proximity of local services
    - 'Wider Barriers': relating to access to housing, such as affordability.
- **Living Environment:** The quality of the local environment, with indicators falling categorised in two sub-domains.
    - 'Indoors Living Environment' measures the quality of housing.
    - 'Outdoors Living Environment' measures air quality and road traffic accidents.
- Two supplementary indices (subsets of the Income deprivation domains), are also included:
    - **Income Deprivation Affecting Children Index**: The proportion of all children aged 0 to 15 living in income deprived families.
    - **Income Deprivation Affecting Older People Index:** The proportion of all those aged 60 or over who experience income deprivation.

8.10 Lower Super Output Areas (LSOAs) [87] are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. They are standardized geographies designed to be as consistent in population as possible, with each LSOA containing approximately 1,000 to 1,500 people. In relation to the IMD 2019, LSOAs are ranked out of the 32,844 in England and Wales, with 1 being the most deprived. Ranks are normalized into deciles, with a value of 1 reflecting the top 10% most deprived LSOAs in England and Wales. Within the Lewes local authority district, five of the 62 LSOAs (8%) are classified as in the most deprived 40% nationally.

8.11 In this respect, the highest overall levels of deprivation are within the north eastern section of the Neighbourhood Plan area, in Peacehaven Parish. In terms of Barriers to Housing and Services Domain, which measures the physical and financial accessibility of housing and local services, six of the 62 LSOAs within Lewes District are within the 10% most deprived range. In this respect, higher concentrations of deprivation are also observed in Peacehaven Parish.

Housing tenure

8.12 **Figure 8.1** shows household tenure in the Neighbourhood Plan area. The majority of residents in the Neighbourhood Plan area own their own homes (75.7%), slightly higher than figures for Lewes District (72.7%) and notably higher than the figures for the South East (67.6%) and England overall (63.3%). Further, a smaller portion of residents socially rent their accommodation in the Neighbourhood Plan area (8.3%) in comparison to Lewes District (10.9%), the South East (13.7%) and England (17.7%).

[87] DCLG (2019): Indices of Deprivation Explorer', [online] available from: http://dclgapps.communities.gov.uk/imd/iod_index.html#

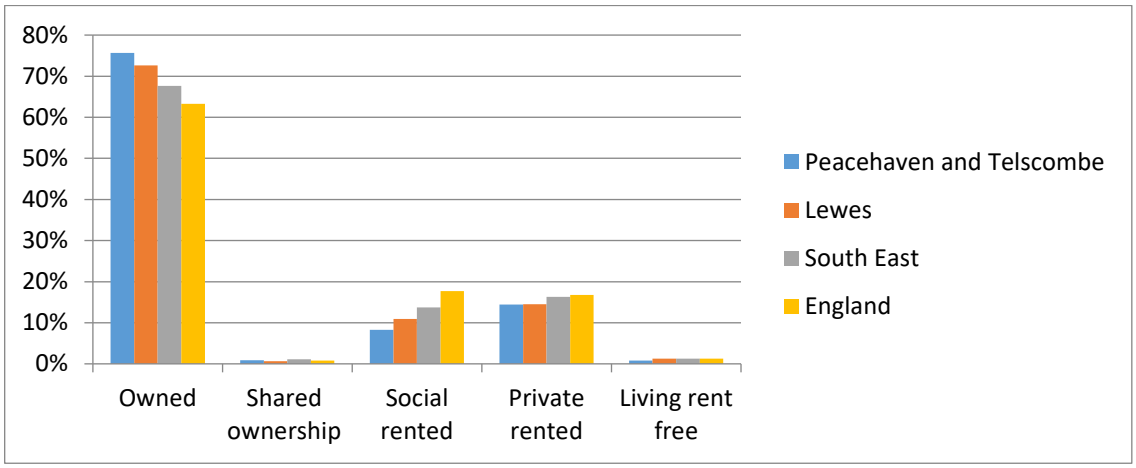

Figure 8.1: Household tenure[88]

Education

8.13 **Figure 8.2** presents the highest level of qualification for residents in the Neighbourhood Plan area. The majority of residents (72.9%) hold qualifications, broadly in line with figures for Lewes (78.6%), and slightly less than the South East (80.9%) and England as a whole (80.6%). Of those with qualifications, 19.3% have at least level 4 qualifications and above, lower than comparative figures for Lewes District (29.4%), the South East (29.9%) and England (27.4%).

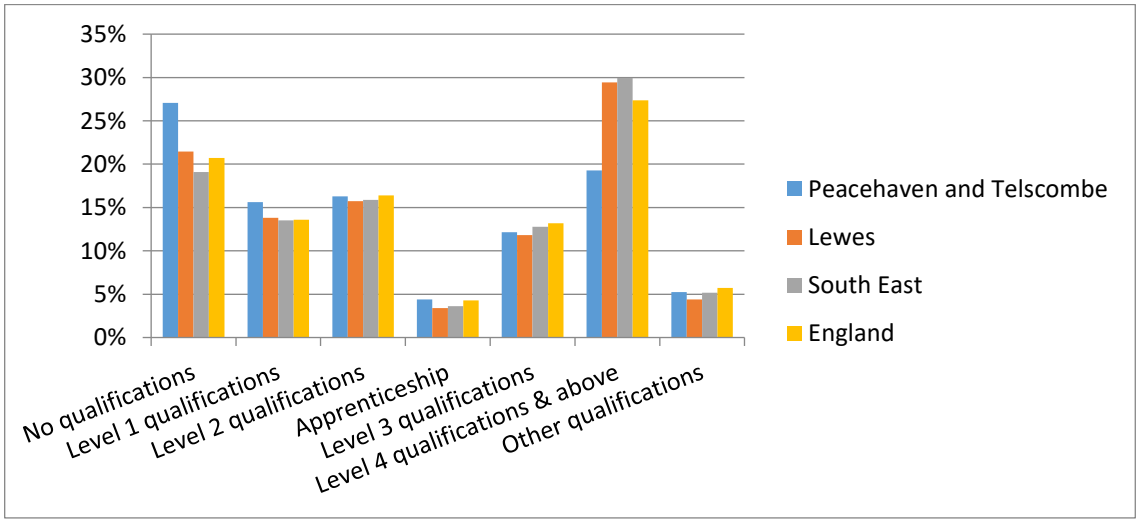

Figure 8.2: Highest level of qualification[89]

Employment

8.14 **Figure 8.3** below shows occupations within the Neighbourhood Plan area as a percentage of those employed. The most representative occupational bands of residents in Peacehaven and Telscombe are:

- Skilled trades occupations (14.9%);
- Professional occupations (12.8%); and
- Caring, leisure and other service occupations (12.7%).

