

Newhaven Neighbourhood Plan



Sustainability Appraisal Scoping Report including Strategic Environmental Assessment

Published by Newhaven Town Council under the Neighbourhood
Planning (General) Regulations 2012 and in accordance with EU
Directive 2001/42

September 2015



1. Introduction

1.1 Newhaven Town Council is developing a Neighbourhood Development Plan in order to guide development in the town until 2030. As sustainability is an important consideration in land use planning, a Sustainability Appraisal will be undertaken on the contents of the plan.

1.2 This report is the Scoping Report, the first stage in developing the Sustainability Appraisal. As required by both European and national law, consideration in this report is given to the requirements of the Strategic Environmental Assessment Directive.

1.3 This report is structured in the following manner:

- **Section 2 provides a background to the Sustainability Appraisal and Neighbourhood Development Plan;**
- **Section 3 provides a portrait of the town;**
- **Section 4 identifies the main sustainability issues in the town;**
- **Section 5 provides a sustainability framework that will be used to appraise the policies**
- **Section 6 indicates the next steps to be carried out in the production of the Sustainability Appraisal**

1.4 This report has been made available for consultation for a 6 week period between 18th September 2015 and 30th October 2015. Comments can be sent to us via:

- Post: Head of Strategic Development, Newhaven Town Council, 18 Fort Road, Newhaven, East Sussex, BN9 9QE
- Email: susie.mullins@newhaventowncouncil.gov.uk

1.5 This report poses a number of questions at the end of each section that may aid those making a response to the document. The questions are identified in a text box. Although there are specific questions asked, respondents are welcome to submit comments on any aspect of this report.

2. Background

2.1 Under the Localism Act (2011) and related Neighbourhood Planning Regulations (2012), local communities can have a larger say on the development of their area by undertaking neighbourhood planning.

2.2 Lewes District Council and South Downs National Park Authority have designated an area within Newhaven as a neighbourhood area in order to allow us, Newhaven Town Council, the opportunity to produce a Neighbourhood Development Plan. The area comprises of the administrative boundary of the parish **but does not** include land owned by Newhaven Port and Properties and used as port land.

2.3 The Neighbourhood Development Plan will conform to the Lewes District Joint Core Strategy, due for adoption in late 2015/early 2016. This will set out the strategic planning policy for the district until 2030. It is intended that our Neighbourhood Development Plan will supplement the Core Strategy, covering a number of different aspects relating to land use in the town including residential development.

Sustainable Development

2.4 As the National Planning Policy Framework states, the aim of the planning system is to deliver sustainable development. This has been carried through in the Neighbourhood Planning Regulations, which requires that neighbourhood development plans contribute to the achievement of sustainable development. Thus, in order to meet this basic condition, we intend to undertake a sustainability appraisal of the Neighbourhood Development Plan.

2.5 For their Joint Core Strategy, Lewes District Council and the South Downs National Park Authority carried out a full sustainability appraisal on the contents of their plan. The sustainability appraisal incorporated the requirements of the Strategic Environmental Assessment Directive.

2.6 In Appendix 1 at the end of this report, we have considered the need of whether our sustainability appraisal should incorporate the requirements of the Strategic Environmental Assessment Directive. In light of this consideration it has been concluded that it is not possible to rule out likely significant environmental effects and so a Strategic Environmental Assessment will be prepared for the Neighbourhood Development Plan also.

Questions to Section 2 – Background to Sustainability Appraisal

1. Do you agree with the findings of the analysis presented in Appendix 1?
2. Do you believe that a simple sustainability appraisal is appropriate for this Neighbourhood Development Plan?

3. Town Portrait

For this section, much of the data has been taken from 'A Profile of Newhaven' produced to provide a wide range of background information on the town to assist in the production of the Newhaven Neighbourhood Plan.

Specifically the 'Profile':

- Provides evidence and a starting point in understanding what makes Newhaven 'tick' and what issues impact on the different communities within the town area.
- Helps establish the scope of this Sustainability Appraisal and SEA by which the draft and final versions of the Newhaven Neighbourhood Plan will be assessed and refined and, in doing so, provide the Town Council with a means of consulting with the statutory authorities on its proposed scope.

Data for the 'Profile' was sourced from www.eastsussexinfigures.org.uk using statistics primarily drawn from the 2011 Census. Other web sites used include, www.natureonthemap.naturalengland.org.uk/MagicMap.aspx as well as using local knowledge.

General

Newhaven is located at the southern end of the Lewes District area and has a strong sense of identity, which is visually enhanced by the background of the South Downs and the adjacent River Ouse and the coast.

