

**Rother District Council**

**Development and Site Allocations Local Plan  
Proposed Submission**

**SUSTAINABILITY APPRAISAL**

**Main Document**

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## **SUSTAINABILITY APPRAISAL (SA) AND STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA) - NON-TECHNICAL SUMMARY**

1. The purpose of Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) is to help planning authorities contribute to achieving sustainable development in preparing their plans. 'Sustainable development' aims to integrate the need to stimulate economic growth, to deliver the needs of all sectors of society and to conserve and enhance the local environment.
2. SEA involves examining certain plans and programmes primarily for significant environmental effects. SA widens the approach to include social and economic as well as environmental issues. Local Planning Authority (LPA) plans must undergo both the process of SA and SEA.
3. The combined process reviews plans against a set of sustainability objectives reflecting local environmental, social and economic issues.

### **The Local Plan for Rother District**

4. Rother District Council's Local Plan is being prepared in two parts:
  1. The Local Plan Core Strategy ("the Core Strategy")
  2. The Development and Site Allocations Local Plan ("the DaSA")

The Core Strategy is the first, principal part of the Council's Local Plan to 2028. It was adopted in 2014. It sets out the Council's strategic policies, including the overall spatial strategy, as well as higher-level "core" policies for a number of strategic matters, relating to sustainable resource management, communities, local housing needs, economy, environment, transport and accessibility and implementation and monitoring. The spatial strategy sets out not only the overall quantum of housing and business growth, but also the distribution of housing growth between individual towns and villages. The Core Strategy was subject to its own Sustainability Appraisal process.
5. The DaSA, as the second part of the Local Plan, carries forward the spatial strategies, strategic objectives and core policies set out in the ['Core Strategy'](#). It will achieve this by reviewing existing site allocations and development boundaries, and by allocating specific areas of land for particular uses in line with the development provisions of the Core Strategy. It will also set out more detailed policies where these are needed to provide guidance for the effective management of development in relation to key issues, such as housing needs, including affordable housing thresholds, employment and tourism sites, development in the countryside, housing standards, landscape, biodiversity and other local environmental matters.
6. It follows that the SA of the DaSA will not need to re-appraise the strategic decisions made in the Core Strategy, but will need to undertake sustainability assessments of reasonable alternatives in relation to both the thrust of options for generic, topic policies that flow from the overall vision, objectives and strategic policies, as well as of specific sites that may be put forward to meet the development strategy for particular areas/settlements.

## Introduction to the Sustainability Appraisal (SA) of the DaSA

7. The Sustainability Appraisal (SA) Report of the DaSA represents the combined output of the SA and SEA processes and hereafter is called “the DaSA SA”. This ‘Non-Technical Summary’ provides an overview of the SA.
8. This SA relates to the ‘Proposed Submission’ version of the DaSA. It has been prepared in tandem with the production of the Local Plan itself.
9. This SA has been preceded by two earlier SA reports:
  - A. DaSA SA Scoping Report.

The Scoping Report established the SA Framework for assessment, including decision-aiding questions and indicators. It also documented the results of the gathering of evidence concerning the current social, economic and environmental conditions in the District. The DaSA SA Scoping Report identified key sustainability problems or likely future problems by looking at statistical trends and comparing the performance of the District with East Sussex as a whole, the South East and England. It was prepared in consultation with the strategic environmental bodies – Natural England, the Environment Agency and Historic England.
  - B. SA of the DaSA Options and Preferred options.

This report appraises the optional broad policy directions in relation to each of the topics identified for policy coverage in the DaSA, as well as the emerging draft policies where these were identified. It also appraised all the reasonable alternatives for sites that had been identified, either through the Strategic Housing Land Availability Assessment (SHLAA) process, as submissions from landowners or developers, or through site surveys by planning officers. It effectively provides a draft version of this report which has both updated earlier assessments where there have been material changes in circumstances and undertakes assessments of policies in their latest form.
10. This version of the DaSA SA is published to support the DASA 'Proposed Submission' version of the document and the related Policies Map<sup>1</sup>.
11. As stated earlier, as well as drawing upon the DaSA SA Scoping Report and the SA of the ‘Options and preferred Options’ version of the DaSA, this report draws upon the SA of Part 1 of the Local Plan – the ‘Core Strategy’. The DaSA SA needs to be read in this context.

## Outcomes of the Sustainability Appraisal (SA) process

12. The outcome of the preliminary ‘Scoping’ stage of the DaSA SA process was a refined SA Framework, comprising a set of sixteen Sustainability Objectives, supported by ‘Decision-aiding questions’ and indicators. The Scoping Report was produced in close liaison with statutory environmental agencies (Natural England, the Environment Agency and Historic England).

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<sup>1</sup> In accordance with Reg. 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

13. Table 1 below summarises the assessment of the potentially significant effects of the DaSA policies on the SA Objectives. The SA Objectives are in bold and italics. The DaSA policies and the detailed appraisal of them can be found in Appendices 3 and 4 of the Main Report.

Table 1: Summary of the Likely Significant Effects of the DaSA on the SA Objectives

<b>Sustainability Appraisal Objectives</b>	
<b>1</b>	<p><b><i>Ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home</i></b></p> <p>The significant effects on this SA Objective are beneficial. The Plan successfully identifies a good supply of site-specific deliverable opportunities to meet the housing requirements of the Core Strategy for the relevant parts of the District (i.e. the urban areas and villages not covered by Neighbourhood Plan areas). These support sympathetic accommodation of housing growth in sustainable locations and appear likely to be deliverable and viable. Policy provision setting out how the supply of suitable sites will be maintained across the District complements allocations, as does the identification of development boundaries which allows for small scale schemes on unidentified sites.</p>
<b>2</b>	<p><b><i>Improve the health and well-being of the population and reduce inequalities in health</i></b></p> <p>Overall effects of the Plan on the health objective are positive. Positive effects stem from a number of housing policies that aim to improve the living environment, including the policy for accessible and adaptable homes and for specialist housing for older people. Environmental policies also have beneficial effects, such as policies on environmental pollution and biodiversity &amp; green infrastructure. Site specific policies that lead to the provision of, or are readily accessible to, green space (with its acknowledged health benefits) and other recreation facilities are also beneficial.</p>
<b>3</b>	<p><b><i>Reduce crime and the fear of crime</i></b></p> <p>Effects on this objective are overwhelmingly neutral. Those positive effects that have been identified relate to specific sites, their proximity to a police station and/or the extent to which they are to be specifically designed to incorporate a degree of informal surveillance/overlooking of public areas.</p>
<b>4</b>	<p><b><i>Reduce deprivation and social exclusion</i></b></p> <p>Most policies have been judged to have either a neutral, or a minor beneficial effect, on reducing deprivation and social exclusion. Most significant is the policy for widespread provision of accessible and adaptable homes and a proportion of affordable homes accessible for disabled people, as well as the policy for specialist housing for older people. Depending on their location, a significant number of sites identified are considered to have positive effects due to promoting integration with existing communities. The impacts of recreational and social facilities serving Sidley, the most deprived part of Bexhill, in particular, are positive.</p>

5	<p><b><i>Raise educational achievement levels and develop the opportunities for lifelong learning</i></b></p> <p>Overall, there are beneficial effects for this objective from the Plan. There has been a considerable focus on locating residential development in locations with good access to education facilities. This is in accordance with the service centre approach.</p>
6	<p><b><i>Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities</i></b></p> <p>Cumulatively, the Plan has a positive effect on economic growth. In particular, policy DEC3 offers valuable protection to existing employment sites, whereas Policy DCO1 similarly offers some protection to sites of social or economic value. Policy DIM1 on comprehensive development is considered to be likely to be beneficial on balance in promoting mixed-uses sites that secure a range of benefits, including economic, in addition to residential. Policies that define town centre and commercial areas (BEX12, BEX13, BEX14, and BEX16) are viewed to have a positive effect on economic growth and competitiveness, while site allocations for business development, most notably BEX1, provide significant opportunities for creating jobs to meet local needs.</p>
7	<p><b><i>Improve accessibility to services and facilities for all ages across the District</i></b></p> <p>Overall, there are beneficial effects for this objective from the Plan. Insofar as the Core Strategy distribution of development was primarily a 'service centre' based approach, given that the DaSA follows on from, and conforms with, this strategy, there has been an in-built focus on locating development in locations with good accessibility to education facilities, particularly primary schools. The overwhelming majority of sites score positively in this respect. Policies to strengthen town and district centres in Bexhill, as well as detailed policies to protect community facilities also positively support this objective, as do locational criteria for older persons' housing.</p>
8	<p><b><i>Encourage and facilitate increased engagement in cultural and leisure activities</i></b></p> <p>Generally, the Plan has a positive effect on this objective. Many generic policies are neutral or not relevant to this objective, although Policy DCO1 which seeks to protect sites of social value is a notable positive effect. Most site allocations are positive, since their proximity to cultural and leisure facilities have been a key factor in the consideration of their suitability. Perhaps the most significant policies in the Plan in terms of Objective 8 is BEX15, which defines a 'Bexhill Cultural Area' where arts, culture and tourism will be the primary focus, and BEX4 for a new leisure facility.</p>
9	<p><b><i>Improve efficiency in land use and encourage the prudent use of natural resources</i></b></p> <p>Whilst the balance of effects on this objective is positive, the scale of development required inevitably means that development of greenfield sites will be necessary. Therefore, the significance of beneficial effects is reducing over time as previously developed land and infill opportunities unfortunately become scarcer. Viable schemes for suitable brownfield site opportunities are identified, including the large redundant former prison/training centre site at Northeye on the edge of Bexhill. Site allocations generally seek to make best use of developable land, consistent with providing requisite living conditions and amenities.</p>

10	<b><i>Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage</i></b>
	In a rural District that is accommodating significant growth, positive scores for <i>reducing road congestion</i> are difficult to achieve, particularly as public transport options also tend to be limited or infrequent, and subject to increasing economic pressures nationwide. Nonetheless, the Plan has endeavoured to increase travel choice by prioritising accessible locations and by including requirements for improvements in pedestrian and cycle facilities and, for major schemes bus services, in site allocations.
11	<b><i>Reduce emissions of Greenhouse gases</i></b>
	An increase in the number of households and businesses in the District has the potential for an adverse effect on reducing greenhouse gas emissions, although the Plan makes positive efforts to reduce the need to travel by car on a site-by-site basis by promoting walking and cycling. Although no specific sites for renewable energy developments have been identified, a positive, criteria-based policy is included. The Plan will probably avoid a net loss of trees, since all areas of woodland have been avoided and several policies require enhancement.
12	<b><i>Minimise the risk of flooding and resulting detriment to people and property</i></b>
	The effects on objective 12 are overwhelmingly positive, notably policy DEN5. Its emphasis on sustainable drainage (SuDS), as well as the means to achieve this, is a major positive. Promotion of wetland habitats under Policy DEN4, which may have a multi-functional benefit as SuDS, may also be indirectly beneficial. The majority of site allocations have successfully avoided or mitigated significant flood risk. Scores are therefore generally positive and reduce the proportion of properties at risk from flooding in the District.
13	<b><i>Maintain, improve and manage water resources in a sustainable way</i></b>
	The Plan, particularly Policy DRM1, will have a positive effect on water efficiency by applying a higher water efficiency standard. Site policies are also generally positive, avoiding groundwater source protection zones / aquifers and generally positively incorporating watercourses and wayleaves within layouts.
14	<b><i>Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats</i></b>
	The Plan will have a generally positive and beneficial overall effect on objective 14, particularly via policy DEN4 'Biodiversity and green space', but also DEN5, HAS1 and HAS4. The positive measures required by DEN4, as well as Core Strategy EN5, on which it is based, include a focus on provision of priority habitats and connectivity, as well as the avoidance of harm to existing ecological features. These sentiments have generally been reflected in site layouts and parameters which also positively address the issue; hence, there are a number of positive scores for this objective in relation to site policies.

15	<b><i>Protect and enhance the high quality natural and built environment including landscape and townscape character and particularly the protection of the High Weald AONB.</i></b>
	Several DaSA policies are identified as having positive effects on townscape and built environment. Policies DEN1 and DEN2 have a notably positive effect on landscape and High Weald AONB character, supported by DEN3, DEN4 and DEN7. Policies DHG7, DHG9, DHG11 and DEC1 will have positive effects in terms of townscape. In addition, many site-specific policies are also deemed to have a positive effect. This is despite the fact that many are actually greenfield sites within the AONB itself. This is because sites have been carefully selected to avoid negative landscape impacts as far as possible on key features of the High Weald AONB. Positive treatments have included landscaping to enhance the immediate environment.
16	<b><i>Reduce waste generation and disposal, and achieve the sustainable management of waste</i></b>
	Effects on objective 16 are largely neutral. There are two household waste recycling facilities in the District – at Mountfield (on the A21 north of Battle) and at Pebsham (Between Bexhill and Hastings). Development locations accessible to these two sites, and to a secondary extent, accessible to the more numerous ‘bring’ recycling sites are deemed to score more positively against this objective. Policy DHG7 is a new policy that requires provision of recycling facilities is also a notable positive.

### **Statement on the difference the SA process has made**

14. The SA process has been a fundamental tool in the development of the Development and Site Allocations Local Plan (DaSA). The SA has provided evidence to inform decision making and helped with developing options. It has also been crucial in helping to assess any changes or suggested changes to the Plan policies as they develop and are subsequently refined. It acts as a way to highlight any possible negative effects and ensure that, where possible, the policies include mitigation of these effects.

### **How to Comment on the SA Report**

15. Persons and/or organisations will be able to make representations on this SA report, including statements of objection or support, via the consultation on the proposed submission Development and Site Allocations Local Plan (“DaSA”). Please refer to the Council’s website for details:  
<http://www.rother.gov.uk/DaSA>

## 1. CONTEXT

### 1.1 Introduction

- 1.1.1 The Council is required by law to produce a Sustainability Appraisal (SA) (incorporating Strategic Environmental Assessment (SEA)) for its Local Plan. This is the Sustainability Appraisal of the Development and Site Allocations Local Plan (DaSA) - part two of Rother District Council's Local Plan.