8.15 The percentage of working residents in the Neighbourhood Plan area in professional occupations (12.8%) is lower than comparative figures for Lewes District (18%), the South East (18.7%) and England (17.5%). The opposite trend is observed for skilled trades occupations and managers, caring, leisure and other service occupations as well as sales and customer

[88] ONS (2011) Table QS405EW
[89] ONS (2011) Table QS501EW

service occupations. Given the coastal location of the Neighbourhood Plan area, tourism is a key economic sector.

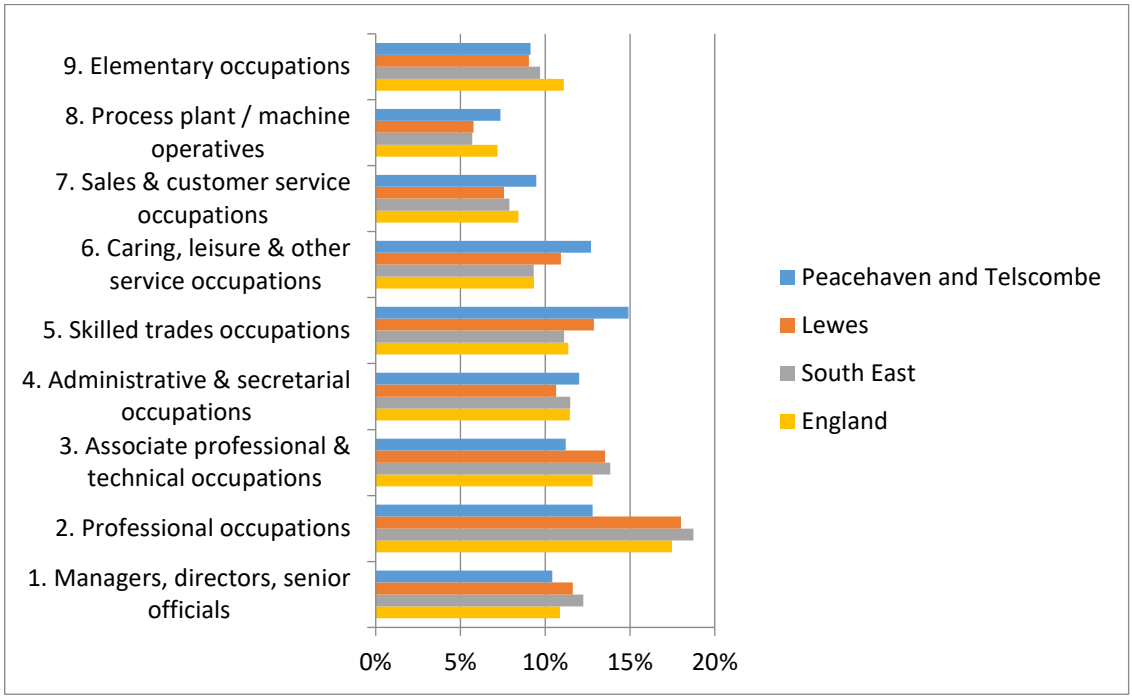

Figure 8.3: Occupations in the Neighbourhood Plan area[90]

8.16 Completed by the Red Group in June 2020 on behalf of the Neighbourhood Plan Steering Group, the 'Peacehaven and Telscombe Economic Area Survey' outlines the existing economic offer within the Neighbourhood Plan area, categorised by the following sectors: agricultural, industrial, leisure, retail, service, and tourism. The distribution of the economic offer within Peacehaven and Telscombe is shown below in **Figure 8.4.**