Today the people of Newhaven remain proud of the maritime Heritage of their town and the continuing status of the town as a port with its daily ferry to Dieppe. The town remains an important gateway to Europe and is in a key strategic location, placed within short distances of Eastbourne, the City of Brighton and the County town of Lewes.

It is a medium sized town with a population of just under 13,000 and has a range of characteristics that in parts are urban, rural and coastal. The town's industrial image and history are set against a backdrop of an outstanding landscape of rolling hills. The town has a strong history in fishing, manufacturing and port activities.

In recent years the town has experienced some regeneration, but like other areas has been the victim of the economic downturn, with investment reducing and previous industries falling out of favour. Consequently many local people seek work out of Newhaven. It is recognised that Newhaven continues to need

considerable investment, and regeneration of the town remains a priority at regional and local government level.

These issues along with the reduction in public spending and private investment have put a strain on the town and in certain areas, such as the town centre, this is particularly evident.

Despite these challenges, the strong sense of place and community in the town remains and this is for good reason. As well as the appreciation of the unique setting of the town, there are many potential opportunities for the town to thrive and prosper.

Social Characteristics

The following list sets out the key characteristics relating to the Social Profile of the Town:

Key Characteristics

- By virtue of its employment base and location on important public transport routes, Newhaven is seen by the District Council as the most sustainable location for housing development and therefore the town will see a significant rise in population.
- Need to balance housing needs identified in Lewes District Core Strategy with protection of urban, rural and coastal environments.
- Current housing stock shows relatively low number of flats whilst relatively high number of single households. Newhaven has a relatively high proportion of young people under the age of 29. These are people that will be looking for smaller type of accommodation in the future.
- Current higher evidence of single person households need through LDC Housing needs survey.
- 189 persons on District Councils Housing Need register as at May 2014
- Relatively low choice of detached homes in the existing housing stock and therefore smaller choice of homes to aspire to.
- Pockets of poorer health which may generate the need for homes suitable for adaptation
- Lower percentage of people work from home
- Higher incidence of people walking and cycling to work suggests local employment opportunities
- Predicted shortfall in early years, primary school and secondary school provision
- Higher % with no qualification compared with Lewes and East Sussex.
- Fewer qualified to Level 4 and above compared to Lewes and East Sussex
- Higher % of 0 – 14 year olds than Lewes District and East Sussex
- Higher % of households in poverty below 60% of GB median compared to Lewes and East Sussex average
- Lower average income than Lewes District and ESCC
- Relatively poorer educational achievement
- Undersupply of formal recreation provision and play space
- Waiting list for allotments

- Older parts of the town have little public amenity space
- Natural and man-made elements sever parts of the town from one another
- A259 which is a heavily congested urban road and to the trunk road network by the A26.
- Lower car ownership than Lewes, ESCC and South East

Economic

The following list sets out the key characteristics relating to the economic profile of the town:

Key Characteristics.

- The gradual decline of the town's manufacturing and industrial base has compounded Newhaven's decline although a high proportion of jobs are still in manufacturing
- Less self-employed than the town of Lewes and East Sussex
- Relatively higher unemployment with 13% claiming out of work benefits
- Less retired
- Higher rate of long term unemployment (both male and female) including the 16-24 years age range
- Higher long term sickness
- Significant number of contaminated sites which could impact on viability of sites for development
- Economic activity growing with Enterprise centre and its proposed extension to provide 'move on' space
- Impact of ring road on town centre
- Decline of town centre with few multiples and a number of empty shop units.
- Contraction of all types of retail
- Recent loss of last bank in Old Town centre has made impact
- Shift of retail offer from west to east of the river.
- Town centre would benefit from for visual enhancement of public realm
- Lewes District Council has identified Newhaven as area to encourage green technology sector potentially creating new education, training and employment opportunities, with 'clean green and marine' focus.
- Future market prospects for increased visitor accommodation
- Port activity will influence local job market

Environmental

The following list sets out the key characteristics relating to the environmental profile of the town:

Key Characteristics

- Improvement needed to public realm within town centre for community and visitors
- Strengthen connectivity of retail areas east and west of the river
- Improvement to quality and signage of routeways within the town to join up different neighbourhoods
- Severance impact of ring road on town centre
- Severance impact of river between east and west sides of the town
- Poor environmental quality to town centre gateways
- Industrial 'clutter' on North Quay (outside Neighbourhood Plan scope as not within NP designated area)
- Visual impact of older industrial/employment areas
- Stark contrast between urban and rural landscapes
- Importance of urban and rural landscapes on tourism when approaching town from the sea
- Flood risk identified to areas within the town
- Unprotected cliffs
- Part of Neighbourhood Plan area within South Downs National Park
- Impacts of Climate Change
- Poor air quality in congested parts of the town
- Brighton and Lewes Downs Biosphere within Parish
- SSSI and Local Nature Reserves within parish boundary
- Proximity of Scheduled Ancient Monument
- Current impact of flooding to be improved as Environment Agency start work 2016 on flood defences

Questions to Section 3 – Town Portrait

3. Have we correctly identified the characteristics of the town?
4. Is there information that should have been included in this section?