### 1.2 The Local Plan for Rother District

- 1.2.1 Rother District Council's Local Plan is being prepared in two parts:  
Part 1: The Local Plan Core Strategy ("the Core Strategy")  
Part 2: The Development and Site Allocations Local Plan ("the DaSA")
- 1.2.2 The Core Strategy is the first, principal part of the Council's Local Plan to 2028. It was adopted in 2014. It sets out the Council's strategic policies, including the overall spatial strategy, as well as higher-level "core" policies for a number of strategic matters, relating to sustainable resource management, communities, local housing needs, economy, environment, transport and accessibility and implementation and monitoring. The spatial strategy sets out not only the overall quantum of housing and business growth, but also the distribution of housing growth between individual towns and villages.
- 1.2.3 The Core Strategy was subject to its own Sustainability Appraisal process. Its SA reports can be found at <http://www.rother.gov.uk/sa>.
- 1.2.4 The DaSA, as the second part of the Local Plan, carries forward the spatial strategies, strategic objectives and core policies set out in the 'Core Strategy'. It will achieve this by reviewing existing site allocations and development boundaries, and by allocating specific areas of land for particular uses in line with the development provisions of the Core Strategy. It will also set out more detailed policies where these are needed to provide guidance for the effective management of development in relation to key issues, such as housing needs, including affordable housing thresholds, employment and tourism sites, development in the countryside, housing standards, landscape, biodiversity and other local environmental matters.
- 1.2.5 It is noted that the NPPF 2012 (para.167) states:  
*"Assessments should be proportionate, and should not repeat policy assessment that has already been undertaken."*
- 1.2.6 Given the DaSA is being prepared to implement the Core Strategy, the current SA process does not seek to re-visit the assessment undertaken for the Core Strategy. It instead focuses on the elements relevant to the DaSA itself, including through the consideration of reasonable alternatives for the Plan.

### **1.3 Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)**

- 1.3.1 A sustainability appraisal is a systematic process that must be carried out during the preparation of a Local Plan. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.
- 1.3.2 This process is an opportunity to consider ways by which the Plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. By doing so, it can help make sure that the proposals in the Plan are the most appropriate given the reasonable alternatives. It can be used to test the evidence underpinning the plan and help to demonstrate how the tests of soundness have been met. Sustainability appraisal should be applied as an iterative process informing the development of the Local Plan.
- 1.3.3 [Section 19 of the Planning and Compulsory Purchase Act 2004](#) requires a local planning authority to carry out a sustainability appraisal of the Local Plan during its preparation. More generally, [section 39 of the Act](#) requires that the authority preparing a Local Plan must do so “with the objective of contributing to the achievement of sustainable development”.
- 1.3.4 Sustainability appraisals incorporate the requirements of the [Environmental Assessment of Plans and Programmes Regulations 2004](#) (commonly referred to as the ‘Strategic Environmental Assessment Regulations’), which implement the requirements of the [European Directive 2001/42/EC](#) (the ‘Strategic Environmental Assessment Directive’) on the assessment of the effects of certain plans and programmes on the environment. Sustainability appraisal enables the relative sustainability merits of a plan and reasonable alternatives to be considered.

### **1.4 The SA Stages and Process as applied to the DaSA**

- 1.4.1 The SA/SEA is an on-going and iterative process that feeds into and informs plan-making.
- 1.4.2 The Council is required by law to produce a Sustainability Appraisal (SA) (incorporating Strategic Environmental Assessment (SEA)) for all of its Local Plan (2011-2028) documents except for the Statement of Community Involvement, the Annual Monitoring Report, Supplementary Planning Documents (SPDs) and the Local Development Scheme.

- 1.4.3 The process of SA is set out in the national Planning Practice Guidance, as in the Figure 1, which sets out a number of stages to the SA.
- 1.4.4 As noted above, the scope of the SA for the DaSA is set within the context of the various SA reports produced to support the Local Plan Core Strategy, which are available to view at <http://www.rother.gov.uk/sa>.
- 1.4.5 Regulation 4 of the Environmental Assessment of Plans and Programmes Regulations 2004 defines certain organisations with environmental responsibilities as consultation bodies. In England the consultation bodies or 'SEBs' (Statutory Environmental Bodies) are:
- Historic England<sup>2</sup>
  - Natural England and
  - The Environment Agency
- 1.4.6 The first stage of the DaSA SA was the preparation of a Scoping Report which set out the framework for the SA. In line with legislation, the strategic environmental bodies (SEBs) - The Environment Agency, Historic England and Natural England - were consulted. Also, although not required by the Act, comments were also welcomed from any persons or organisations wishing to participate.
- 1.4.7 An initial version of this report was therefore published on the Council's website in September 2014 for a consultation period of 6 weeks, and then a slightly amended version was published for a further 6 week period ending in February 2015. Comments were invited from interested persons or organisations. At the same time, the consultation bodies were specifically notified and invited to comment. In December 2015, the Council further consulted with the SEBs regarding further proposed amendments to the Scoping Report, and their comments were incorporated into a version published in February 2016. Finally, following further dialogue with the SEBs the final DASA SA Scoping Report was published in August 2016.
- 1.4.8 With reference to Figure 1, the SA Scoping Report represents *Stage A* in the process. It established the SA Framework for the DaSA. The SA Framework is set within the context of existing plans and policies, and an understanding of the current baseline situation is essential to help predict effects and identify key sustainability issues. The full DaSA SA Scoping Report can also be found on the Council's website at <http://www.rother.gov.uk/sa>.
- 1.4.9 *Stage B* is 'Developing and Refining Alternatives and Assessing Effects' and *Stage C* is preparing the Sustainability Appraisal (SA) report.
- 1.4.10 With regard the SA Report, the local planning authority must consult the consultation bodies and other parties who, in its opinion, are affected or likely to be affected by, or have an interest in, the decisions involved in the assessment and adoption or making of the plan.

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<sup>1</sup>Title from 01/04/15, formerly known as English Heritage.

- 1.4.11 The PPG sets out that the local planning authority may also want to consult those they are inviting representations from, as part of the development of the Local Plan itself. The Sustainability Appraisal Report, including the Non-Technical Summary, must be published alongside the draft Local Plan for a minimum of six weeks.
- 1.4.12 The SA of the DaSA Options and Preferred Options was consulted upon alongside that version of the Local Plan. The SA Report, which was published in November 2016 and accompanied the Regulation 18 - 'Options and Preferred Options' - version of the DaSA, met both Stage B and was an initial output as part of Stage C of the process.
- 1.4.13 Comments on the SA that was published alongside the Options and Preferred Options' DaSA at Regulation 18 stage are incorporated into Council's Consultation Statement. For ease of reference, the comments, as well as the Council's responses and recommendations, are reproduced as Appendix 5. It can be seen that there were relatively few comments; there were general comments, mainly about the baseline and trends, comments on the assessments of some sites' policies and on some assessments of rejected sites. Where it is acknowledged that amendments are appropriate, they have been incorporated into this updated SA Report.
- 1.4.14 This further SA Report, dated September 2018, has been prepared to inform and accompany the Regulation 19 – 'Proposed Submission' – version of the DaSA. It reflects updates made to the DaSA since consultation on the 'Options and Preferred Options' document and is effectively a refinement to the earlier SA Report, also being within *Stage C* in the process.
- 1.4.15 This SA Report should be read in the context of earlier reports, especially in respect of the development of the sustainability background and identification of sustainability issues relevant to Rother district.
- 1.4.16 The conclusions of the SA/SEA process are intended to give an overview of the suitability of sites for particular uses in terms of broad sustainability principles. They inform policy development and complement the detailed site assessments. The process for bringing the two assessments together is discussed in separate 'DaSA Sites Methodology Background Paper'.

## **1.5 Compliance with SEA Directive/Regulations**

- 1.5.1 The SEA Regulations set out a legal assessment process that must be followed. In light of this, Table 2 sets out the relevant requirements of the SEA Regulations and explains how these have been satisfied.

Figure 1: Sustainability Appraisal Process for Local Plans

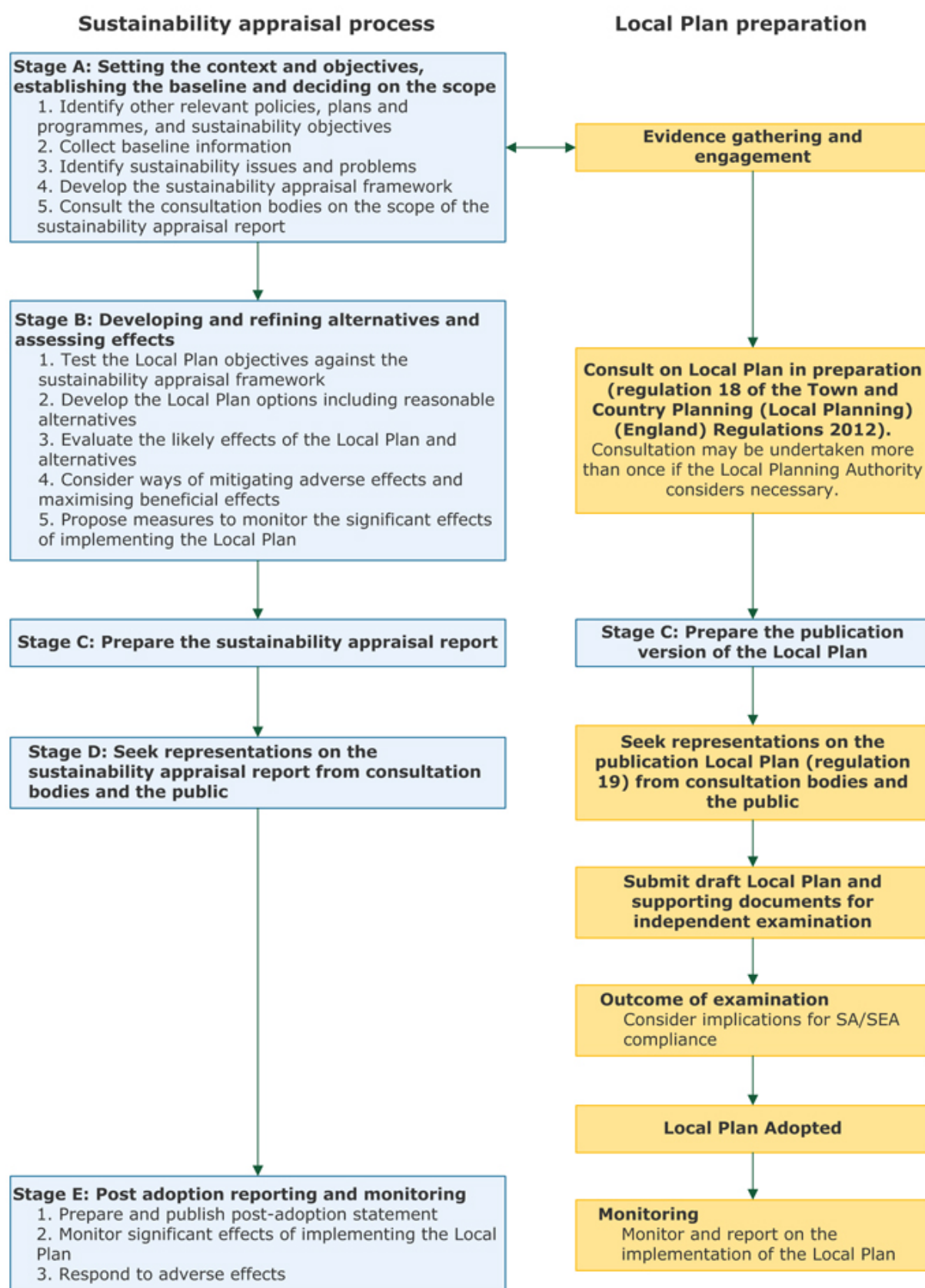


Table 2: SEA Regulations Requirements Checklist (Source: PPG)

Strategic Environmental Assessment Regulations requirements checklist	Plan-making stage	Where met?
<p>Preparation of environmental report (regulation 12)</p> <p>Preparation of an environmental report that identifies, describes and evaluates the likely significant effects on the environment of implementing the plan or programme and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme (regulation 12(2)). The report shall include such of the information referred to in Schedule 2 as may reasonably be required, taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in the process to avoid duplication of the assessment (regulation 12(3)). Information may be provided by reference to relevant information obtained at other levels of decision-making or through other EU legislation (regulation 12 (4)). When deciding on the scope and level of detail of information to be included in the environmental report the consultation bodies should be consulted.</p>	For Local Plans, see Figure 1.	Rother Local Plan 'Development and Site Allocations Plan' Sustainability Appraisal Scoping Report (August 2016). Updated in the DaSA Options and Preferred Options Sustainability Appraisal, November 2016 and further updated in this Report – Chapters 3 and Appendix 2.
<p>The information referred to in Schedule 2 is:</p> <p>a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.</p>	For Local Plans, see Figure 1.	Rother Local Plan 'Development and Site Allocations Plan' Sustainability Appraisal Scoping Report (August 2016). Updated in the DaSA Options and Preferred Options Sustainability Appraisal, November 2016 and further updated in this Report – Chapters 2, and Appendix 1.
<p>b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.</p>	For Local Plans, see Figure 1.	Rother Local Plan 'Development and Site Allocations Plan' Sustainability Appraisal Scoping Report (August 2016). Updated in the DaSA Options and Preferred Options Sustainability Appraisal, November 2016 and further updated in this Report – Chapters 3 and Appendix 2.

c) The environment characteristics of areas likely to be significantly affected.	For Local Plans, see Figure 1.	Rother Local Plan 'Development and Site Allocations Plan' Sustainability Appraisal Scoping Report (August 2016). Updated in the DaSA Options and Preferred Options Sustainability Appraisal, November 2016 and further updated in this Report – Chapters 3 and Appendix 2.
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives <a href="#">2009/147/EC (Conservation of Wild Birds)</a> and <a href="#">92/43/EEC (Habitats Directive)</a> .	For Local Plans, see Figure 1.	Rother Local Plan 'Development and Site Allocations Plan' Sustainability Appraisal Scoping Report (August 2016). Updated in the DaSA Options and Preferred Options Sustainability Appraisal, November 2016 and further updated in this Report – Chapters 2, and Appendix 1.
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	For Local Plans, see Figure 1.	Rother Local Plan 'Development and Site Allocations Plan' Sustainability Appraisal Scoping Report (August 2016). Updated in the DaSA Options and Preferred Options Sustainability Appraisal, November 2016 and further updated in this Report – Chapters 3 and Appendix 2.
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscapes and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.	For Local Plans, see Figure 1.	DaSA Options and Preferred Options Sustainability Appraisal, November 2016 and updated in this Report - Chapter 5. Appendices 3 and 4.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	For Local Plans, see Figure 1.	DaSA Options and Preferred Options Sustainability Appraisal, November 2016 and updated in this Report - Chapter 5. Appendices 3 and 4.

h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	For Local Plans, see Figure 1.	DaSA Options and Preferred Options Sustainability Appraisal, November 2016 and updated in this Report - Chapters 4 and 5. Appendices 3 and 4.
i) A description of measures envisaged concerning monitoring in accordance with regulation 17.	For Local Plans, see Figure 1.	Chapter 6.
ii) A non-technical summary of the information provided under the above headings.	For Local Plans, see Figure 1.	Non-Technical Summary.
Consultation procedures (regulation 13) As soon as reasonably practicable after their preparation, the draft plan or programme and environmental report shall be sent to the consultation bodies and brought to the attention of the public, who should be invited to express their opinion. The period within which opinions must be sent must be of such length as will ensure an effective opportunity to express their opinion.	For Local Plans, see Figure 1.	For the SA, November 2016, alongside DaSA 'Options and Preferred Options' consultation and this Report is being consulted upon alongside the Proposed Submission DaSA.
Information as to adoption of plan or programme (regulation 16) As soon as reasonably practicable after the plan or programme is adopted, the consultation bodies, the public and the Secretary of State (who will inform any other EU Member States consulted) shall be informed and the following made available: <ul style="list-style-type: none"> <li>the plan or programme adopted</li> <li>the environmental report</li> <li>a statement summarising:               <ul style="list-style-type: none"> <li>(a) how environmental considerations have been integrated into the plan or programme;</li> <li>(b) how the environmental report has been taken into account;</li> <li>(c) how opinions expressed in response to:                   <ul style="list-style-type: none"> <li>(i) the invitation referred to in regulation 13(2)(d);</li> <li>(ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;</li> </ul> </li> <li>(d) how the results of any consultations entered into under regulation 14(4) have been taken into account;</li> <li>(e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</li> </ul> </li> </ul>	For Local Plans, see Figure 1.	To be done in a Post DASA Adoption.