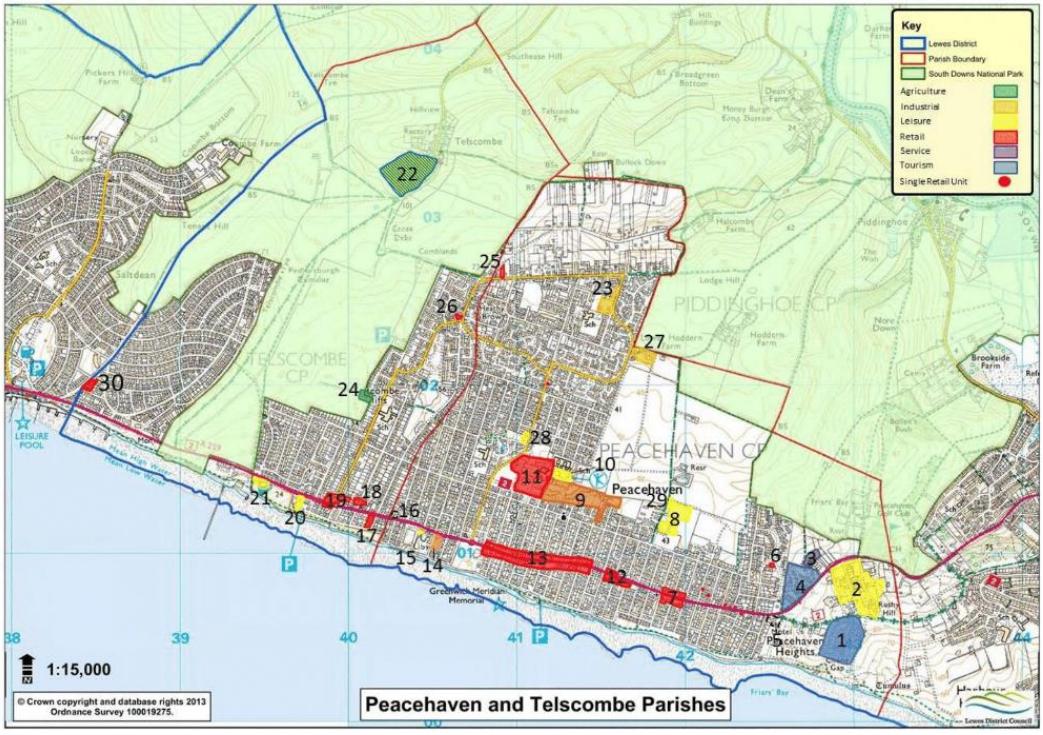

Figure 8.4: Economic offer within the Neighbourhood Plan area

[90] ONS (2011) Tables KS608EW and KS610EW

Community assets and infrastructure

8.17 There are several community assets and facilities within the Neighbourhood Plan area, including:[91]

- The Centenary Park;
- The Community Hub (which includes the Main Hall, the Anzac Room, the Copper Room and the Charles Neville room all available for rent);
- Meridian Centre (which includes the Meridian Surgery, Peacehaven Children's Centre, Peacehaven Community School, Peacehaven Leisure Centre, a parking and shopping centre, green space, and the Meridian Industrial Estate);
- The Peacehaven Community Garden on Glynn Road West;
- A collection of small parks (including Shephard Down, the Dell, Oval, Howards Park, and Epinay Park); and
- The Peacehaven cinema.

8.18 Within Telscombe, there is one main park, Chatsworth Park, which has large open grassed spaces, lovely wooded areas, two children's playgrounds and a memory garden. The memory garden is a small central mound where residents are encouraged to plant anything of their choice, including benches where visitors can sit and reflect. The Robert Kingan playground is a small playground at the northern end of Bannings Vale in East Saltdean. Other amenities and assets within Telscombe include St Laurence Church, various cliff top views of the sea, the Telscombe Village Club and the Telscombe Tye.

8.19 The Telscombe Tye is a registered common, owned by Telscombe Town Council and managed on behalf of the residents[92]. The Stud Farm grazes over 200 sheep on the Tye grassland and a community flock is also present on the land. There are running trails, wildflowers and local residents regularly walk their dogs on the grassy fields of the Tye. Skylarks are also known to nest in the tall grasses[93]. The site is also home to a number of dew ponds, which attract insects, amphibians and feeding birds.

8.20 The East Saltdean and Telscombe Cliffs are located on the south eastern border of the Neighbourhood Plan area (and form part of the Brighton to Newhaven Cliffs SSSI). There is a walk along the top of the cliffs but following a collapse of part of the chalk cliffs, the path was moved inland.[94] Beach walks allow for impressive views of the cliffs and there are a number of clifftop pubs and restaurants serving the area.

8.21 Additional services and facilities include a Post Office in Peacehaven located in 1 Meridian Centre, in the centre of the Parish. There is also a Post Office in Telscombe located on 3 Central Court, Central Avenue. There is one library within the Neighbourhood Plan area, the Peacehaven Library, located in the centre of the Peacehaven Parish, next to the Peacehaven Community School and the Town Council building.

Summary of Future Baseline

8.22 As the population of the Neighbourhood Plan area continues to age, this could potentially negatively impact upon the future vitality of the local community in certain parts of the Neighbourhood Plan area, whilst also placing additional pressures to existing services and facilities.

8.23 The suitability (e.g. size and design) and affordability of housing for local requirements depends on the implementation of appropriate housing policies through the Local Plan and

[91] Peacehaven Town Council – Amenity Hire [online] available from: https://www.peacehaventowncouncil.gov.uk/
[92] Telscombe Town Council (2019) Parks, open spaces and Telscombe Tye [online] available from: http://www.telscombetowncouncil.gov.uk/telscombe-tye/
[93] South Downs National Park - Walking near Telscombe and Mill Hill [online] available from: https://www.southdowns.gov.uk/wp-content/uploads/2015/03/Walks-near-Telscombe-and-Mill-Hill.pdf
[94] Beautiful England - Telscombe Cliffs, Peacehaven, Sussex [online] available from: https://www.beautifulenglandphotos.uk/telscombe-cliffs-peacehaven-sussex/

Neighbourhood Plan. Unplanned development may have wider implications in terms of transport and access to infrastructure, or the natural environment.

Key Sustainability Issues

- Based on mid-2018 population estimates, the total population of the Neighbourhood Plan area has grown to 23,273 residents, a further increase of approximately 8% since 2011 levels.
- The largest group of residents in the Neighbourhood Plan area are in the 60+ age category (29.5%), higher than comparative figures for the South East (23.4%) and England as a whole (22.3%).
- As the population of the Neighbourhood Plan area continues to age, this could potentially negatively impact upon the future vitality of the local community, whilst also placing additional pressures on existing services and facilities.
- For those households which demonstrate deprivation in the Neighbourhood Plan area, most are deprived in one dimension (35.2%), and this is similar compared to the figures for Lewes District (33.7%), the South East (32.2%) and England (32.7%). Notably however, there is a higher percentage of households deprived in two dimensions when compared to Lewes District, the South East, and England.
- Based on the 2019 IMD, the highest overall levels of deprivation are within the north eastern section of the Neighbourhood Plan area, in Peacehaven Parish. Barriers to housing and services is a particular issue.
- The services and facilities within the Neighbourhood Plan area supports community vitality and the quality of life of residents, with the availability of community assets essential for continued growth within the Neighbourhood Plan area.
- As the requirements of the working population continue to change, particularly in response to the COVID-19 pandemic, there is likely to be a requirement for adaptable dwellings which can accommodate more flexible working practices.

What are the SEA objectives and appraisal questions for the Population and Community SEA theme?

SEA objective	Assessment Questions
Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities.	Will the option/proposal help to: • Encourage and promote social cohesion and encourage active involvement of local people in community activities? • Maintain or enhance the quality of life of existing local residents? • Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people? • Encourage and promote employment opportunities to support economic vitality?
Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.	Will the option/proposal help to: • Support the provision of a range of house types and sizes? • Support enhancements to the current housing stock? • Meet the needs of all sectors of the community? • Provide quality and flexible homes that meet people's needs? • Promote the use of sustainable building techniques, including use of sustainable building materials in construction? • Provide housing in sustainable locations that allow easy access to a range of local services and facilities?