4. Sustainability Issues

From the 'characteristics section there are many issues that have been identified that are relevant for Newhaven. Of particular note are:

- Need for homes to meet local need and wider needs of the District and for infrastructure to keep pace with housing provision
- Support improved academic performance
- Improve health and wellbeing
- Historical shortfall in open space both formal and informal
- Need to enhance historic town centre qualitatively and build on historic assets and heritage
- Diversify employment opportunities for town following loss of manufacturing jobs,
- Loss of retail and services in the town centre (old town)
- Air Quality Management Area in Town Centre through vehicle use of A259
- Lack of green spaces in built up area and poor public realm
- Historic flooding and location of parts of town on exposed steep banks/hills

Questions to Section 4 – Sustainability Issues

5. Do you believe that we have identified the main sustainability issues?

6. What other issues should we have identified?

5. Sustainability Framework

The sustainability framework is the mechanism for showing that the plan contributes to the achievement of sustainability development, one of the conditions that a Neighbourhood Plan is required to meet at examination.

Below are listed a set of objectives that are relevant for Newhaven and questions which will appraise the policies and sites that we will develop, in response to the public consultation that Newhaven Town Council has carried out. By asking if the policies that are developed support the list of objectives, will give clarity as to whether the Neighbourhood Plan is in pursuit of sustainable development.

The following list sets out the objectives against which the emerging planning policies will be judged:

Objective	Will development bring about the following:
Social	
<p><i>1. To deliver the planned housing growth in the Neighbourhood Plan, so that people who live and would like to live in Newhaven have the opportunity to secure a decent home to meet their current and changing needs.</i></p>	<ul style="list-style-type: none"> • reduce number of households considered homeless • reduce households on the housing needs register • additions to the housing stock • provision of affordable housing
<p><i>2. To ensure that residents have easy access to the services and facilities.</i></p>	<ul style="list-style-type: none"> • improved residents' health • recognise the needs of the elderly and disabled population • development close to services and facilities?
<p><i>3. To support individual and employment needs of education, skills and lifelong learning.</i></p>	<ul style="list-style-type: none"> • improvement of skills levels • improved access to educational services
<p><i>4. To maintain and improve local cultural, social and leisure provision.</i></p>	<ul style="list-style-type: none"> • provision of recreation space/footpaths • improvement to environment • reflect local needs to improve wellbeing • improve local amenities
<p><i>5. To reduce crime and fear of crime</i></p>	<ul style="list-style-type: none"> • provision of visible areas for recreation • enhance community facilities • provide increased satisfaction of people of their local area
<p><i>6. To maintain and enhance built and historic assets of the town including the historic urban character areas of the High Street and Old Bridge Street (Old Town).</i></p>	<ul style="list-style-type: none"> • positive impact on historic street frontage • positive contribution to visual strengths and amelioration of weaknesses • positive impacts on listed buildings • positive impacts on historic shopfronts

<i>7. To promote the town centre as an area for the community and visitors to socialise, shop, and spend leisure time enhancing the vitality and vibrancy of this central location</i>	<ul style="list-style-type: none"> • reduce retail vacancy rates in town centre • increase footfall in the town centre
Economic	Will development bring about the following:
<i>8. To maintain and increase a prosperous local economy through the provision of employment for the local population, whilst recognising Newhaven's role to provide employment for the wider area.</i>	<ul style="list-style-type: none"> • increase of employment land • creation of jobs • reduction of retail vacancy rates
<i>9. To retain and encourage visitors to Newhaven by maintaining and increasing the contribution of tourism.</i>	<ul style="list-style-type: none"> • provide jobs in the tourism sector • Increase visitor numbers • recognise value of tourism
<i>10. To reduce the proportion of Newhaven's households that experience deprivation.</i>	<ul style="list-style-type: none"> • provision of employment, improved education facilities, healthy living opportunities, improved living conditions and reduced crime.
Environmental	Will development bring about the following:
<i>11. To reduce noise and support a high quality environment in terms of air, soil and water quality.</i>	<ul style="list-style-type: none"> • reduction in water consumption • impact on water quality • reduction in noise pollution • reduction of road congestion • reduction of air pollution and improvements to AQMA • impact on soil pollution • sustainable location of