(f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme. (regulation 16)		
Monitoring of implementation of plans or programmes (regulation 17) Monitoring of significant environmental effects of the plan's or programme's implementation with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action (regulation 17 (1)). Monitoring arrangements may comprise or include arrangements established for other purposes (regulation 17 (2)).	For Local Plans, see Figure 1.	On-going, principally through the Local Plan Monitoring Report.

## **2. CONTEXT REVIEW**

### **2.1 Links to Other Strategies, Plans, Policies, Programmes and Sustainability Objectives**

2.1.1 Schedule 2 of the SEA Regulations requires, inter alia:

- (1) “an outline of the...relationship with other relevant plans or programmes”; and
- (5) “the environmental protection objectives established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation”

2.1.2 Appendix 1 outlines the relevant links with other plans, policies programmes and sustainability objectives. These are sub-divided according to International, European, National, Regional, Sub-Regional / County and Local/District relevance.

2.1.3 Links with other plans and programmes have been continually reviewed and updated throughout the sustainability appraisal process as applied to the Rother District Local Plan 2011-2028, including the various iterations of the Core Strategy Sustainability Appraisal as well as the DASA SA Scoping Report (August 2016) and the DASA Options & Preferred Options SA. . Appendix 1 of this Report provides a further update and review.

2.1.4 The following sections, 2.2 and 2.3, comprise an updated summary of the main international and national policies, plans and programmes. Section 2.4 updates ‘Key Local Plans, Policies and Programmes’ that have been published subsequent to the Core Strategy SA (July 2013) to provide an up-to-date local context for this SA.

### **2.2 Key International Plans, Policies and Programmes**

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

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

- 2.2.3 There are a wide range of other EU Directives relating to issues such as water quality, waste and air quality, most of which have been transposed into UK law through national-level policy; however, the international directives have been included in Appendix 1 for completeness.

## 2.3 Key National Plans, Policies and Programmes

- 2.3.1 The more significant national documents in terms of the policy context for the DaSA are the National Planning Policy Framework (NPPF) and the supporting Planning Practice Guidance.

### The National Planning Policy Framework (NPPF)

- 2.3.2 National planning policies are contained in the NPPF. Local planning policies should be consistent with national planning policies, unless there are reasons justifying a local exception. The first NPPF, published in 2012, has recently been revised through the publication of a new NPPF in July 2018. While the DaSA Local Plan has been prepared to accord with the 2012 NPPF, notably in terms of housing provisions (which are set by the current Core Strategy), regard is also had to the 2018 NPPF to ensure that the DaSA is compatible with the Government's most recent interpretation of sustainable development at the national level. NPPF 2018 sets out information about the purposes of local plan-making at paragraph 15:

*"The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings."*

- 2.3.3 Of most relevant to SAs, the NPPF<sup>3</sup> also requires Local Plans to 'be prepared with the objective of contributing to the achievement of sustainable development.' It adds<sup>4</sup>, 'Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements.'
- 2.3.4 The NPPF requires local planning authorities to set out the strategic priorities for the area in the Local Plan. This should include strategic policies which set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision, in line with the presumption in favour of sustainable development, for:
- housing (including affordable housing), employment, retail, leisure and other commercial development;
  - infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
  - community facilities (such as health, education, cultural infrastructure);

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<sup>3</sup> Paragraph 16, NPPF, 2018

<sup>4</sup> Paragraph 32, NPPF, 2018

- conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

- 2.3.5 The NPPF notes that non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies. This is essentially the role of the DaSA.
- 2.3.6 A separate 'Planning policy for traveller sites' was first published in 2012 and updated in 2015 and should be read in conjunction with the NPPF.
- 2.3.7 NPPF 2018 is so recent that it can reasonably be regarded as taking due account of other current national plans, policies and programmes.

#### The Planning Practice Guidance (PPG)

- 2.3.8 Together with and in support of the NPPF, the PPG sets out what the Government expects of local authorities. The overall aim is to ensure the planning system allows land to be used for new homes and jobs, while protecting valuable natural and historic environments.
- 2.3.9 Plan makers must have regard to national policies and advice contained in the guidance when developing their plans. The guidance is also a 'material consideration' when taking decisions on planning applications. This means that if a local policy is deemed out of date, local authorities may be directed by the national guidance's requirements.
- 2.3.10 Some updates to the PPG are still awaited following the publication of the recent NPPF, 2018.

#### Extensions of International (Natura 2000) Sites

- 2.3.11 There have been recent extensions to the international sites network in Rother. The international sites are illustrated on Map 18 in the Appendix 2 Baseline information.
- 2.3.12 The Pevensey Levels SAC was designated in early 2016, being upgraded from proposed SAC status, and reflecting the boundary of the pre-existing Pevensey Levels Ramsar.
- 2.3.13 The Dungeness, Romney Marsh and Rye Bay SPA was expanded in March 2016 so as to incorporate and replace the 'Dungeness to Pett Level SPA'. In addition, a marine extension to the SPA has been made, which extends virtually the full length of Rother District's coastline, with the only exclusion being the marine area opposite Norman's Bay and the south-west corner of the District. There is a plan of the SPA in Appendix 2 (Map 18, Appendix 2).

- 2.3.14 The implications of these designations, as well as up-to-date information about other designated international sites in the locality are considered as part of the Habitats Regulations Assessment process, referred to below.

## **2.4 Key Local Plans, Policies and Programmes**

- 2.4.1 The most relevant local plans, policies and programmes that bear upon the 'Sustainability Appraisal, aside from the Core Strategy, are the local plans of adjacent authorities, especially that of Hastings Borough Council, as the fringes of the town spill over into Rother district. It has an adopted Core Strategy and a Development Management Plan, with an Area Action Plan in preparation. All are supported by their own Sustainability Appraisals. Folkestone and Hythe (formerly Shepway) District Council's Local Plan is also particularly relevant, as the Dungeness Complex of Natura 2000 sites straddle the local authority boundary and are being considered jointly with this Council. The Wealden Local Plan is also relevant, as the Pevensey Levels straddles the two Councils' boundaries.

### Habitats Regulations Assessment

- 2.4.2 A further Habitats Regulations Assessment (HRA), taking account of the above-mentioned changes in designations and other relevant circumstances, has been undertaken for the DaSA Local Plan and has informed this SA.

### Supplementary Planning Documents (SPDs)

- 2.4.3 The Council has three adopted SPDs. While these were all prepared under the 2006 Local Plan, they all provide levels of detail that are relevant, to varying degrees, to new Local Plan policies. These relate to Affordable Housing (2006), North East Bexhill (2009) and Camber Village (2014).

### Community Infrastructure Levy (CIL)

- 2.4.4 The Community Infrastructure Levy allows local authorities in England and Wales to raise funds from developers undertaking new building projects in their area to fund a wide range of infrastructure that is needed to support new development. This includes transport schemes, schools, flood defences, hospitals and other health and social care facilities, parks, green spaces, leisure centres and other community and cultural facilities. As almost all development has some impact on the need for infrastructure, services and amenities, this tariff-based approach is seen as an effective, quicker and fairer framework to fund new infrastructure to support growth.
- 2.4.5 The CIL Charging Schedule came into effect on 4 April 2016 and applies to all specified development permitted after this date, subject to national exemptions as set out in Regulations.

### Infrastructure Delivery Plan (IDP)

- 2.4.6 The Infrastructure Delivery Plan (IDP) formed part of the evidence base for the Core Strategy. The IDP identifies the infrastructure needed to support development proposed by the Local Plan and assists with project managing the planning, programming and funding of work required to ensure that infrastructure is provided in a timely manner.

### Proposed High Speed 1 Extension

- 2.4.7 Consideration is currently being given to a High Speed 1 extension would connect high speed rail services from Ashford via Hastings to Eastbourne, via Bexhill and Rye. It would enable more frequent services and shorter travel times to London via HS1 and to Brighton which will support regeneration of Hastings and Bexhill and improve access to towns and villages along the route.
- 2.4.8 An economic case has been made and feasibility work in relation to the reconfiguration of lines at Ashford Station is underway. However, it could not be introduced until towards the end of Plan period, as it is also subject to improvements in line speeds and new rolling stock.

### **3. SUSTAINABILITY ISSUES**

#### **3.1 Introduction**

- 3.1.1 The Environmental Assessment of Plans and Programmes Regulations 2004 sets out the formal requirements of an 'environmental report' which is required to highlight any existing environmental problems which are relevant to the plan or programme.
- 3.1.2 The identification of sustainability issues in Rother is an on-going process rather than a single 'event'. They were identified initially through the Core Strategy SA, updated through the SA of the 'Options and Preferred Options' document and further updated to take account of:
  - a) more recent statistics for the baseline indicators, as set out at Appendix 2
  - b) a review of relevant Policies, Plans and Sustainability Objectives
  - c) knowledge gained through the on-going preparation of the Local Plan
- 3.1.3 The identified issues reflect in the objectives set out in the Sustainability Appraisal Framework in section 4.1.
- 3.1.4 Whilst the objectives have been categorised as 'Economic', 'Social' or 'Environmental', it should be noted that this sub-division is not necessarily a clear distinction - to some extent, all objectives have an environmental, social and economic implication. However, for the purposes of the assessment, the objectives have been apportioned to the category where effects are considered most likely to be significant.

#### **3.2 Summary of baseline changes and trends**

- 3.2.1 This SA includes an updated baseline (from the DaSA Options and Preferred Options SA, 2016) at Appendix 2, with the more significant updates summarised below, by theme.
- 3.2.2 The following trends are regarded as being of particular note for the DaSA and its sustainability appraisal:
  - a) There has been a gradual upward trend in the lower quartile house price to earnings ratio up to 2017, even though now lower than the East Sussex and the South East average. Moreover, this is likely to continue to be a major issue over the plan period, to be mitigated by improved access to a wider range of job opportunities and housing, including affordable housing.
  - b) Some key economic indicators are positive, with GVA rates of local businesses becoming level with East Sussex (2016) and business survival rates surpassing county, regional and nationwide levels (2015). Also, there is a consistent trend in terms of a falling unemployment rate

and the number of people claiming benefits. Even so, there will be challenges, as Rother's businesses remain generally small in size with a comparatively small proportion of employees in professional occupations (see page 45 of Appendix 2). Furthermore, as a new table (on page 19 of Appendix 2) indicates, the number of young working age adults 18-34 is forecast to decline over the plan period.

- c) The demographic profile of the district is set to age noticeably, with most of the absolute change up to 2028 being in the age group 75+ (see page 19 of Appendix 2), which may explain a projected increase in the proportion of residents with long term illnesses (see page 25 of Appendix 2). This will present key challenges in terms of the types of housing needed and the provision of a range of social services.
- d) Further development and growth inevitably will pose issues in terms of environmental impacts in particular, including landscape and biodiversity impacts (especially in relation to designated areas), and additional traffic generation (especially in Bexhill where most development is to be located).

### **3.3 Environmental issues**

#### Waste & Recycling (Sustainability Appraisal Framework (SAF) Objectives 9, 16)

- 3.3.1 The East Sussex Joint Waste Strategy 2014 to 2025 reveals that since 2006, the County has doubled the amount of waste that is reused, recycled and composted and reduced waste sent to landfill by over 90%. By 2015/16, the County recycled, composted, reused or recovered energy from 95% of household waste and only 5% went to landfill (0.3% in Rother). These figures are borne out in the information in Appendix 2 (SA Objective 16). Pebsham Landfill Site between Bexhill and St Leonards was the last active site in the County. The last section of this site closed in November 2013 and is currently undergoing restoration as part of proposals to incorporate the site into the Combe Valley Countryside Park. There are no plans for any future landfill or land raise sites in East Sussex. Small quantities of waste are currently sent to landfill in West Sussex. The Waste Authority is working with neighbouring authorities and contractors to reduce this.
- 3.3.2 According to latest statistics (2015/16) Rother recycles 26.3% of total household waste, above the East Sussex level of 24.7%. Rother also composts 20.4% of total household waste, above the East Sussex figure of 16.7%.
- 3.3.3 Despite a lot of good progress, the average East Sussex household still creates around one tonne of waste and recycling each year, that's some 250,000 tonnes of waste in total. The recycling targets set out in the Joint Waste Strategy are 50% by 2020 and 60% by 2025.

- 3.3.4 The household waste per head (kg) is low in Rother (383kg per annum) when compared to the East Sussex figure of 450kg per annum. This equates to a slight downward trend for both Rother and East Sussex during the last 5 years, whereas between 2008 and 2013 Rother's household waste was slightly increasing.
- 3.3.5 It should be noted that as of 2016/17, household waste accounted for only 21% of the total solid waste arising in East Sussex and Brighton & Hove, with waste from construction, demolition and excavation, as well as commercial, industrial and hazardous waste making up the remainder. Whilst there are no figures available for Rother, these county figures are clearly significant for all local authorities in East Sussex.

#### Landscape Quality (SAF Objective 15)

- 3.3.6 The High Weald AONB Management Plan, County Landscape Assessments and the Green Infrastructure Study all highlight the key issue of ensuring the District's high landscape quality is maintained as well as enabling and encouraging people to value and enjoy the natural environment as a whole.
- 3.3.7 Some 83% of Rother District falls within the High Weald Area of Outstanding Natural Beauty reflecting its national landscape importance. The High Weald AONB Management Plan identifies the key characteristics of the designation area (see Map 26 in Appendix 2) as well as objectives to maintain and enhance the area.
- 3.3.8 There are three national landscape character areas in the District (see Map 24 in Appendix 2). The District can be sub-divided further into local landscape character areas (see Map 25 in Appendix 2) which are largely defined by river valleys. The County Council's Landscape Character Assessments identify problems and pressures for each character area, formulate a vision and provide landscape action priorities.