9. Health and Wellbeing

Focus of Theme

- Health indicators and deprivation
- Influences on health and wellbeing

Policy Context

9.1 Key messages from the NPPF include:

- One of the three overarching objectives of the NPPF is a social objective to; *'support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing.'*
- *'Planning policies and decisions should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles, especially where this would address identified local health and wellbeing needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.'*
- Policies and decisions should take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.
- Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and wellbeing of communities. Development should avoid building on existing open space, sports and recreational buildings and land, including playing fields.
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.

9.2 In relation to other key national messages in relation to health, Fair Society, Healthy Lives[95] ('The Marmot Review') investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that that there is: "overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities".

9.3 Health Equity in England: The Marmot Review 10 Years On (2020) has been produced by the Institute of Health Equity and commissioned by the Health Foundation to mark 10 years on from the landmark study Fair Society, Healthy Lives (The Marmot Review).[96]

The report highlights that:

- people can expect to spend more of their lives in poor health;
- improvements to life expectancy have stalled, and declined for the poorest 10% of women;
- the health gap has grown between wealthy and deprived areas; and
- place matters – for example living in a deprived area of the North East is worse for your health than living in a similarly deprived area in London, to the extent that life expectancy is nearly five years less.

[95] The Marmot Review (2011): 'The Marmot Review: Implications for Spatial Planning', [online] available to access via: https://www.nice.org.uk/media/default/About/what-we-do/NICE-guidance/NICE-guidelines/Public-health-guidelines/Additional-publications/Spatial-planning/the-marmot-review-implications-for-spatial-planning.pdf

[96] Health Equity in England: The Marmot Review 10 Years on (2020) [online] available to access via https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on

9.4 The increasing role that local level authorities are expected to play in providing health outcomes is demonstrated by recent government legislation. The Health and Social Care Act 2012 transferred responsibility for public health from the NHS to local government, giving local authorities a duty to improve the health of the people who live in their areas. This will require a more holistic approach to health across all local government functions.

9.5 At the local level, the following policies within the Lewes Core Strategy: Local Plan Part 1 directly relate to the Health and Wellbeing theme:

- Core Policy 4: Economic Development & Regeneration;
- Core Policy 6: Retail and Town Centres;
- Core Policy 8: Green Infrastructure;
- Core Policy 9: Air Quality;
- Core Policy 10: Natural Environment and Landscape; and
- Core Policy 13: Sustainable Travel.

9.6 Additionally, the following policies within the Lewes Local Plan Part 2: Site Allocations and Development Management Policies directly relate to the Health and Wellbeing theme:

- Policy DM14: Multi-Functional Green Infrastructure;
- Policy DM15: Provision for Outdoor Playing Space;
- Policy DM16: Children's Play Space in New Housing Development; and
- Policy DM18: Recreation and Rivers.

Baseline Summary

Summary of Current Baseline

Green Infrastructure Networks

9.7 Health is a cross-cutting topic and there are natural synergies with other SEA themes including climate change, population and communities and transport. This is particularly the case in relation to green infrastructure, which is a key aspect of all these themes thanks to its multi-functionality.

9.8 The Lewes District Informal Recreational Space Study[97] recognises that large areas of Peacehaven have been planned as a grid of streets, with few areas of amenity greenspace or semi-natural urban greenspace. However, the Greenhaven's Network, currently representing over 92 community groups, is a collaboration of people who work to protect and improve their local green spaces, stretching from Telscombe to Seaford[98].

9.9 Important open spaces include Telscombe Cliffs, which provide coastal walking trail and beach front walks for the Telscombe Village[99]. The Cliffs are located just south of the Telscombe Tye, a large greenspace with trails and open grasslands for visitors to enjoy. Combined, these two spaces provide the Neighbourhood Plan area with substantial recreational green space. Green spaces within the Neighbourhood Plan area are shown in **Figure 9.1** below and include Epinay Park, Firle Road West Play Area, Mitcheldean, Howards Park, Shepherds Down, The Dell, The Oval, and Sports Park / Big Park (in addition to those listed above).

[97]East Sussex County Council (2005) Lewes District Informal Recreational Space Study [online] available at: https://www.lewes-eastbourne.gov.uk/_resources/assets/inline/full/0/258725.pdf
[98]Peacehaven Town Council – Greenhaven Network [online] available at https://www.peacehaventowncouncil.gov.uk/greenhavens-network/
[99]Mapit: UK - East Saltdean and Telscombe Cliffs [online] available at: https://mapit.mysociety.org/area/4058.html