	development
<i>12. To support efficiency in land use through the re-use of previously developed land.</i>	<ul style="list-style-type: none"> • best use of brownfield land • protection to quality agricultural land • intensification of residential use to appropriate density
<i>13. To enhance the urban character of Newhaven and strengthen the 'sense of place'</i>	<ul style="list-style-type: none"> • opportunity to contribute to street scene • opportunity to provide civic and public realm improvements
<i>14. To enhance the biodiversity of the town.</i>	<ul style="list-style-type: none"> • provide fauna and flora corridors • protection to internationally and nationally important wildlife and geological sites
<i>15. To reduce the level in growth of car usage and avoid intensification of the A259 ring road, whilst improving road safety.</i>	<ul style="list-style-type: none"> • removal of Air Quality Management Area (AQMA) • avoid the use of a car
<i>16. To reduce the risk of tidal and fluvial flooding and reduce surface water run-off.</i>	<ul style="list-style-type: none"> • low/nil impact on flooding • reduce the risk of flooding • sustainable building techniques
<i>17. To improve energy efficiency to minimise Newhaven's contribution to climate change.</i>	<ul style="list-style-type: none"> • reduce carbon dioxide emissions • reduce energy consumption • use energy from natural sources
<i>18. To reduce the production of waste and use waste as a resource.</i>	<ul style="list-style-type: none"> • reduction in the generation of waste • increase in recycling rates

Questions to Section 5 – Sustainability Framework

7. Do you believe that the framework set out above is an appropriate way to appraise policies of the Newhaven Neighbourhood Plan?

8. Are there any objectives or questions that should be added to the framework?

9. Are there any objectives that you consider will not be effective in determining the sustainability of emerging policies?

6. Next Steps

6.1 Comments received on this Scoping Report will be taken into account and as a result, revisions may be made to different parts of the document.

6.2 Once finalised, the sustainability framework (section 5) will appraise development and policy options for the Newhaven Neighbourhood Plan, identifying options that would deliver the most sustainable outcomes.

6.3 The final sustainability appraisal (incorporating SEA) report will accompany the proposed Neighbourhood Development Plan that will be submitted to Lewes District Council as part of the Regulation 14 consultation under the Neighbourhood Planning Regulations (2012).

6.4 The sustainability appraisal report will be the document that demonstrates, as required by the Neighbourhood Planning Regulations, that the making of the Newhaven Neighbourhood Plan contributes to the achievement of sustainable development.

Appendix 1

Introduction

1. Neighbourhood Development Plans are a relatively new tier of planning policy produced by local communities. When adopted, such plans will be used by local planning authorities to determine planning applications for the Neighbourhood Areas that they cover.

2. Newhaven Town Council had the majority of the Parish designated as a Neighbourhood Area which allows it to produce a Neighbourhood Development Plan.

3. The SEA regulations¹ transpose the EU's SEA Directive² into law. It requires those making plans that could impact on the environment to consider whether they are likely to have a significant effect or not.

Screening Opinion

4. As part of the process of making the Neighbourhood Development Plan, the Parish Council have requested a screening opinion to see whether a Strategic Environmental Assessment is required as part of the plan-making process. Such a requirement can be screened out if it is felt, based on the information available, that the Neighbourhood Development Plan would not have a likely significant environmental affect.

5. In order to assess the likely significance of the plan on the environment, the purpose of the plan has been appraised against the criteria detailed in the regulations and Directive. This analysis has been made in Table 1.

6. The District Council has based its screening opinion on the understanding that the Town Council will prepare a Neighbourhood Plan that:

- will have policies consistent with national policy
- will have policies consistent with existing and emerging local policies
- will allocate around 830 homes in Newhaven
- will base policies on the evidence it has gained from documents such as the Scoping Report

7. If it is presented with additional information that changes its understanding as to what the Newhaven Neighbourhood Plan will cover, the District Council reserves the right to undertake another Screening Assessment which may have different conclusions.