#### Biodiversity (SAF Objective 14)

- 3.3.9 Biodiversity is, in short, the variety of life. The Biodiversity Action Plan for Sussex notes that the County has a wide range of habitats including flower-rich meadows, ancient wooded valleys, coastal sand dunes and shingle. Many of these habitats have declined in area and quality over the past 100 years. In Sussex, 508 Biodiversity Action Plan priority species have been recorded (that's more than 44% of the UK total). Species are listed as a result of being globally threatened and/or in rapid decline in the UK.
- 3.3.10 Within Rother, some 5% of the land area is classed as sites of international significance for nature conservation. These are at Pevensey Levels (Ramsar site and Special Area of Conservation) and in the Dungeness, Rye and Pett Level area (various sections designated Special Protection Area, Special Area of Conservation and Ramsar). In addition, there is a recent marine extension to the Dungeness, Romney Marsh and Rye Bay Special Protection Area (SPA) which extends across most of the marine area

fronting Rother District. These internationally designated sites are shown on Map 18 in Appendix 2. There are also nationally important Sites of Special Scientific Interest, principally covering the wetland areas near the coast, and a number of locally significant Local Wildlife Sites (previously called Sites of Nature Conservation Importance)

- 3.3.11 Some 16% of the District is covered by ancient woodland (see Map 22 in Appendix 2) compared to a figure of 2% for the UK, with another 8% coastal and floodplain grazing marsh. There are approximately 20 other Habitats of Principal Importance as listed under section 41 of the NERC Act 2006, or Special to Sussex habitats (see Maps 20 and 21 in Appendix 2).
- 3.3.12 A key issue in national and local policy is how overall biodiversity can be protected and enhanced.

#### Built Environment (SAF Objective 15)

- 3.3.13 Rother benefits from a high quality built environment. The District has over 2,100 Listed Buildings, 10 Conservation Areas, 46 Scheduled Monuments and 7 registered parks and gardens.
- 3.3.14 Key considerations are, how such historic quality can be conserved and enhanced, and how good quality design including the efficient use of resources, can be incorporated into the design of future buildings and public spaces. Rother has seven listed buildings classified by Historic England as being 'at risk', of which six are also scheduled monuments.

#### Climate Change (SAF Objectives 11, 12)

- 3.3.15 As outlined in the Environment Strategy for East Sussex, climate change is likely to lead to more extreme weather, such as more heat waves, storms and flash flooding, with significant implications for the costs of maintaining infrastructure. Flooding in Lewes, Uckfield and Robertsbridge in October 2000 caused around £130 million of damage. The 10 day heat wave in August 2003 caused an estimated 30 premature deaths in East Sussex, and there has been a notably long, hot summer in 2018. Areas at risk of flooding in Rother are focussed upon the coastal marshlands and river valleys.
- 3.3.16 In Rother each person created an average of 5.5 tonnes of CO<sub>2</sub> during 2015. This is above the East Sussex average of 4.4 tonnes, but below the national average of 5.6 tonnes. Domestic, road transport and industry/commerce sectors all contribute roughly equal amounts. Our sustainable world fair share will be only two tonnes per person by 2050. CO<sub>2</sub> emissions have reduced steadily year on year over the last 10 years; emissions in 2015 were nearly 30% less than in 2005.
- 3.3.17 Rother's mean average industrial and commercial annual consumption of gas is double that of East Sussex; 811,019 KWh compared to 381,817KWh, although the median average annual consumption is comparable to the South East Region and other districts in the county.

- 3.3.18 Further key issues stem from development on floodplains and how this affects our ability to adapt to the predicted impacts of climate change, as well as the need to reduce the use of natural resources, energy consumption and carbon emissions, improve energy efficiency and source more of the county's energy from our local renewable sources. At present there are 3,512 residential properties at risk within Flood Zone 3, which is roughly 8% of the total number of households in Rother.

#### Water Quality (SAF Objective 13)

- 3.3.19 Domestic water usage is generally high in the South East region compared to national usage. Based on a 2013 study, the Environment Agency (EA) has highlighted the entire area of the South East as 'water-stressed'. Both Southern Water and South East Water classify their areas as being in water stress in all scenarios.
- 3.3.20 Rivers in Rother District require biological and morphological work to enhance them and aquatic pollution, particularly rural drainage pollution, needs to be addressed so that the chemical quality of controlled waters in Rother improves.
- 3.3.21 The European Union's Water Framework Directive (WFD) (2000/60/EC) came into force in December 2000 and became part of UK law in December 2003. The WFD requires the water-bodies (both surface and groundwater) of all European Union member states to achieve 'good ecological status' or 'good ecological potential' by 2027. The Directive also requires that no water-bodies experience deterioration in status. Good status means good ecological status and good chemical status, as defined by a number of quantifiable quality elements. The Environment Agency has noted that information on water body status can be found using its Catchment Data Explorer: <http://environment.data.gov.uk/catchment-planning/>
- 3.3.22 Regarding bathing water quality, results from 2017 show Bexhill and Camber classified as 'good' for four consecutive years. Norman's Bay has been classified as 'excellent' since 2013, and Winchelsea is now classified as 'excellent', having risen from 'good' in 2015.

#### Air Quality (SAF Objective 10)

- 3.3.23 The wider environmental costs of air pollution, greenhouse gas emissions and noise from UK transport are estimated to be between £8.7bn and £19.3bn per year.
- 3.3.24 The East Sussex Environment Strategy noted that:

*'Road traffic continues to have impacts on the environment and local communities through air pollution, noise, and the emission of greenhouse gases; this means that environmental and health costs (and the associated health inequalities) continue to affect the county'.*

- 3.3.25 In their consultation comments, Natural England highlight that traffic growth on roads within 200m of sensitive designated habitats has the potential for development to impact on the natural environment (in particular designated habitats).
- 3.3.26 There are no Air Quality Management Areas (AQMA) in Rother at present. However, the review and assessment process for air quality will continue.

#### Prudent use of natural resources (SA Objective 9)

- 3.3.27 Planning Practice Guidance notes that ‘the planning system should protect and enhance valued soils and prevent the adverse effects of [unacceptable levels of pollution](#). This is because soil is an essential finite resource that provides important [‘ecosystem services’](#), for example as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution.’.
- 3.3.28 East Sussex has proportionally less Grade 1 and 2 classified agricultural land. This resource, along with Grade 3a, should be protected as this constitutes the best and most versatile agricultural land. In Rother, the majority of agricultural land is grade 3-4, although there is some higher quality grade 2 across the East Guldeford levels.
- 3.3.29 Largely because there is no recent industrial legacy, Rother District does not have a high stock of surplus brownfield land, as evidenced by the comparative lack of brownfield opportunities identified via the Council's Strategic Housing Land Availability Assessment (SHLAA) process or in the recent Brownfield Sites Register. The latter shows that there are 30 brownfield sites, totalling 13.23 hectares. This area has the capacity for a total minimum of 359 net dwellings.
- 3.3.30 Parts of rural Rother lack a mains gas connection. This can be a contributory factor towards fuel poverty, but can mean renewable energy options are a more attractive option.

### **3.4 Social issues**

#### Community Safety (SAF Objective 3)

- 3.4.1 The most recent figures (2011-16) show that Rother has generally low rates of criminal offences compared with the South East and England & Wales. However, the Ipsos Mori, Place Survey 2008/09 (see Appendix 2 baseline information) shows a comparatively high fear of crime, particularly after dark. Notwithstanding this, the same survey showed very high levels of satisfaction with Rother as a place to live. There are no updated recent statistics for fear of crime.

- 3.4.2 Whilst crime in Rother is low, IMD Crime deprivation mapping indicates higher levels of crime in the eastern wards of the District around Camber, and to a lesser extent central Bexhill, compared to other parts of the District.

#### Children & Young People (SAF Objectives 3, 5, 7)

- 3.4.3 In respect of child poverty specifically, parts of Bexhill and an area of Rye fall within the top 20% most deprived areas in the country (2015 Indices of Deprivation). As of 2015, 15.8% of Rother's children were living in poverty which is similar to 15.7% in East Sussex. These are slightly higher figures compared to the wider South-east region.

#### Culture & Leisure (SAF Objective 8)

- 3.4.4 Cultural and leisure opportunities can have a role in improving the quality of people's lives by promoting healthy lifestyles, supporting community cohesion, reducing crime and anti-social behaviour, supporting the economy and regeneration and contributing to environmental protection. The Hastings & Rother Leisure Facilities Strategy (2006 – 2007) mapped access to leisure facilities, which not surprisingly showed Bexhill to benefit from better access in comparison to rural areas of the District.
- 3.4.5 Leisure centre visits have increased in Rother, as have visitors to the De La Warr Pavilion in Bexhill.
- 3.4.6 However, levels of participation in sport are low in Rother compared to other areas, possibly as a consequence of having a comparatively older population. The Open Space Sport and Recreation Study (2007) found that there are also some quantity and access deficits of open space in the District, notably of larger green-spaces (100ha +) particularly around Bexhill.

#### Health (SAF Objective 2)

- 3.4.7 Rother has a higher proportion of people with long-term health problems or disabilities (22.7%) compared to East Sussex (20.6%). By 2028 these figures are expected to rise to 25.1%. Long-term health and disabilities problems are particularly apparent in Central Bexhill and Sidley.
- 3.4.8 Living Environment issues, which may be a factor in poor health, are also apparent in Central Bexhill, as well as the east of the District and the remote rural west of the District.
- 3.4.9 Statistics indicate that levels of physical inactivity are higher in Rother with 29.1% of adults exercising for less than 30 minutes a week, compared to 23.7% in East Sussex and 25.6% for England as a whole in 2016/17.
- 3.4.10 Rother's levels of childhood excess weight are similar to those of children in East Sussex; whereby 22% of children aged between 4-5 are classified as overweight or obese in Rother compared to 21% for East Sussex. Both these figures rise to 31% for children aged between 10-11.

- 3.4.11 The Community Plan recognises that an overall improvement in the health of Rother's residents and a reduction in health inequalities are important objectives. The Community Strategy for East Sussex highlights the importance of supporting older people to live independently for as long as possible. The East Sussex Strategic Partnership identified (2016-2019) the following as a strategic priority by 2026:

*'To protect and improve health and wellbeing and reduce inequalities.'*

- 3.4.12 A notable trend affecting health is the continuing overall aging population of the District, as illustrated by the high proportion of the population that will be not only over retirement age but also resident groups aged between 75-84 and 85+ which are projected to increase by 41% and 26.5% respectively, by the end of the plan period. This can be contrasted with a projected decrease in the number of residents aged between 18-34 and 45-64.

#### Housing (SAF Objective 1)

- 3.4.13 Despite being generally high, the median house price to earnings ratio has come down since the last baseline update in 2015 where it reached 9.45. After peaking in 2016, the ratio has come down to a level below that of East Sussex and the South East in 2017, sitting at 9.27, which has not been achieved for the duration of records since 2011. However, the lower quartile ratio measurement was slightly higher in 2017 than it was in 2015, suggesting that any improvements in affordability are not shared by all residents. As of 2017, Rother has 1,105 households on the housing register, a figure which has declined continuously from 1,973 in 2012.
- 3.4.14 Without an adopted DaSA in place, there would be serious consequences for the rate of housing delivery, and in turn the availability and affordability of housing for residents.

#### Transport & Accessibility (SAF Objectives 7, 10)

- 3.4.15 The East Sussex Strategic Partnership identified (2016-2019) the following as a strategic priority by 2026:

*'To improve sustainable travel choices and access to services and facilities within and between communities in the country.'*

- 3.4.16 Access to services in rural parts of the District is particularly constrained whilst public transport services are generally limited. The 2011 Census revealed that more than 64% of journeys to work in Rother are by car whereas less than 9% are by bus or train. The District shows a greater degree of car dependency in comparison to national, regional and county-wide figures, and a lower percentage of residents who cycle and walk each week for utility or leisure, according to 2015/16 figures.

- 3.4.17 Local Transport Plan 3 (2011-2026) identified several key priorities for Battle, Rye and rural Rother, including improvements to transport and improving access to key services in the area. Rother's proportion of households within 30 minutes travel time to services by public transport or walking are generally the same as East Sussex, although Rother has a noticeably smaller percentage of households within 30 minutes of a town centre, at 81% to the county figure of 89%. Similarly at the county level, it is recognised that access to services is constrained, in part, by the overall lack of broadband facilities across East Sussex, notably within rural areas.

#### Deprivation (SAF Objective 4)

- 3.4.18 The 2015 Indices of Multiple Deprivation rank Rother as the 148<sup>th</sup> most deprived local authority area out of the 354 in England. This had fallen from 132<sup>nd</sup> in 2010, thereby showing an improving situation. However, there are pockets of more severe deprivation in parts of Bexhill and in the eastern wards of the District.
- 3.4.19 Almost 10% of households are classed as being in fuel poverty, which is low compared to England, but slightly higher than the wider county and region.

### **3.5 Economic issues**

#### Education & Skills (SAF Objectives 5, 6)

- 3.5.1 According to the 2011 Census, educational attainment at GCSE level in Rother is relatively low, with 56% achieving 5+ GCSEs compared to 58% for East Sussex. Figures from 2015/16 show that East Sussex's attainment figure of 58% has remained the same, whilst later figures for Rother are not available. Furthermore, a high proportion of residents have no qualifications and a low proportion have the highest level of qualifications, although this may be at least partially age related. Education, skills and training deprivation is focused in Bexhill and the east of the District

#### Jobs (SAF Objective 6)

- 3.5.2 The unemployment rate, as of 2018, is higher in Rother compared to East Sussex and South East England. However, this rate has come down almost continuously from 7.9 in 2011/12 to 4.1 2017/18, which is virtually in line with the national trend. The 2011 Census showed that the percentage of long term unemployed in Rother was roughly the same percentage as for the South East and East Sussex. Employment deprivation is not evenly spread, but is particularly focused in Bexhill and on the east of the District.
- 3.5.3 The Employment Strategy and Land Review identifies a need for some 100,000sqm of employment floor-space for the District and this is reflected in Core Strategy policy. The Community Strategy for East Sussex also identified that rural employment opportunities need to be strengthened to help ensure a sustainable future for local rural communities.

- 3.5.4 Industries in Rother that employ a larger percentage of people compared with East Sussex, the South East and England are: Construction; Accommodation and food services; Financial, insurance and real estate industries.
- 3.5.5 Industries in Rother that employ a smaller percentage of people compared with East Sussex, the South East and England are: Agriculture, fishing, mining and utilities; Manufacturing; Information and communication; Professional, scientific and technical activities; Administrative and support services.