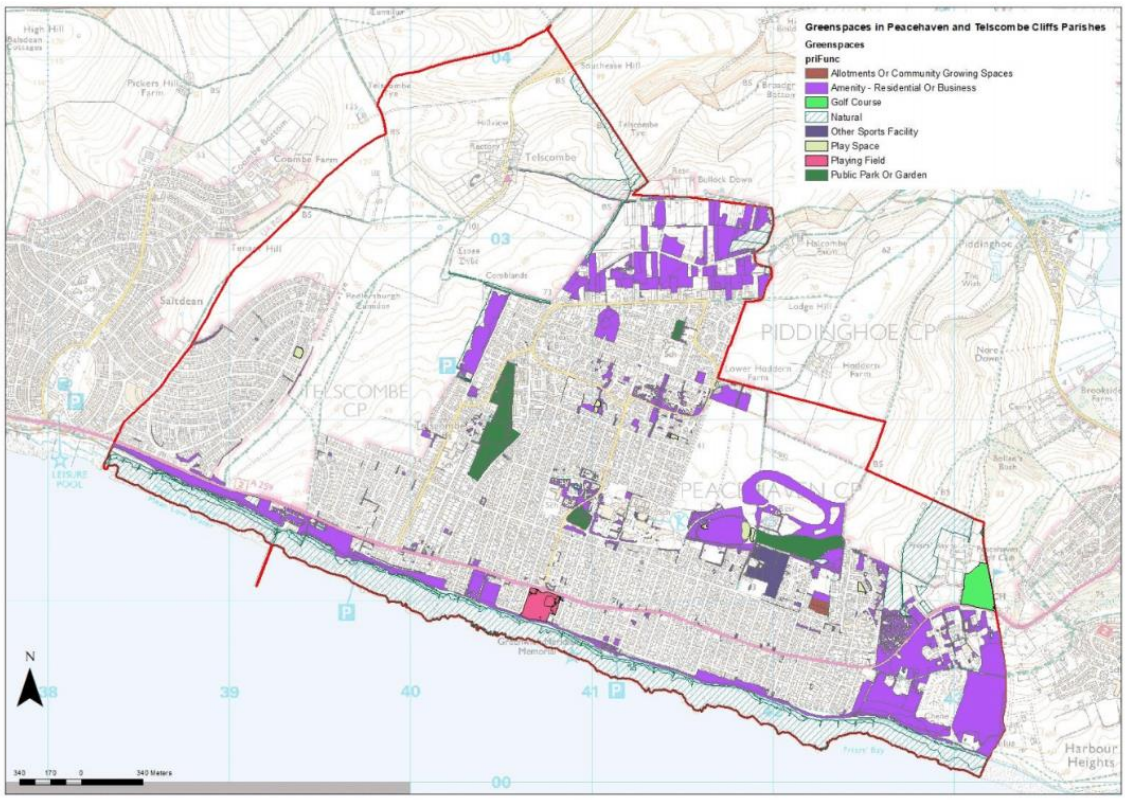

Figure 9.1: Green spaces within the Neighbourhood Plan area

Public Health Profile

9.10 The Lewes District Local Authority Health Profile 2018[100] provides a picture of people's health in the district and is designed to help local government and health services understand their community's needs and work together to improve the local population's health and reduce health inequalities. According to the Lewes Health Profile:

- The health of people in Lewes is generally better than the England average.
- About 13% of children live in low-income families.
- Life expectancy for both men and women is higher than the England average.
- In Year 6, 12.6% of children are classified as obese, better than the average for England.
- The rate of alcohol-specific hospital stays among those under 18 is 54 per 100,000, worse than the average for England.

9.11 The areas where the East Sussex county health profile is performing worse than region trends and England overall include; suicide rates, killed or seriously injured casualties on England's roads, and diabetes diagnosis rate (at the time of delivery)[101].

Indicators of health and wellbeing

9.12 **Figure 9.2** shows general health within the Neighbourhood Plan area. Around 77.4% of residents in the Neighbourhood Plan area demonstrate at least 'good health', lower than figures for Lewes (80.4%), the South East (83.7%) and England (81.4%). The percentage of residents that have 'bad' health or worse in the Neighbourhood Plan area (6.9%), is slightly above that of Lewes District (5.4%) and higher than comparative statistics of the region (4.3%) and the country as a whole (5.4%).

[100] The Lewes District Local Authority Health Profile 2018 [online] available at: http://www.eastsussexjsna.org.uk/JsnaSiteAspx/media/jsna-media/documents/nationalprofiles/profileassests/health/2018/HealthProfile2018Lewes.pdf
[101] Public Health England (2020) Local authority Health Profiles [online] available at: https://fingertips.phe.org.uk/profile/health-profiles/data#page/1/gid/1938132701/pat/6/par/E12000008/ati/202/are/E10000011/iid/20401/age/173/sex/2/cid/4

9.13 Most residents in the Neighbourhood Plan area with long term health conditions do not state that their activities as limited (78.3%), lower than comparative figures for Lewes District (80.5%), the South East (84.3%) and England (82.4%). Approximately 22% of residents in the Neighbourhood Plan area report that their daily activities are limited in some way.

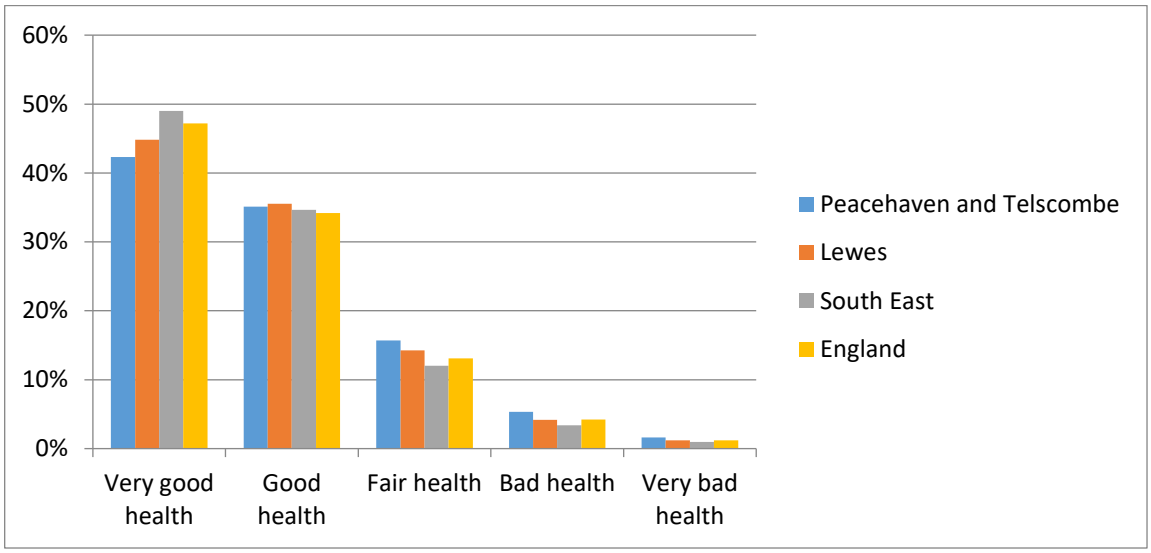

Figure 9.2: General health[102]

Health services

9.14 Within the Neighbourhood Plan area there are a total of eight care homes, including: Haven Care Home, Crowborough Lodge Residential Care Home, The Maples, Roclyns, Fairlight Manor Care Home, Cliff Court, The Seagulls, and The Haven. The care homes provide support for a total of 162 residents. Additionally, the Meridian GP Surgery is accessible within the Meridian Centre, in Peacehaven Parish.

9.15 The closest hospitals to the Neighbourhood Plan area are located in Brighton and Hove, and include: Royal Alexandra Children's Hospital, Royal Sussex County Hospital, Brighton General Hospital and The Montefiore Hospital[103].

Summary of Future Baseline

9.16 Health and wellbeing levels within the Neighbourhood Plan area are generally good, with a high percentage of residents reporting 'good' or 'very good' health, and a low percentage of residents reporting that their activities are limited in some way.