Criteria	Notes	Likely Significant Effect?
1. The characteristics of plans and programmes, having regard, in particular, to—		
(a)the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;	Neighbourhood Development Plans are the lowest-level statutory planning documents in the UK. As such, it does not set a framework for other projects or plans but will be used for guiding development in the town until 2030.	No

¹ Known fully as The Environmental Assessment of Plans and Programmes Regulations 2004

² Known fully as Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment

Criteria	Notes	Likely Significant Effect?
(b)the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;	Neighbourhood Development Plans are influenced by other plans, such as the Lewes District Core Strategy and National Planning Policy. The plan is at the bottom of the hierarchy and is not intended to influence other plans and programmes.	No
(c)the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;	The Neighbourhood Development Plan, as directed by the National Planning Policy Framework, will help promote sustainable development and will consider the environment.	No
(d)environmental problems relevant to the plan or programme; and	The Scoping Report makes it clear that the neighbourhood plan will have a strong emphasis on protecting and conserving the character and quality of the environment. The Scoping Report also identifies sustainability issues relevant to the neighbourhood area. The neighbourhood plan will introduce policies to help overcome such issues and thus reducing environmental problems. Therefore, no significant negative environmental impacts are envisaged through the provisions of the neighbourhood plan.	No
(e) the relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).	N/A for the Neighbourhood Development Plan	No
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to—		
(a) the probability, duration, frequency and reversibility of the effects;	The Neighbourhood Development Plan will guide development in the town until 2030, with the aim of having a positive impact on the town and by promoting sustainable development.	No
(b) the cumulative nature of the effects;	The sustainability appraisal of the Core Strategy considered the impact of development in the Town alongside development in other settlements and towns, including in neighbouring districts. Development in the neighbourhood plan is likely to be consistent to the amount proposed in the Core Strategy. The Habitats Regulations Assessment also considered the effect of development in neighbouring districts on protected sites.	No
(c)the transboundary nature of the effects;		No

Criteria	Notes	Likely Significant Effect?
(d)the risks to human health or the environment (for example, due to accidents);	It is not thought the anything in the Neighbourhood Development Plan will increase risks to human health.	No
(e)the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);	The Neighbourhood Development Plan, unlike most plans, is written for a small area and modest population. The Newhaven Neighbourhood Plan will be allocating sites for development. Although the development planned for will be in line with the targets set in the Core Strategy, it is likely to be of a scale whereby it is difficult to rule out any likely significant effects.	Yes
(f)the value and vulnerability of the area likely to be affected due to— (i)special natural characteristics or cultural heritage; (ii)exceeded environmental quality standards or limit values; or (iii)intensive land-use; and	<p>In collecting information for the Neighbourhood Development Plan, information has been gained on the characteristics of the area – including information on land use, listed buildings, TPOs and SSSIs. This information gathering will inform the contents of the Neighbourhood Development Plan.</p> <p>Although the development target for the town has been appraised through the Lewes District Core Strategy SA/SEA, the precise location of sites was not known. The neighbourhood plan will allocate the sites and so likely significant environmental effects cannot be ruled out.</p>	Yes

Criteria	Notes	Likely Significant Effect?
(g)the effects on areas or landscapes which have a recognised national, Community or international protection status.	<p>The neighbourhood area does include nationally designated landscape including small sections of the South Downs National Park.</p> <p>The Habitats Regulations Assessment for the Core Strategy considered the impact of development in the district, including development in Newhaven, on protected European sites and concluded that there was no significant effect on the protected sites' qualifying features subject to mitigation measures being introduced to protect the Ashdown Forest SAC/SPA. Newhaven is not within the 7km protection zone surrounding the Ashdown Forest SAC/SPA and so is not of concern.</p> <p>The two protected sites within proximity of the neighbourhood area were considered through a Habitat Regulations Screening for the Neighbourhood Development Plan, which arrived at the same conclusions as the Core Strategy's Habitat Regulations Assessment.</p>	No

8. The above analysis was undertaken by Lewes District Council on behalf of Newhaven Town Council for the Neighbourhood Development Plan and it was considered that likely significant environmental effects could not be ruled out and hence a Strategic Environmental Assessment is required to comply with National and European Regulations.

This decision has been based on the assumptions set out in paragraph (6) and for the following Statement of Reasons:

- The Newhaven Neighbourhood Plan is likely to plan for a significant scale of development, including the allocation of development sites.
- As a precautionary measure to ensure that the requirements of the SEA Directive are met which is a key component of meeting the basic conditions³ against which a neighbourhood plan is examined;
- To ensure the Plan has regard to National Planning Practice Guidance⁴;
- To ensure that sustainability is at the heart of the Newhaven Neighbourhood Plan, that all reasonable alternatives are assessed, and

³ <http://planningguidance.planningportal.gov.uk/blog/guidance/neighbourhood-planning/the-basic-conditions-that-a-draft-neighbourhood-plan-or-order-must-meet-if-it-is-to-proceed-to-referendum/>

⁴ <http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/sustainability-appraisal-requirements-for-neighbourhood-plans/>

that the most sustainable options are delivered in light of the sensitive landscape setting and heritage assets of the parish;

- A Sustainability Appraisal/Strategic Environmental Assessment of the Lewes District Local Plan Part 2 has not yet been prepared.