#### Local Economy & Regeneration (SAF Objective 6)

- 3.5.6 East Sussex exhibits generally low wage rates, significant levels of employment in lower paid sectors and a county GDP and GVA (Gross Value Added) which is less than two thirds of the national average. Firms in Rother are generally quite small compared to the wider County and region, although business survival rates (as measured between 2011 and 2015) are quite high compared to county and national figures. The High Weald AONB Management Plan (2014-2019) found that approximately 13% of businesses across the High Weald are classed as 'land-based' (compared to 3% nationally).
- 3.5.7 The relative peripherality of the District, compounded by constrained strategic transport links, serves to affect Rother's economic fortunes. 'Securing economic improvement' has been identified as one of the main strategic development issues in Rother's Core Strategy, which states:

*'Both enterprise and levels of earnings locally are very low, which impacts on prosperity and hence on standards of living. It also impacts on the capacity of the economy to support a wide range of job opportunities, especially for younger people looking to develop careers. Economic improvement is handicapped by relatively low skill levels, a weak commercial market and poor communications. Regeneration is a particular priority for the coastal areas of the district and adjoining Hastings. The current economic climate further compounds these issues in a relative weak local economy.'*

- 3.5.8 The East Sussex Strategic Partnership identified (2016-2019) the following as a strategic priority by 2026:
- 'To narrow the economic performance gap within and between communities in the county, and between the county and the region, in order to develop a thriving, diverse and sustainable economy where everyone can prosper.'*

#### Other 'Economic' Objectives

- 3.5.9 Other objectives can be considered to have an 'economic' focus as well as 'social' or 'environmental'. In particular, see the earlier social section for commentaries on objective 1 (Housing) and 4 (Deprivation and Social Exclusion), and the environmental section for commentary on objective 9 (Land Use Efficiency and Natural Resources).

## **4. APPRAISAL METHODOLOGY**

### **4.1 The SA Framework**

- 4.1.1 The production of an SA Framework is a key element of the SA process. The SA Framework provides a methodological framework for the appraisal of likely significant effects on the baseline.
- 4.1.2 It is appropriate to periodically update the SA Framework which needs to be set within the context of existing plans and policies. An initial version of the SA Framework was published in June 2008, accompanying Rother's emerging Core Strategy. The set of sixteen objectives in the SA Framework was an output originally derived from cooperative working with East Sussex County Council (ESCC) and the other East Sussex planning authorities. Indeed, ESCC continue to publish essential baseline information to inform these sixteen agreed objectives on their 'East Sussex in Figures' website, which are utilised to help inform the baseline information.
- 4.1.3 Whilst the 16 framework objectives derived from joint working with neighbouring authorities, Rother DC has developed its own set of 'decision-aiding questions' and 'indicators' and these have continued to evolve, in consultation with the Statutory Environmental Bodies (SEBs).
- 4.1.4 The DaSA SA Framework visible in Table 3 built upon the Core Strategy SA framework, and has been tailored specifically for the DaSA. It was published alongside the DaSA Sustainability Appraisal Scoping Report (August 2016).
- 4.1.5 A series of decision-aiding questions has been devised for each SA Objective in order to facilitate the appraisal process. Each question will be assessed in order to identify:
- Whether the principal impacts of the Option are positive or negative (clearly some may support one objective while conflicting with another, although this does not mean the impacts cancel one another out);
  - How these impacts may change over time (this cannot always be determined);
  - The relative magnitude of the impacts.
- 4.1.6 The final point, referring to magnitude, serves as an initial proxy for identifying the relative significance of the impacts. This activity also provides an initial opportunity to identify potential cumulative and synergistic impacts and to consider appropriate mitigation measures.

- 4.1.7 Whether an effect is considered likely to be significant will depend on whether it has a material impact on an SA Objective. The effects may be judged according to:
- Probability, duration, frequency and reversibility of the effects;
  - Cumulative nature of the effects;
  - Trans-boundary nature of the effects;
  - Risks to human health or the environment;
  - Magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
  - Value and vulnerability of the area likely to be affected due to: special natural characteristics or cultural heritage; exceeded environmental quality standards or limit values; intensive land use; or effects on areas having a recognised national, Community or international protection status;
  - How they contribute to achieving, or restrict the achievement of the various elements of the SA Objectives.
- 4.1.8 The data for indicators is monitored and published in a variety of sources including the ESCC East Sussex in Figures (ESiF) website, the ESCC Research & Information team, the Council's Annual Monitoring Report (AMR), the Council's Corporate Performance monitoring, the Council's Community & Economy Division, the Council's Waste Services, the Council's Annual Performance Plan (APP), as well as from third party organisations.
- 4.1.9 It is noted that an amendment has been made to the positioning of a decision-aiding question relating to air quality, in response to a comment by Natural England on the Options and Preferred Options DaSA Sustainability Appraisal.

Table 3: SA Framework for Development and Site Allocations Plan

1	<b>SA Objective:</b> Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	
<b>SEA Directive topics: Population, Human Health</b>		
<b>Decision-Aiding Questions</b>		<b>Indicators</b>
<p>Does the option/policy:</p> <ul style="list-style-type: none"><li>• Deliver affordable, sustainable housing in both urban and rural areas.</li><li>• Deliver development that is in keeping with local character.</li><li>• Deliver development to meet local housing need.</li><li>• Support sympathetic accommodation of housing growth in sustainable locations.</li><li>• Provide for an appropriate mix and range of housing where it is needed</li><li>• Appear likely to be viable, particularly in order to ensure the required proportion of affordable housing is achievable.</li><li>• Ensure new development is designed so as to make good quality place for people to live.</li><li>• Provide an opportunity for sustainable building.</li><li>• Incorporate an appropriate housing mix (i.e. meeting identified need for 1&amp;2 bed properties in rural areas).</li><li>• Meet any identified needs for specialist (e.g. older persons) housing.</li><li>• Result in the loss of land to another use that is currently, previously or could potentially have been valuable for residential purposes.</li></ul>		<ul style="list-style-type: none"><li>• Average property price : earnings ratio</li><li>• Delivery of affordable units</li><li>• Number of completions</li><li>• Number households on housing register</li><li>• Total homeless in priority need</li><li>• Population growth</li><li>• Population projections</li><li>• Population by age</li><li>• Household projections</li><li>• IMD Score (Barriers to Housing &amp; Services)</li></ul>
2	<b>SA Objective:</b> Improve the health and well-being of the population and reduce inequalities in health	
<b>SEA Directive topics: Human Health</b>		
<b>Decision-Aiding Questions</b>		<b>Indicators</b>
<p>Does the option/policy:</p> <ul style="list-style-type: none"><li>• Provide good access to health care and facilities (GP surgeries, dentist, hospitals).</li><li>• Protect and, where appropriate, increase provision of, and access to, leisure, natural green space and green/blue infrastructure, cultural activities, open space and recreation facilities.</li><li>• Promote physical activity and vibrant neighbourhoods.</li><li>• Have scope and potential to increase accessibility to recreation facilities, open space and accessible natural &amp; semi-natural green space via on-site provision to support healthy lifestyles.</li><li>• Have scope and potential for on-site provision of health facilities (where appropriate).</li><li>• Have scope and potential to create or enhance walking and cycling routes, both on-site and off-site, to enhance healthy lifestyles</li><li>• Access the PRoW network.</li><li>• Add to or improve PRoW network.</li><li>• Avoid adverse impacts of noise pollution, especially at night.</li><li>• Avoid proximity to landfill, contamination, industrial, and other polluting neighbours.</li><li>• Promote sites in proportion to the scale of the settlement, facilitating integration of new residents.</li></ul>		<ul style="list-style-type: none"><li>• Death rates</li><li>• Life expectancy</li><li>• Percentage of people with limiting long term illness</li><li>• Residents within 20 minutes travel time of different sports facilities</li><li>• Provision of, and access to, natural or semi-natural green space and green/blue infrastructure (Application of green space standards, as outlined in RDC CS Policy CO3 and RDC GI Study)</li><li>• IMD Score (Health &amp; Disability)</li><li>• IMD Score (Living Environment)</li><li>• Participants in local sport</li></ul>

3	SA Objective: Reduce crime and fear of crime	
SEA Directive topics: Human Health		
Decision-Aiding Questions		Indicators
<p>Does the option/policy:</p> <ul style="list-style-type: none"><li>• Reduce poverty and social exclusion in those areas most affected.</li><li>• Reduce the number of children living in poverty.</li><li>• Reduce the number of households in fuel poverty.</li><li>• Promote development with good proximity to facilities, services and schools.</li><li>• Promote effective integration with existing communities and external development.</li><li>• Provide for affordable housing.</li><li>• Provide for an appropriate housing mix.</li></ul>		<ul style="list-style-type: none"><li>• Recorded crime rates (by type) in Rother</li><li>• IMD score (crime)</li></ul>
4	SA Objective: Reduce deprivation and social exclusion	
SEA Directive topics: Population, Human Health		
Decision-Aiding Questions		Indicators
<p>Does the option/policy:</p> <ul style="list-style-type: none"><li>• Reduce poverty and social exclusion in those areas most affected</li><li>• Reduce the number of children living in poverty</li><li>• Reduce the number of households in fuel poverty</li><li>• Promote development with good proximity to facilities, services and schools.</li><li>• Promote effective integration with existing communities and external development.</li><li>• Provide for affordable housing.</li><li>• Provide for an appropriate housing mix.</li></ul>		<ul style="list-style-type: none"><li>• % households in fuel poverty</li><li>• % working population claiming benefits</li><li>• Indices of multiple deprivation</li><li>• % population in deprived areas</li><li>• Average gross annual earnings</li><li>• Households with an internet connection</li><li>• IMD Score (Income)</li></ul>
5	SA Objective: Raise educational achievement levels and develop the opportunities for lifelong learning	
SEA Directive topics: Population, Human Health		
Decision-Aiding Questions		Indicators
<p>Does the option/policy:</p> <ul style="list-style-type: none"><li>• Increase the numbers of school-leavers achieving GCSE passes</li><li>• Increase numbers undertaking further and higher education</li><li>• Enhance opportunities for adult education</li><li>• Have good accessibility to schools, colleges, universities, lifelong learning, and libraries</li></ul>		<ul style="list-style-type: none"><li>• Levels of educational attainment (achievements key stage 2 level 4 or above)</li><li>• Levels of educational attainment % attaining 5+ GCSEs</li><li>• IMD score (Education skills &amp; training).</li></ul>

6	<b>SA Objective:</b> Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	
<b>SEA Directive topics: Population, Human Health</b>		
<b>Decision-Aiding Questions</b>		<b>Indicators</b>
<p>Does the option/policy:</p> <ul style="list-style-type: none"><li>• Stimulate economic growth, particularly in priority regeneration areas</li><li>• Provide a diverse range of jobs that meets local needs</li><li>• Support the rural economy</li><li>• Ensure the correct mix of skills to meet the current and future needs of local employers</li><li>• Increase provision of better quality jobs / skilled employment</li><li>• Support increased employment in low impact sectors</li><li>• Provide on-site employment opportunities</li><li>• Develop with good access to existing and planned employment opportunities</li><li>• Support economically active, especially high skilled, residents to stay or move locally</li><li>• Promote a sustainable and buoyant tourism sector, including by fostering heritage based tourism/regeneration and or eco-tourism where appropriate (subject to requirements of Objective 14)</li><li>• Avoid negative impact upon economic, tourist or heritage assets</li><li>• Result in the loss of land to another use that is currently, previously or could potentially have been valuable employment/business uses.</li></ul>		<ul style="list-style-type: none"><li>• % unemployed for more than 1yr</li><li>• Unemployment as % of population</li><li>• GVA per person</li><li>• Business survival rates</li><li>• Local business units</li><li>• Number of VAT registered business</li><li>• Amount of land for employment</li><li>• Loss of employment land to retail</li><li>• Permissions for B class uses</li><li>• Tourism business turnover</li><li>• Tourism visitor numbers</li><li>• Broadband speeds</li><li>• IMD Score (Employment)</li></ul>
7	<b>SA Objective:</b> Improve accessibility to services and facilities for all ages across the District	
<b>SEA Directive topics: Population, Material Assets, Air, Climate Factors</b>		
<b>Decision-Aiding Questions</b>		<b>Indicators</b>
<p>Does the option/policy:</p> <ul style="list-style-type: none"><li>• Have good access to shops, services, educational and medical facilities, pubs, community hall, play areas, sports pitches, places of worship, library, nursery, petrol filling station.</li><li>• Have scope to facilitate the above via on or off-site provision.</li><li>• Improve accessibility, particularly in the rural areas of the District</li><li>• Support delivery of quality public transport</li><li>• Enhance the PRow and cycle network</li><li>• Support the timely delivery of infrastructure needs associated with new development</li><li>• Encourage the provision of services and facilities in accessible locations</li><li>• Help support the continued viability of services, particularly in rural areas</li></ul>		<ul style="list-style-type: none"><li>• Distance to key services</li><li>• % households within 30 minutes public transport of:<ul style="list-style-type: none"><li>- GP</li><li>- Hospital</li><li>- Primary &amp; secondary school</li><li>- Employment</li><li>- Major retail centre</li></ul></li><li>• % completed retail, office &amp; leisure development in centres</li></ul>

8	<b>SA Objective:</b> Encourage and facilitate increased engagement in cultural and leisure activities	
<b>SEA Directive topics: Human Health, Cultural Heritage</b>		
<b>Decision-Aiding Questions</b>		<b>Indicators</b>
Does the option/policy: <ul style="list-style-type: none"><li>• Improve accessibility to cultural and leisure activities</li><li>• Afford good access to community facilities, such as community hall, play areas, sports pitches, places of worship, library, theatres, cinemas, galleries, etc.</li><li>• Have scope to facilitate the above via on or off-site provision.</li><li>• Increase the number of cultural enterprises / organisations in the District.</li><li>• Result in the loss of land to another use that is currently, previously or could potentially have been valuable cultural and leisure uses.</li></ul>		<ul style="list-style-type: none"><li>• % of residents visiting museums</li><li>• Total leisure centres visits</li><li>• Visitors to De La Warr Pavilion</li><li>• Participants in local sport</li><li>• Access to natural and semi-natural green space</li><li>• Application of Open Space Standards</li></ul>
9	<b>SA Objective:</b> Improve efficiency in land use and encourage the prudent use of natural resources	
<b>SEA Directive topics: Material Assets, Air, Climatic Factors, Biodiversity, Soil</b>		
<b>Decision-Aiding Questions</b>		<b>Indicators</b>
Does the option/policy: <ul style="list-style-type: none"><li>• Use land in sustainable locations that has been previously developed in preference to greenfield sites</li><li>• Re-use buildings and materials</li><li>• Protect and enhance the best and most versatile agricultural land</li><li>• Maximise potential for providing facilities, i.e. from larger sites</li><li>• Apply suitable density standards to ensure the best use of developable land in appropriate locations</li><li>• Have potential to layout site to maximise energy efficiency (e.g. solar gain)</li><li>• Have availability of utility services on site (water, electricity, sewerage, etc)</li></ul>		<ul style="list-style-type: none"><li>• % additional homes on previously developed land</li><li>• Agricultural land classification</li></ul>
10	<b>SA Objective:</b> Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	
<b>SEA Directive topics: Material Assets, Air, Climatic Factors, Human Health, Biodiversity</b>		
<b>Decision-Aiding Questions</b>		<b>Indicators</b>
Does the option/policy: <ul style="list-style-type: none"><li>• Improve travel choice.</li><li>• Reduce the need for travel by car / lorry.</li><li>• Reduce the need to travel for commuting.</li><li>• Have access to public transport (buses, train services) and non-car modes to access services.</li><li>• Have access to pedestrian &amp; cycle routes for localised leisure opportunities.</li><li>• Have highway capacity.</li><li>• Avoid impact on and from AQMA.</li><li>• Improve air quality.</li><li>• Not worsen or, where practicable, mitigate traffic congestion</li></ul>		<ul style="list-style-type: none"><li>• Background levels of air pollutants</li><li>• Number of AQMAs</li><li>• Commuting patterns in/out District</li><li>• Mode of travel to work</li><li>• Licenced vehicles by vehicle type</li></ul>