9.17 However, an ageing population within the Neighbourhood Plan area may increase the reported cases of disability, reduce the levels of good health, and place future pressures on health services in the wider area. Similarly, ongoing cuts to community services have the potential to lead to effects on health and wellbeing to key population groups (i.e. elderly population).

9.18 Obesity is also seen as an increasing issue by health professionals, and one that will contribute to significant health impacts on individuals, including increasing the risk of a range of diseases, including heart disease, diabetes and some forms of cancer.

9.19 Poor mental health is associated with low long term life quality, a larger number of hospitalisations and deaths. Experts indicate that problems surrounding the worsening of mental health, including secondary dependencies such as alcoholism are likely to worsen over time without suitable changes within communities.

[102] ONS (2011) Table KS301EW
[103]The Argus - Hospitals in Brighton [online] available at: https://www.theargus.co.uk/li/hospitals.in.Peacehaven,%20East%20Sussex/

Key Sustainability Issues

- Green spaces within the Neighbourhood Plan area include Centenary Park, Chatsworth Park, Telscombe Tye, Telscombe Cliffs, Epinay Park, Firle Road West Play Area, Mitcheldean, Howards Park, Shepherds Down, The Dell, The Oval, and Sports Park / Big Park.
- The Public Health Profile for Lewes District indicates that the rate of killed and seriously injured on roads is worse than the England average.
- The percentage of residents that have 'bad' health or 'very bad health' in the Neighbourhood Plan area (6.9%), is slightly above that of Lewes District (5.4%), South East England (4.3%) and England (5.4%).
- Based on 2011 Census data, approximately 22% of residents in the Neighbourhood Plan area report that their daily activities are limited in some way.
- Access to health care provision within the Neighbourhood Plan area will continue to be important in response to population growth and an increasing ageing population.

What are the SEA objectives and appraisal questions for the Health and Wellbeing SEA theme?

SEA objective	Assessment Questions
Improve the health and wellbeing residents within the Neighbourhood Plan area.	Will the option/proposal help to: • Promote accessibility to a range of leisure, health and community facilities, for all age groups? • Address the key challenges identified in the JSNA? • Support green infrastructure networks? • Provide and enhance the provision of community access to green infrastructure in accordance with Accessible Natural Greenspace Standards? • Protect and enhance access to nature via greenspace, footpaths and cycleways? • Promote the use of active modes of travel? • Encourage healthy lifestyles and reduce health inequalities? • Improve access to the countryside for recreational use? • Avoiding any negative impacts to the quality and extent of existing recreational assets, such as formal or informal footpaths?

10. Transportation

Focus of Theme

- Transportation infrastructure
- Traffic flows and congestion
- Accessibility
- Car ownership
- Travel to work

Policy Context

10.1 European and UK transport policies and plans place emphasis on the modernisation and sustainability of the transport network. Specific objectives include reducing pollution and road congestion through improvements to public transport, walking and cycling networks and reducing the need to travel. National policy also focuses on the need for the transport network to support sustainable economic growth.

10.2 Key messages from the NPPF include:

- *'Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*
- *The potential impacts of development on transport networks can be addressed;*
- *Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised;*
- *Opportunities to promote walking, cycling and public transport use are identified and pursued;*
- *The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account; and*
- *Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.'*
- *'Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.'*

10.3 Each Local Transport Authority in England and Wales has a statutory duty to produce and adopt a Local Transport Plan through the Local Transport Act 2000, as amended by the Local Transport Act 2008. In this regard, the East Sussex Local Transport Plan (2011)[104] sets out the future direction for planning and providing the transport infrastructure and services needed to deliver sustainable economic growth and support additional housing in the county up to 2026.

10.4 At the local level, the following policies within the Lewes Core Strategy: Local Plan Part 1 directly relate to the Transportation theme:

- Core Policy 5: The Visitor Economy;
- Core Policy 8: Green Infrastructure;
- Core Policy 9: Air Quality; and
- Core Policy 13: Sustainable Travel.

[104] East Sussex County Council (2011): 'Local Transport Plan 2011-2026 [online] available at: https://www.eastsussex.gov.uk/media/2336/ltp3_main_doc_2011-2026.pdf

10.5 Additionally, the following policies within the Lewes Local Plan Part 2: Site Allocations and Development Management Policies directly relate to the Transportation theme:

- Policy DM35: Footpath, Cycle and Bridleway Network.

Baseline Summary

Summary of Current Baseline

Rail network

10.6 There is no train station located in the Neighbourhood Plan area. The closest train station is located to the east of the Neighbourhood Plan area, the Newhaven Town Railway station, which is one of two stations serving Newhaven, the other being Newhaven Harbour. The station is operated by Southern and is part of the Seaford Branch connecting the area to Newhaven and Seaford. The other major train station is located in the city of Brighton, the Brighton Railway Station[105]. The Brighton Railway Station is managed by Southern Rail and connects the area to Shoreham-by-Sea, London and the county town of Lewes to the east.

Bus network

10.7 The Brighton and Hove bus company operates both in Peacehaven and Telscombe, connecting the area to Brighton, Eastbourne, Newhaven and Rottingdean[106]. Services include the 12, 12X, 12A, 13X, 14, 14A, 14B, 14C. There are also three school bus services in Peacehaven: 76A, 92 and 494. The school bus 92 also services Telscombe.

Road network and congestion

10.8 The major road that passes within the Neighbourhood Plan area is the A259, or the South Coast Road. The A259 is located on the south coast of England passing through Hampshire, West Sussex, East Sussex and Kent; the main part of the road connects Brighton, Eastbourne, Hastings, Rye and Folkestone. The A259 is a busy two-lane road that is known to be both congested and hazardous, with numerous accidents reported each year[107]. The A259 carries traffic from Maidstone to Tunbridge Wells to Newhaven, which is located just east of the Neighbourhood Plan area. There are also concerns that the A259 cannot accommodate any further increases in demand[108].

10.9 The local road system in Peacehaven and Telscombe is, for the main part, a grid network centring around Roderick Avenue which runs north / south and meet the A259. Some roads in the grid have been blocked, creating dead-ends for road users. The A259 is the most significant pinch point. Journey times can significantly increase during rush-hour in both directions. Other pinch points include the roundabout between Sutton Avenue and Greenwich Way, traffic merging into Roderick Avenue from side streets, and Kirby Drive which becomes Telscombe Road.

10.10 Parking is also a key issue for the community. However, there is free parking for up to two hours in several areas across the town, including at the Meridian Centre.

Public Rights of Way network

10.11 The network of public rights of way in East Sussex is approximately 3,558 km, including public footpaths, public bridleways, restricted byways, and byways open to all traffic[109]. Peacehaven Town Council (along with residents) have set up a working group to try and secure a public right

[105] Brighton Station Information - Southern Railway [online] available to access via: https://www.southernrailway.com/travel-information/plan-your-journey/station-information/stations/brighton
[106] Brighton and Hove – Services and Routes [online] available at: https://www.buses.co.uk/services
[107] Safe Rottingdeam (2020) A259 Traffic Congestion Petition [online] available at: https://www.safe-rottingdean.org.uk/presenting-at-the-planning-committee/
[108] Lewes District Council and South Downs National Park Authority (2016) Lewes District Local Plan - Part 1 Joint Core Strategy 2010-2030 [online] available to access via: https://www.lewes-eastbourne.gov.uk/_resources/assets/inline/full/0/257159.pdf
[109] The Rights of Way Network in East Sussex [online] available at: https://www.eastsussex.gov.uk/media/5520/rowip-chapter-4.pdf

of way[110]. The proposed route is near the Peacehaven Wastewater Treatment Works and evidence is being gathered in support of a claim that the path meets the conditions required to be recognised as a right of way.

10.12 There are two National Trails located within the Neighbourhood Plan area, passing through the South Downs National Park[111]. The first trail is around 6.5 km in length, beginning in Saltdean and ending near to Longridge Avenue, past a dew pond and the St. Lawrence Telscombe Church. The second trail (Mill Hill) is a circular route approximately 8.8 km in distance, beginning on Telscombe road before heading northwards, passing a church and dew ponds.

10.13 There is one National Cycle Network Route that passes through the Neighbourhood Plan area[112]. Route 2 is a long-distance cycle route which links Dover in Kent with St. Austell in Cornwall via the south coast of England. The closest Regional Cycle Network Route (90) is located north of the Neighbourhood Plan area, passing through Lewes city centre.

Access to cars and vans

10.14 **Figure 10.1** shows car and van ownership within the Neighbourhood Plan area. A smaller proportion of residents in the Neighbourhood Plan area have access to a car or van (79.4%) in comparison to the South East (81.4%). However, the Neighbourhood Plan area has a greater portion of residents who own a car or van than compared to England as a whole (74.0%).

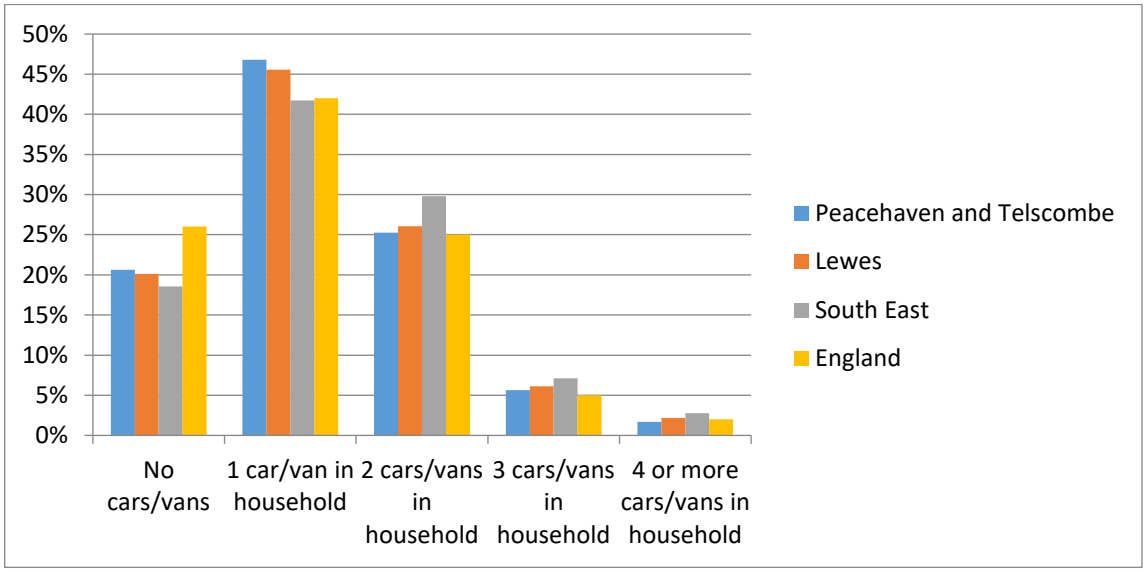

Figure 10.1: Car and Van ownership in the Neighbourhood Plan area[113]

Method of travel to work

10.15 The most common form of travel to work for Peacehaven and Telscombe residents is via car or van (40.1%), higher than averages for Lewes District (37.6%), and England (37.0%) and slightly lower when compared to the South East (41.3%). Further, a comparatively high proportion of residents take the bus, minibus or coach in Peacehaven and Telscombe (10.6%) in comparison to the regional and national trends. This is shown overleaf in **Figure 10.2.**

[110] Peacehaven Town Council (2020) Public Right Of Way [online] available at: https://www.peacehaventowncouncil.gov.uk/public-right-of-way/
[111] South Downs National Park - Walking near Telscombe and Mill Hill [online] available from: https://www.southdowns.gov.uk/wp-content/uploads/2015/03/Walks-near-Telscombe-and-Mill-Hill.pdf
[112] Sustrans - Map of the National Cycle Network [online] available at: https://www.sustrans.org.uk/national-cycle-network/
[113] ONS (2011): Table KS404EW