11	<b>SA Objective:</b> Reduce emissions of Greenhouse gases	
<b>SEA Directive topics: Climatic Factors, Material Assets</b>		
<b>Decision-Aiding Questions</b>		<b>Indicators</b>
<p>Does the option/policy:</p> <ul style="list-style-type: none"><li>• Reduce emissions through reduced travel, energy consumption.</li><li>• Promote renewable energy generation.</li><li>• Promote community involvement, understanding &amp; action on climate change.</li><li>• Help reduce greenhouse gas emissions through reducing car travel.</li><li>• Have scope and potential to create or enhance walking and cycling routes, both on-site and off-site, to provide alternatives to car travel</li><li>• Promote reduced energy use in new development (waste management and reduce energy demand from non-renewable resources).</li><li>• Have potential for energy generation from renewable resources, including micro-generation as part of the energy requirements of new development.</li><li>• Have potential to maximise passive solar gain.</li><li>• Net Loss / Gain of Trees.</li></ul>		<ul style="list-style-type: none"><li>• Emissions of greenhouse gases</li><li>• Consumption of gas and electricity</li><li>• Traffic levels on key routes</li></ul>
12	<b>SA Objective:</b> Minimise the risk of flooding and resulting detriment to people and property	
<b>SEA Directive topics: Climatic Factors, Material Assets, Water, Human Health</b>		
<b>Decision-Aiding Questions</b>		<b>Indicators</b>
<p>Does the option/policy:</p> <ul style="list-style-type: none"><li>• Reduce the proportion of properties at risk of flooding in the District</li><li>• Avoid locations within flood zones, including EA Flood zones, EA defined areas of surface water risk and Local Surface Water Management Plans/SFRA identified issues of localised flooding.</li><li>• Ensure that appropriate flood risk protection measures are in place to protect well-being.</li><li>• Avoid exacerbating flood risk off-site by increasing run-off</li><li>• Provide scope for, and promotion /adoption of SuDS</li></ul>		<ul style="list-style-type: none"><li>• Properties at risk from flooding</li><li>• Planning permissions granted contrary to EA advice on flood defence grounds</li></ul>
13	<b>SA Objective:</b> Maintain, improve and manage water resources in a sustainable way	
<b>SEA Directive topics: Water, Human Health, Material Assets, Climatic Factors</b>		
<b>Decision-Aiding Questions</b>		<b>Indicators</b>
<p>Does the option/policy:</p> <ul style="list-style-type: none"><li>• Protect &amp; improve water quality (groundwater and surface water)</li><li>• Require the use of water efficiency measures</li><li>• Minimise the risk of pollution to water sources</li><li>• Avoid locations within groundwater source protection zones/aquifer.</li><li>• Avoid risk of pollution run-off into adjacent or nearby river network (including ordinary watercourses)</li><li>• For locations within the Pevensey Levels hydrological catchment: Recognise and appropriately respond to issues identified in the HRA, regarding both run-off and the promotion of water efficiency measures.</li><li>• Ensure new development has sufficient sewerage and waste water treatment capacity to avoid harm to water quality.</li><li>• Implement SuDS where appropriate to avoid run-off of polluted water to water courses or aquifers.</li><li>• Ensure any SuDS includes scope to enhance and enrich habitats and amenity value.</li></ul>		<ul style="list-style-type: none"><li>• Water consumption per household</li><li>• Quality of river water</li><li>• Rivers of High or Good chemical and biological water quality (passing Water Framework Directive criteria)</li><li>• Bathing quality at beaches</li></ul>

<b>14</b>	<b>SA Objective:</b> Conserve and enhance biodiversity and geodiversity
<b>SEA Directive topics: Water, Human Health, Material Assets, Climatic Factors</b>	
<b>Decision-Aiding Questions</b>	<b>Indicators</b>
<p>Does the option/policy:</p> <ul style="list-style-type: none"> <li>• Avoid harm to protected areas and designated sites (international, national, local), with protection appropriate to their status.</li> <li>• Address potential adverse impacts identified within the HRA process, (including potential adverse impacts from recreational pressure upon the integrity of the Dungeness complex of international sites; and upon water quality in the Pevensy Levels)</li> <li>• Provide green space, green or blue infrastructure which has added value via reducing pressure on international sites.</li> <li>• Protect and avoid harm to Habitats of Principle Importance.</li> <li>• Have scope to enhance and extend designated and locally valued habitats (including Habitats of Principle Importance) and species</li> <li>• Have scope to prevent and, where appropriate, reverse habitat fragmentation.</li> <li>• Ensure the location and design of sites does not cause the further fragmentation of habitats and protects and enhances network routes for flora and fauna movement (including corridor and stepping stone features such as hedges, ditches and ponds)</li> <li>• Have scope to establish or maintain a network of protected areas to maintain both the distribution and abundance of threatened species and habitats</li> <li>• Avoid harm to Ancient Woodland.</li> <li>• Acknowledge and protect important trees, particularly mature specimens and TPOs.</li> <li>• Acknowledge proximity to Biodiversity Opportunity Areas and scope to develop opportunities.</li> <li>• Avoid net loss of biodiversity.</li> <li>• Avoiding damaging impacts to geo-diversity.</li> <li>• Support landscaping that enhances native biodiversity</li> <li>• Have a positive nature conservation plan.</li> <li>• Have air quality impacts upon the natural environment by increasing traffic on roads (in particular within 200m of sensitive designated habitats).</li> </ul>	<ul style="list-style-type: none"> <li>• Number &amp; area designated sites</li> <li>• Condition of designated sites including SSSI in favourable, unfavourable recovering, unfavourable declining and unfavourable.</li> <li>• Number and area of Local Sites</li> <li>• Proportion of local sites that are in beneficial management.</li> <li>• Area (ha) of designated sites and reserves infringed by</li> <li>• Planning applications</li> <li>• % of designation / reserve in Rother infringed by planning applications</li> <li>• Area of ancient semi-natural Woodland</li> <li>• No further losses of ancient woodland from 2004 baseline</li> <li>• Area of Habitats of Principle Importance – gains or losses over time</li> <li>• Loss of hedgerows</li> <li>• Number of Tree Preservation Orders (TPOs) in place</li> <li>• Traffic levels on key routes within 200m of designated sites</li> </ul>

<b>15</b>	<b>SA Objective:</b> Protect and enhance the high quality natural and built environment
<b>SEA Directive topics: Landscape, Cultural Heritage, Soils</b>	
<b>Decision-Aiding Questions</b>	<b>Indicators</b>
<p>Does the option/policy:</p> <ul style="list-style-type: none"> <li>• Ensure protection and enhancement of the AONB and respect the key features and characteristics of the High Weald AONB and its setting.</li> <li>• Protect, enhance and avoid negative impacts upon sites &amp; features of historical, archaeological, or cultural interest (including conservation areas, listed buildings, registered parks and gardens and scheduled ancient monuments, registered battlefields, archeologically sensitive areas [ASAs])</li> <li>• Minimise adverse visual impact on landscape setting of towns and rural settlements</li> <li>• Respect the historical settlement context.</li> <li>• Promote development in character with the area</li> <li>• Seek to ensure that development is in keeping with the landscape character, including National and Local Landscape Character Areas.</li> <li>• Avoid negative impacts on coastal and marine environment including seascapes, protected marine areas and undeveloped coast.</li> <li>• Protect of gaps and avoid the coalescence of settlements.</li> <li>• Promote development that is in scale and proportionate to host settlement</li> <li>• Ensure building design, arrangement and materials used complement and add to character of area.</li> <li>• Promote sites that are well planned or soft landscaped in such a way as to positively enhance the environment.</li> <li>• Ensure that development is not at risk from land instability</li> </ul>	<ul style="list-style-type: none"> <li>• Number of Conservation Areas</li> <li>• Number of Listed Buildings</li> <li>• Number of Registered Parks and Gardens</li> <li>• Listed Buildings of Grade I and II* at risk</li> <li>• Scheduled Ancient Monuments at Risk</li> <li>• % of Listed Buildings at risk</li> <li>• % of SAMs at risk</li> <li>• % of Registered Parks and Gardens at risk</li> <li>• % of Conservation Areas at risk</li> <li>• % of Conservation Areas with an up-to-date character appraisal</li> <li>• Landscape character assessment</li> <li>• % of businesses within the High Weald that are land-based (in comparison to the wider south-east)</li> </ul>
<b>16</b>	<b>SA Objective:</b> Reduce waste generation and disposal, and achieve the sustainable management of waste
<b>SEA Directive topics: Material Assets</b>	
<b>Decision-Aiding Questions</b>	<b>Indicators</b>
<p>Does the option/policy:</p> <ul style="list-style-type: none"> <li>• Help reduce waste and facilitate recycling in construction and operation.</li> <li>• Encourage composting.</li> <li>• Encourage development self-sufficient in waste management.</li> <li>• Support recovery of energy from waste.</li> <li>• Have good proximity to a household waste facility.</li> <li>• Have good proximity to a 'bring' recycling point.</li> </ul>	<ul style="list-style-type: none"> <li>• Tonnage &amp; % of recycled household waste</li> <li>• Waste collected per person (kg)</li> <li>• % change in household waste collected per year</li> <li>• % household waste composted</li> <li>• % household waste landfilled</li> </ul>

## 4.2 Compatibility of SA Objectives

- 4.2.1 One of the difficulties encountered when undertaking sustainability appraisal is that objectives themselves may, to some extent at least, be inherently incompatible. Conflicts may exist between what objectives aim to achieve.
- 4.2.2 Table 4 shows the compatibility and potential conflicts between the Sustainability Objectives.
- 4.2.3 Highlighting these potential inconsistencies between different Sustainability Objectives allows the framework to try to balance these issues, or determine where the priorities should lie. Where possible, a mutually beneficial or compromise solution should be sought.
- 4.2.4 In addition to highlighted red crosses, a number of inter-relationships are marked ‘?’ to indicate uncertainty. Therefore, in such circumstances there is at least the possibility of incompatibility and these are also discussed alongside potential conflicts below.
- 4.2.5 The potential for conflicts in achieving development objectives and environmental objectives may arise particularly around the prioritisation of space and land to meet different objectives. The conflicts which the matrix highlights are as follows:

Objective 1: Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home.

- 4.2.6 A potential negative impact with ‘*9.Improve efficiency in land use and encourage the prudent use of natural resources*’ is highlighted.’ This is because the quantity of housing that the District needs to accommodate, combined with the relative lack of brownfield opportunities in sustainable locations, means that greenfield development is inevitable.
- 4.2.7 Residential development will inevitably result in more cars on the road, and hence a negative impact, in relation to ‘*10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage.*’
- 4.2.8 A potential negative impact with ‘*15.Protect and enhance the high quality natural and built environment*’ is also highlighted. This is because the District is 83% AONB along with numerous other environmental and heritage constraints. It seems likely that house-building will inevitably be a challenge to accommodate whilst avoiding harm to these assets. New residential development will to be directed, wherever possible, away from areas of high quality landscape character.

- 4.2.9 Compatibility with other SA objectives is questionable. In advance of a planning application, the exact layout of a site is difficult to confirm categorically in light of ‘3. *Reduce crime and fear of crime*’, although policy layout parameters do address such issues. Also in relation to objective 3, the nature of the rural area means it will simply not be possible to ensure all development is in close proximity of a police station.
- 4.2.10 Inevitably, residential development may be on land that is currently, was previously, or could potentially have been used for employment purposes (6. *Sustain economic growth and competitiveness and encourage innovation in higher value/lower impact activities*). Conversely, housing growth may in itself be a boost the economy, both directly to the construction industry, and indirectly by virtue of locating close to employment centres.
- 4.2.11 Given that new dwellings will not necessarily be zero carbon, as well as new housing resulting in more vehicle movements, there will inevitably be some negative impacts with ‘11. *Reduce emissions of Greenhouse gases*’. Negative impacts may be partially off-set by scope to provide renewable energy and an increase walking and cycling routes, particularly if located in sustainable locations.

Objective 6: Sustain economic growth and competitiveness and encourage innovation in higher value/lower impact activities.

- 4.2.12 Conflicts with the economic growth are largely similar to the conflicts with housing growth as identified in the previous section.

Table 4: Matrix of Compatibility of SA Framework Objectives

SA Framework Objectives	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	
1	N/a	(✓)	?	✓	(✓)	?	(✓)	(✓)	(✗)	(✗)	?	(✓)	~	~	(✗)	~	1
2	(✓)	N/a	(✓)	✓	(✓)	(✓)	✓	✓	(✓)	(✓)	✓	(✓)	(✓)	(✓)	(✓)	~	2
3	?	(✓)	N/a	✓	(✓)	(✓)	(✓)	(✓)	~	~	~	~	~	~	(✓)	~	3
4	✓	✓	✓	N/a	✓	✓	✓	✓	(✓)	✓	(✓)	~	~	~	~	~	4
5	(✓)	(✓)	(✓)	✓	N/a	✓	(✓)	(✓)	~	(✓)	(✓)	~	~	~	~	~	5
6	?	(✓)	(✓)	✓	✓	N/a	~	~	(✗)	(✗)	?	(✓)	~	~	(✗)	~	6
7	(✓)	✓	(✓)	✓	(✓)	~	N/a	✓	(✓)	✓	(✓)	~	~	~	(✓)	~	7
8	(✓)	✓	(✓)	✓	(✓)	~	✓	N/a	~	(✓)	(✓)	~	~	(✓)	✓	~	8
9	(✗)	(✓)	~	(✓)	~	(✗)	(✓)	~	N/a	~	✓	~	(✓)	(✓)	(✓)	(✓)	9
10	(✗)	(✓)	~	✓	(✓)	(✗)	✓	(✓)	~	N/a	✓	~	~	(✓)	(✓)	(✓)	10
11	?	✓	~	(✓)	(✓)	(✗)	(✓)	(✓)	✓	✓	N/a	~	~	(✓)	(✓)	✓	11
12	(✓)	(✓)	~	~	~	(✓)	~	~	~	~	~	N/a	✓	✓	(✓)	~	12
13	~	(✓)	~	~	~	~	~	~	(✓)	~	~	✓	N/a	✓	(✓)	~	13
14	~	(✓)	~	~	~	~	~	(✓)	(✓)	(✓)	(✓)	✓	✓	N/a	✓	~	14
15	(✗)	(✓)	(✓)	~	~	(✗)	(✓)	✓	(✓)	(✓)	(✓)	(✓)	(✓)	✓	N/a	(✓)	15
16	~	~	~	~	~	~	~	~	(✓)	(✓)	✓	~	~	~	(✓)	N/a	16

Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home.