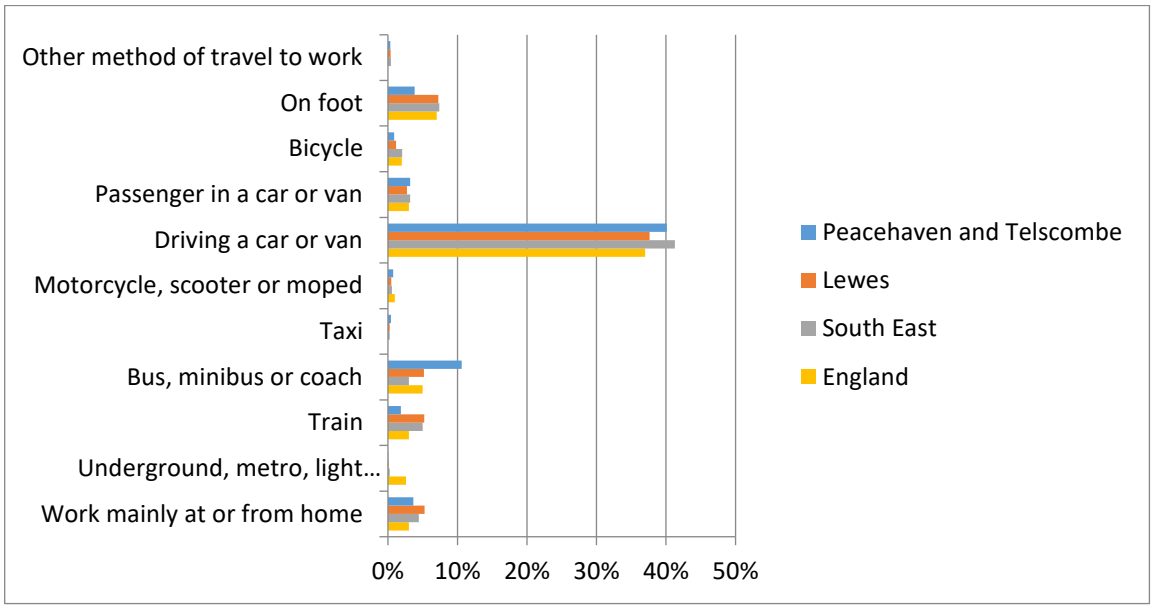

Figure 10.2: Method of travel to work[114]

Summary of Future Baseline

10.16 New development has the potential to increase traffic and cause congestion within the Neighbourhood Plan area, principally at junctions on key routes. This is likely to continue to be more pronounced during peak times (i.e. rush hours). This is significant in the local context, due to the pressures from the local road network along the A259.

10.17 However, development within the Neighbourhood Plan area has the potential to lead to enhancements to the transport network in order to promote more sustainable modes of travel, such as the existing pedestrian and cycle network.

10.18 Additionally, there are opportunities to improve public transport networks within the Neighbourhood Plan area in order to facilitate for more sustainable modes of transport whilst alleviating pressures on main road networks. Similarly, the provision of infrastructure to promote at home (i.e. remote) working is likely to positively contribute towards these aims.

10.19 Whilst negative effects of new development on the transport network are likely to be mitigated in part by new infrastructure, there will be a continuing need for development to be situated in accessible locations.

Key Sustainability Issues

- There are no rail stations located in the Neighbourhood Plan area. The nearest stations are in the neighbouring settlements of Brighton and Hove, and Newhaven.
- There are several bus routes passing through Peacehaven and Telscombe. The frequency of services varies, and it will be important for the Neighbourhood Plan to continue to facilitate and encourage a transition to more sustainable methods of transportation.
- The A259 road, or the South Coast Road, is where most congestion is reported and is a concern for the residents of Neighbourhood Plan area. Development within the Neighbourhood Plan area should consider ways to mitigate congestion along the A259.
- Additional traffic pinch points include the roundabout between Sutton Avenue and Greenwich Way, traffic merging into Roderick Avenue from side streets, and Kirby Drive which becomes Telscombe Road.
- The most common form of travel to work for Peacehaven and Telscombe residents is via car or van (40.1%), higher than averages for Lewes District (37.6%) and England (37.0%).

[114] ONS (2011) Table QS701EW

- The recovery from the COVID-19 pandemic has the potential to change travel patterns in the village in the short, medium and (potentially) longer term.

What are the SEA objectives and appraisal questions for the Transportation SEA theme?

SEA objective	Assessment Questions
Promote sustainable transport use and reduce the need to travel.	Will the option/proposal help to: • Encourage modal shift to more sustainable forms of travel? • Facilitate working from home and remote working? • Improve road safety? • Reduce the impact on residents and the built environment from the road network?

11. Next Steps

Subsequent stages for the SEA process

11.1 The five stages of the SEA process[115] are identified below. Scoping (the current stage) is the second stage of the SEA process.

i. Screening;

ii. Scoping;

iii. Assess reasonable alternatives, with a view to informing preparation of the draft plan;

iv. Assess the draft plan and prepare the Environmental Report with a view to informing consultation and plan finalisation;

v. Publish a 'statement' at the time of plan adoption in order to 'tell the story' of plan-making / SEA (and present 'measures concerning monitoring').

11.2 The next stage will involve appraising reasonable alternatives for the Peacehaven and Telscombe Neighbourhood Plan. This will consider alternative policy approaches for the plan, including, if appropriate, alternative spatial strategies. The findings of the appraisal of these alternatives will be fed back to the Neighbourhood Plan Steering Group so that they might be taken into account when preparing the draft plan.

11.3 Once the draft 'pre-submission' plan has been prepared by the Neighbourhood Plan Steering Group, it will be subjected to SEA and the Environmental Report prepared for Regulation 14 consultation alongside it.

11.4 Following subsequent submission to Lewes District Council, and consultation, the Neighbourhood Plan will be put forward for Independent Examination.

Consultation on the Scoping Report

11.5 At this scoping stage, the SEA Regulations require consultation with statutory consultation bodies. The statutory consultation bodies are the Environment Agency, Historic England and Natural England. The Scoping Report has been released to these three statutory consultees, as well as the South Downs National Park Authority.

11.6 Consultees are invited to comment on the content of this Scoping Report; in particular, the evidence base for the SEA, the identified key issues and the proposed SEA Framework.

11.7 The consultation period runs from TBC to TBC. Comments on the Scoping Report should be sent to:

Ryan Putt, Environmental Consultant, AECOM

Email address: ryan.putt@aecom.com

11.8 All comments received on the Scoping Report will be reviewed and will influence the development of the SEA where appropriate.

[115] In accordance with the stages set out in the National Planning Practice Guidance

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