Improve the health and well-being of the population and reduce inequalities in health.

Reduce crime and fear of crime.

Reduce deprivation and social exclusion.

Raise educational achievement levels and develop the opportunities for lifelong learning.

Sustain economic growth and competitiveness and encourage innovation in higher value/lower impact activities.

Improve accessibility to services and facilities for all ages across the District.

Encourage and facilitate increased engagement in cultural and leisure activities

Improve efficiency in land use and encourage the prudent use of natural resources

Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage.

Reduce emissions of Greenhouse gases.

Minimise the risk of flooding and resulting detriment to people and property.

Maintain, improve and manage water resources in a sustainable way.

Conserve and enhance biodiversity.

Protect and enhance the high quality natural and built environment.

Reduce waste generation and disposal, and achieve the sustainable management of waste.

### 4.3 Assessment Scoring

- 4.3.1 Sites, policies and options are assessed against the sixteen SA objectives, as set out in 'SA/SEA Scoping Report', which also contains 'decision-aiding questions' and indicators.
- 4.3.2 An overview of the degree to which a site meets the sustainability objectives is given in symbol form, as follows.

Table 5: Assessment Scoring – Symbols Explanation

Symbol	Explanation
✓	Potentially significant beneficial effect.
(✓)	Option supports the objective, or elements of the objective on balance, although effects may be minor.
~	Policy has no effect or is irrelevant, OR  Overall effect is neutral insofar as the benefits and drawbacks appear equal and neither is considered significant.
?	Uncertain or insufficient information on which to determine the assessment at this stage.
(✗)	Option appears to conflict with the objective on balance and may result in minor adverse effects.
✗	Potentially significant adverse effects.

### 4.4 Structure of the Sustainability Appraisal

- 4.4.1 The Proposed Submission DASA is split into two parts:
- Part A - Development policies. They consider a range of topics, essentially elaborating upon matters covered by the adopted Core Strategy. The scope of policies follows that of the Core Strategy, to help show the 'audit trail' of their genesis.
  - Part B - Site allocations. These are the site-specific policies setting out areas for development, notably housing, in the most part, but also include some area-based policies (e.g. town centre and district centre areas).
- 4.4.2 This SA responds to this structure, with Appendix 3 comprising the SA assessments of 'Development' Options and It updates, where appropriate, the SA of the Development Options contained within Appendix 3 of the SA of the DaSA Options and Preferred Options. Appendix 4 adopts a similar approach in relation to options and policies for sites.

## 4.5 The SA Development Options and Policies

### 4.5.1 The Proposed Submission DaSA includes policies relating to:

#### *Resource Management*

- Water Efficiency
- Renewable Energy Developments
- Energy Requirements

#### *Communities*

- Retention of Sites of Social or Economic Value
- Equestrian Developments

#### *Housing*

- Affordable Housing
- Rural Exception Sites
- Residential Internal Space Standards
- Accessible and Adaptable Homes
- Specialist Housing for Older People
- Self-build and Custom Housebuilding
- External Residential Areas
- Extensions to Residential Gardens
- Extensions, Alterations and Outbuildings
- Annexes
- Boundary Treatments
- Accesses and Drives

#### *Economy*

- Shopfronts, Signage and Advertising
- Holiday Sites
- Existing Employment Sites and Premises

#### *Environment*

- Maintaining Landscape Character
- The High Weald Area of Outstanding Natural Beauty (AONB)
- Strategic Gaps
- Biodiversity and Green Space
- Sustainable Drainage
- Land Stability
- Environmental Pollution

#### *Implementation*

- Comprehensive Development
- Development Boundaries

4.5.2 The majority of the Development Options previously subject to SA resulted in a “preferred option” which was taken forward as a draft policy in the ‘Options and Preferred Options’ DaSA and is now proposed as a policy in the Submission DaSA with no significant changes. While the final policy has been subject to further SA, in these cases there have been few changes in the SA scoring. The conclusions of the SA have been updated where necessary to reflect the progression of the policy.

- 4.5.3 In some instances, the Options and Preferred Options DaSA contained options for consultation, but no draft policy. An SA of the now drafted policy has been undertaken and the findings of these are summarised in the following section, as are those of earlier draft policies which have been subject to material changes:
- 4.5.4 The assessment of development policies in Appendix 3 and site allocations in Appendix 4 is similarly against all sustainability objectives. In addition, the site allocations are summarised in economic, social and environmental terms, before presentation of the overall SA conclusion. This reflects the more complex impact on the range of objectives.

## 4.6 The SA for Site Options and Policies

- 4.6.1 Appendix 4 of this SA comprises the SA assessments of *Sites* options and proposed policies. Site allocations form Part B of the DaSA.
- 4.6.2 Site allocations are put forward to meet the outstanding housing requirements of the adopted Local Plan Core Strategy, except for those within settlements (towns and villages) where Neighbourhood Plans are being prepared. An exception to this is Hurst Green<sup>5</sup>, for which options have already been considered in the Options and Preferred Options consultation version of the DaSA.
- 4.6.3 For reference, the residual Core Strategy housing requirements to be met from new sites are shown below.

Figure 2: Residual requirements to meet Core Strategy targets as at 1 April 2018

Area	Target	Completions (01/04/11 - 31/03/18)	Small site permission s (01/04/18)	Large site permissions (01/04/18)	Small site windfalls (01/04/23 - 31/03/28)	Residual req.
Bexhill	3,100	533	107	1,665	75	720
Battle	475	30	22	113	15	295
Rye	355	227	25	6	16	81
Hastings	100	59	1	26	1	13

- 4.6.4 The requirement from Rural Areas was divided between the respective villages, but with a separate small sites allowance for the whole Rural Areas. Figure 3 below indicates the residual housing requirements from larger sites (of 6+ dwellings) in the villages. Villages shown in bold italics are covered by this Local Plan, the others being covered by Neighbourhood Plans.

<sup>5</sup> Hurst Green Parish has latterly been designated as a Neighbourhood Area, but it is not considered possible for a Neighbourhood Plan to progress through the various stages to deliver the relevant Core Strategy development requirements before that plan is treated as out-to-date under the NPPF.

Figure 3: Residual requirements for individual villages as at 1 April 2018

Settlement	Core Strategy Large Site Requirement	Large Site Completions (04/13 - 03/18)	Large Site Permissions (01/04/18)	Residual requirements
<b>Beckley Four Oaks</b>	<b>26</b>	<b>6</b>	<b>0</b>	<b>20</b>
<b>Broad Oak</b>	<b>50</b>	<b>0</b>	<b>0</b>	<b>50</b>
Burwash	52	0	30	22
<b>Camber</b>	<b>40</b>	<b>20</b>	<b>0</b>	<b>20</b>
<b>Catsfield</b>	<b>53</b>	<b>0</b>	<b>15</b>	<b>38</b>
Crowhurst	20	0	0	20
Etchingham	51	21	10	20
<b>Fairlight Cove</b>	<b>37</b>	<b>0</b>	<b>16</b>	<b>21</b>
Flimwell	43	9	25	9
<b>Hurst Green</b>	<b>75</b>	<b>0</b>	<b>0</b>	<b>75</b>
<b>Iden</b>	<b>12</b>	<b>0</b>	<b>0</b>	<b>12</b>
Netherfield	48	0	25	23
<b>Northiam</b>	<b>123</b>	<b>65</b>	<b>58</b>	<b>6<sup>6</sup></b>
<b>Peasmarsh</b>	<b>50</b>	<b>0</b>	<b>11</b>	<b>39</b>
Robertsbridge	147	0	17	0 <sup>7</sup>
<b>Rye Harbour</b>	<b>40</b>	<b>0</b>	<b>0</b>	<b>40</b>
Sedlescombe	49	8	22	0 <sup>8</sup>
<b>Staplecross</b>	<b>25</b>	<b>0</b>	<b>26</b>	<b>0</b>
Ticehurst	87	21	70	0
<b>Westfield</b>	<b>89</b>	<b>0</b>	<b>39</b>	<b>50</b>
<b>Total (All villages)</b>	<b>1,117</b>	<b>150</b>	<b>251</b>	<b>465</b>

4.6.5 Reasonable options to meet these Core Strategy's housing targets have been subject to assessment. The sites themselves have been identified either as a result of an on-going call for sites or by Council officers, as set out in the SHLAA 2013 and the Sites Methodology Background Paper. The latter also explains the basis, drawing on the Core Strategy, for not considering some sites as reasonable options, on the basis that they are not well related to settlements for which the Core Strategy identifies a need to identify housing sites. This is subject to the qualification that brownfield sites well related to other villages with development boundaries are also considered as reasonable options worthy of further consideration, provided that the planning authority has been asked to consider them as part of this process. This reflects both national and local policies.

4.6.6 Notwithstanding the focus on meeting housing requirements, and appraising individual sites accordingly, there has also been a complementary review of all development boundaries. This includes consideration of whether a pre-existing (2006) Local Plan development boundary around a settlement is still appropriate having regard to its wider sustainability.

<sup>6</sup> This figure reflects the fact that a site with planning permission for 58 units is a specialised scheme which is not progressing. 52 units is regarded as a more reasonable estimate, leaving a balance of 6 dwellings.

<sup>7</sup> The residual requirement for Robertsbridge has been reduced to zero following the adoption of the Salehurst and Robertsbridge Neighbourhood Plan.

<sup>8</sup> The residual requirement for Sedlescombe has been reduced to zero following the adoption of the Sedlescombe Neighbourhood Plan.

- 4.6.7 Virtually all sites put forward through calls for sites have been for residential development, so are assessed as an option for that use. Particular forms of residential use, notably specialist/retirement housing have been considered where the landowner has specifically indicated this as an option and Council Planning Officers are of the view there is a planning merit in the suggestion.
- 4.6.8 Specific consideration is also given to potential Gypsy and Traveller sites. Alternatives are those sites in existing (or recent) temporary use for that purpose, suitable sites adjacent to existing permanent sites, other sites with an accepted willing landowner and the further strategic area for growth in Bexhill, to the north of the town.
- 4.6.9 The need for employment sites to meet outstanding Core Strategy minimum business floorspace requirements is set out in the Employment Sites Review Background Paper. That shows a quantitative need to identify sites in Bexhill, Hastings Fringes and Battle, with a need for additional sites in Rye/Rye Harbour to meet the higher target. For the Rural Areas, the minimum requirement appears likely to be met through windfall developments, but also identifies potential distributional and qualitative reasons for additional provision where suitable opportunities arise.
- 4.6.10 Initial consideration is given to whether previously allocated employment sites continue to represent sensible alternatives for business use to meet the identified requirements. This applies to sites at Bexhill, the Hastings Fringes, Rye Harbour and Marley Lane. Hence, each of these is subject to SA/SEA.
- 4.6.11 There are also some sites where other uses are also considered worthy of assessment. These are variously for retail use (specifically in Bexhill), or for some form of community use (e.g. allotments), where a need has been identified through relevant studies and endorsed by the local community.
- 4.6.12 As noted above, virtually all submitted sites are for residential development. However, an assessment has been made of other potential uses as well where the site represents a reasonable option for another purpose for which there is evidence of a local need, taking into account the wider plan objectives and the site specific context.
- 4.6.13 Where mixed or alternative uses are being considered for a site, the SA/SEA is undertaken for each of the main uses under consideration. In such cases, the assessment of separate uses is drawn together into a single final summary section entitled '*Site Commentary, Likely Significant Effects, Potential Mitigation and Conclusions*' where the relative merits of use options can be discussed.
- 4.6.14 The consultation on the Options & Preferred Options DaSA resulted in a number of representations concerning sites previously assessed together with the submission of a few additional sites. There were also some suggestions of combining sites and/ or amending the boundaries of sites previously assessed.

- 4.6.15 All new and amended sites have been subject to SA; their assessments are included in Appendix 4. All sites previously assessed have been re-appraised, having regard to representations received, and any amendments incorporated in the assessments in Appendix 4. The same is true of the Proposed Submission DaSA policies, which have now also been subject to an updated SA.
- 4.6.16 Site options assessments are organised by settlement, for ease of comparison. The SA of policies follows the relevant assessment of options.
- 4.6.17 Site options, including those which have been developed further into policies, have been assessed within the framework shown at Table 6 below.

Table 6: Method for assessing sites options

ALL SITE OPTIONS (FIRST SIEVE)		Sites						
		Site Name		Site Name		Site Name		
Site Size								
Proposed For / Main Use Considered		Residential	Employment	Residential	Community Use	Residential	Employment	Community Use
SA Objective		Score	Score	Score	Score	Score	Score	Score
1	Ensure that everyone has the opportunity to live in a decent sustainably constructed	✓						
2	Improve the health and well-being of the population and reduce inequalities in	(✓)						
3	Reduce crime and fear of crime.	~						
4	Reduce deprivation and social exclusion.	?						
5	Raise educational achievement levels and develop the opportunities for lifelong	(x)						
6	Sustain economic growth and competitiveness and encourage innovation	x						
7	Improve accssibility to services and facilities for all ages across the District.							
8	Encourage and facilitate increased engagement in cultural and leisure activities							
9	Improve efficiency in land use and encourage the prudent use of natural resources							
10	Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage.							
11	Reduce emissions of Greenhouse gases.							
12	Minimise the risk of flooding and resulting detriment to people and property.							
13	Maintain, improve and manage water resources in a sustainable way.							
14	Conserve and enhance biodiversity.							
15	Protect and enhance the high quality natural and built environment.							
16	Reduce waste generation and disposal, and achieve the sustainable management of waste.							
Site Commentary, Likely Significant Effects, Potential Mitigation and Conclusions								
Overall Settlement Commentary								

4.6.18 The two concluding rows are presented on the following basis:

Table 7: Explanation of Sites Options: Concluding Section

<b>Site Commentary, Likely Significant Effects, Potential Mitigation and Conclusions</b>	Completed per individual site. Commentary drawing on assessment to draw out likely significant effects, potential mitigation and overall conclusion.
<b>Overall Settlement Commentary</b>	Section completed on settlement basis, with text applying to all sites within the settlement. It draws out any SA factors that apply on a settlement wide basis.

- 4.6.19 Proposed Submission policies are further assessed Unlike the first Stage (SA of options), this second stage SA does not merely assess the site. It assesses the more detailed policy wording. As a consequence, the score can differ (generally the score improves) relative to the SA of site options. This more refined assessment elaborates on the commentary, drawing out economic, social and environmental factors.
- 4.6.20 In particular, regard to the policy wording allows for mitigation measures to be more clearly identified and for their effects to be more clearly and directly factored into the assessment process.
- 4.6.21 The final section ‘cumulative effects’ is applied on a settlement, rather than site, basis. Cumulative effects are logically considered at this stage since the overall quantum of development is more readily identifiable.
- 4.6.22 This assessment framework is shown at Table 8 below.

Table 8: Method for assessing Sites Policies

PREFERRED POLICIES (MAIN SIEVE)		Policies			
		Policy Number & Name		Policy Number & Name	
Site Size					
SA Objective		Score	Commentaries and Likely Significant Effects	Score	Commentaries and Likely Significant Effects
1	Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home.	✓	<u>Commentary on Economic Objectives (Primarily 1, 4, 5, 6, 9)</u>  xxxxxxx		<u>Commentary on Economic Objectives (Primarily 1, 4, 5, 6, 9)</u>  xxxxxxx
2	Improve the health and well-being of the population and reduce inequalities in health.	(✓)	<u>Commentary on Social Objectives (Primarily 1, 2, 3, 4, 5, 7, 8, 10)</u>		<u>Commentary on Social Objectives (Primarily 1, 2, 3, 4, 5, 7, 8, 10)</u>
3	Reduce crime and fear of crime.	~			
4	Reduce deprivation and social exclusion.	?	xxxxxxx		xxxxxxx
5	Raise educational achievement levels and develop the opportunities for lifelong learning.	(x)			
6	Sustain economic growth and competitiveness and encourage innovation in higher value/lower impact activities.	x	<u>Commentary on Environmental Objectives (Primarily 9, 10, 11, 12, 13, 14, 15, 16)</u>  xxxxxxxxx		<u>Commentary on Environmental Objectives (Primarily 9, 10, 11, 12, 13, 14, 15, 16)</u>  xxxxxxxxx
7	Improve accssibility to services and facilities for all ages across the District.				
8	Encourage and facilitate increased engagement in cultural and leisure activities		<u>Potential Mitigation</u>		<u>Potential Mitigation</u>
9	Improve efficiency in land use and encourage the prudent use of natural resources		Note potential for mitigation can influence scoring.		Note potential for mitigation can influence scoring.
10	Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage.		<u>SA Conclusions for Site</u>		<u>SA Conclusions for Site</u>
11	Reduce emissions of Greenhouse gases.		xxxxxxxxxxxxx		xxxxxxxxxxxxx
12	Minimise the risk of flooding and resulting detriment to people and property.				
13	Maintain, improve and manage water resources in a sustainable way.				
14	Conserve and enhance biodiversity.				
15	Protect and enhance the high quality natural and built environment.				
16	Reduce waste generation and disposal, and achieve the sustainable management of waste.				
Cumulative Effects					

## **5. APPRAISAL RESULTS AND OUTCOMES**

### **5.1 Introduction**

- 5.1.1 Each of the proposed Submission DaSA policies, as well as alternative options, has been assessed against the Sustainability Objectives in the SA Framework (see section 4.1).
- 5.1.2 This section provides an overview of the Sustainability Appraisal results, including summary tables and a summing up of mitigation measures, synergistic and cumulative effects. Detailed appraisal results are contained in Appendices 3 and 4, relating to generic 'development policies' and site allocations respectively.
- 5.1.3 Insofar as this SA relates to the final form of policies and all submitted reasonable options, it updates and effectively supersedes earlier DaSA SA reports.
- 5.1.4 Sites that were included within the Options and Preferred options document, but which have gained planning permission before April 2018 are no longer covered within the assessment.
- 5.1.5 As highlighted in section 4.2, there are some inevitable tensions between SA Objectives in terms of their compatibility. The purpose of the SA process is to identify the relative sustainability merits of different approaches for the plan. As such, where potential negative effects have been identified as a result of the appraisal, the SA process provides an opportunity for exploring measures for minimising these effects. It should be appreciated that negative effects do not necessarily indicate a failure of the Plan or its policies.

### **5.2 Development Policies**

- 5.2.1 Summaries of the proposed Submission DaSA policy assessments are set out, for each chapter, in tables 9-11 below:
  - Table 9: Resource Management; Community; Economy
  - Table 10: Housing
  - Table 11: Environment; Implementation
- 5.2.2 For the majority of development policy topics, the assessment of options and resulting 'preferred options' in the earlier 'Options and Preferred Options' DaSA are carried forward in the Submission DaSA with no significant changes. All final policies have been subject to a separate SA. The conclusions of the SA have been updated where necessary to reflect the progression of the policy. Unsurprisingly, in these cases, there have been few changes from the SA scoring of the "preferred option" to the SA scoring of the final policy.

5.2.3 It is highlighted that, for some policy areas, policies have been developed in this final iteration of the Plan from the options that were consulted upon but where no draft policy was previously identified. This relates to 'renewable energy', 'energy statements', 'affordable housing' and 'housing for older people' and 'custom and self-build housing'. A new policy, which is actually an amendment of a Core Strategy, has also been introduced, relating to 'rural exception sites'. In respect of both 'accessible and adaptable homes' and 'external residential areas', the policies have been materially amended following the earlier consultation. Assessments of the policies relating to these topics are summarised below.

5.2.4 Policy DRM2 – Renewable energy developments:

At Options and Preferred Options stage, the SA was carried out on two options for: site specific allocations for wind turbines; and a policy encouraging biomass/ wood fuel. In both cases, the options were to (a) include an allocation/ policy; or (b) include no policy. The SA for wind turbine allocations found the renewable energy benefits had to be weighed against potential landscape impacts. The SA for a biomass/ wood fuel policy found that while a new policy would provide scope for providing additional guidance, the existing Core Strategy policy SRM1 already provides support for the technologies. The chosen approach in the submission DaSA is, rather than 2 individual policies, an overarching renewable energy developments policy (DRM2) which gives in-principle support for low carbon and renewable energy schemes, while noting that proposals for large-scale stand-alone wind turbines schemes would not be supported. The SA for this policy found that, overall, it has positive environmental effects, particularly in respect of supporting a reduction in the use of fossil fuels which offers benefits in the prudent use of natural resources and reducing emissions of greenhouse gases. There may also be benefits in terms of reducing deprivation as increased uptake of renewable energy could help reduce fuel poverty. Support for appropriate biomass schemes offers benefits to woodland management and biodiversity, while a restriction on large-scale wind turbines offers protection to the landscape.

5.2.5 Policy DRM3 – Energy requirements:

At Options and Preferred Options stage, two options were subject to SA: (a) to retain a low threshold for the submission of an Energy Statement as per Core Strategy Policy SRM1 (i) (i.e. to require it from smaller developments of 10 or more dwellings/1000 sqm non-residential floorspace); or (b) to set a higher threshold of more than 50 dwellings/ 5,000sqm floorspace. The SA found there were strengths and weaknesses in both approaches around the themes of increasing uptake of renewable energy technologies, but potentially affecting the viability/ deliverability of schemes. The submission DaSA takes forward a policy (DRM3) which effectively supersedes Core Strategy Policy SRM1(i) by removing the requirement for an Energy Statement, but, instead, requiring developments of more than 100 dwellings/10,000sqm business floorspace to demonstrate that due regard has been had to energy efficiencies, including through the use of renewable/ low carbon technologies; also noting that the incorporation of renewable and

low-carbon energies can be a factor weighing in favour of a development. The SA for this policy found that it has positive environmental effects, particularly in respect of supporting improved energy efficiency of buildings, thereby contributing to sustainable construction and a reduction in fuel poverty. It also supports a reduction in the use of fossil fuels and the emissions associated with burning them. It will not lead to any significant increased economic burden on developers over and above the Building Regulations.

**5.2.6 Policy DHG1 – Affordable housing:**

The policy options assessed were: (a) retain existing Core Strategy thresholds for affordable housing; (b) adopt thresholds in line with the PPG and not seek financial contributions on smaller schemes in the AONB; and (c) adopt thresholds in line with the PPG and seek financial contributions. The SA found that option A was most supportive of meeting housing needs, with some positive impacts on deprivation and social exclusion, followed by option C. Instead of taking forward one of the options directly, the submission DaSA policy (DHG1) reflects the thresholds of the new NPPF, which virtually align with the Core Strategy approach (Option A) but does not require provision from small schemes outside the AONB. The SA for the policy found that it has positive social effects, particularly in terms of ensuring everyone has the opportunity to live in an affordable home, and reducing deprivation and social exclusion. The policy takes account of viability and should lead to no negative impact on schemes' delivery or economic growth.

**5.2.7 Policy DHG2 - Rural exception sites:**

The existing Core Strategy policy for Exception Sites was assessed alongside a variation that introduces the potential for enabling market housing. These were options A and B respectively. The SA found that the introduction of the amendment would have some benefit over the existing policy in terms of increasing opportunities to live in an affordable home (Objective 1). In other respects the options are similarly assessed. Criteria are included in the policy itself to mitigate the assessed potential negative impact on protecting the high quality environment (Objective 15).

**5.2.8 Policy DHG4 - Accessible and adaptable homes:**

There were 4 policy options subject to SA: (a) require all homes to be built to the enhanced access standard (M4(2)); (b) require 25% of homes on sites of 11+ dwellings to be built to the enhanced standard; (c) require 25% of homes to be built to the M4(2) standard on sites of 11+ dwellings and an additional 5% to be built to wheelchair adaptable standard (M43(a)) on sites of 50 + dwellings; and (d) include no policy. The SA found that option C offered the greatest overall benefits and this was taken forward as a preferred option. However, having regard to the PPG, available evidence suggests that the introduction of M4(2) standard is justified in the District due to its ageing population and forecasted increase in the number of people with mobility issues and limiting illnesses. Therefore, the policy taken forward in the submission DaSA follows option A (all dwellings are required to meet M4(2) standard) but with an additional requirement that where there is an

identified need, 5% of affordable housing should be built to M4(3) standard. The policy also notes that only in circumstances where it can be robustly demonstrated that it is not practicable or financially viable to deliver the provisions will new development be exempt from the requirements. The SA for the policy found it has positive social effects in terms of meeting the needs of a range of occupiers and increasing housing choice for those with, or likely to develop, mobility impairments, thereby benefiting health and well-being and helping to reduce social exclusion. While viability and the effect on the cost of new housing have been considered, evidence has found that the policy requirements, together with other policy requirements of the Plan, should not prejudice the viability of sites.

**5.2.9 Policy DHG5 – Specialist housing for older people:**

There were 6 policy options assessed: (a) require schemes over 100 dwellings to provide some housing for older people; (b) set district-wide targets for types of care home places; (c) promote extra care housing schemes in rural service centres; (d) seek housing for older people as part of affordable housing; (e) seek housing for older people as part of market housing; and (f) promote a “care hotel” to assist transition from hospital back to independent living. The SA found that all options were worthy of further consideration as none had negative impacts. The policy taken forward (DHG5) supports schemes to meet the needs set out in the East Sussex Bedded Care Strategy in the larger towns and villages, noting that regard should be had to the needs of older people in the siting of housing in terms of access to services and public transport. Further requirements are not included, as all dwellings will now be required to include enhanced access standards in accordance with Policy DHG4 in any event. The SA of the policy found it has positive social effects, particularly in respect of facilitating an increase in the provision of specialist housing for older people in sustainable locations which have a range of services, scoring well in respect of objectives 1, 2, 4, 7, 8, and 10.

**5.2.10 Policy DHG6 – Self-build and custom housing:**

Four policy options were assessed, which are not mutually exclusive: (a) a policy that generally encourages self and custom build housing on residential sites; (b) a policy that requires a proportion of such housing in strategic allocations; (c) a policy that requires a proportion of such housing in large residential sites (50+ dwellings); and (d) a policy that allocates specific sites for such housing. The SA found that each of the options had merits but high levels of uncertainty. The policy taken forward (DHG6) is along the lines of option C but with a lower threshold, i.e. sites of 20 or more dwellings will be required to provide for 5 – 10% self and custom house-building. It also gives in principle support for self and custom house-building projects. This reflects evidence suggesting that self and custom-build could account for some 10% of total housing although only a proportion of people on the Register are interested in plots being set aside as part of a larger site. The SA of the policy has found that it has social benefits in terms of facilitating an increase in the range of available homes, which could potentially include cheaper and more sustainable homes. It is likely to assist the viability of schemes. Setting

the threshold at schemes of 20 dwellings or more increases the likelihood of such plots being in sustainable locations with good access to services.

5.2.11 Policy DHG7 – External residential areas:

There were 3 policy options subject to SA: (a) no policy; (b) a general policy highlighting the need to consider amenity space, parking and refuse/recycling; and (c) a detailed policy setting standards for these matters, Option C was found to have several sustainability advantages over the other two options and this was taken forward. The submission DaSA retains a detailed policy in accordance with option A but, in relation to private external space, the previous policy included a requirement for dwellings with three or more bedrooms to have a rear garden at least 10 metres long, whereas the new policy applies this requirement to all dwellings (other than flats). To a large extent, this is already being applied by developers. Another additional requirement of the new policy is for cycle storage in addition to car parking. The SA of the new policy has found it has positive sustainability effects in terms of supporting well-designed residential development with adequate garden space and that the requirement for cycle parking provision should help promote sustainable travel.

5.2.12 There are two other policies where the final policy involves a merging of two earlier policy options and where the updated SA reflects a review process:

a) Policy DCO2 – Equestrian developments. As well as the principal benefit in terms of objective 15 (protect and enhance the natural environment), the new policy which supports such development providing they meet the listed criteria, is regarded as also having minor positive effects in terms of health and well-being; supporting the rural economy; and increasing engagement in leisure activity.

b) Policy DEC2 – Holiday sites. The new policy has been assessed as having positive environmental effects overall, particularly in respect of supporting the economy and facilitating appropriate tourism development; making best use of land and natural resources by taking a relatively restrictive approach, preventing inappropriate development in areas of flood risk and conserving biodiversity (including in the SARMS area) and landscape character. While it may lead to some increase in car usage in the countryside due to the dispersal of sites, it is not supportive of large scale proposals thus reducing the potential for negative impacts.

5.2.13 In terms of the SA results and outcomes for other policies:

- the SA supports adoption of the higher, 'optional', standard for water efficiency
- a policy for the retention of sites of social or economic value is supported, notably in terms of health and wellbeing, reducing social exclusion, economic growth and engagement in culture and leisure
- the adoption of internal space standards are supported, bringing a greater benefit in terms of access to decent housing

- the existing policy approach to proposals for extensions to residential gardens is supported where balanced by a clear criterion protecting landscape and other amenities
- an elaboration of the previous policy is supported, notably with specific regard to annexes, where a “sequential approach” to the form they take is favoured
- new policies for boundary treatments, accesses and drives are favoured, primarily to give greater protection for and enhancement of the built and natural environment
- a more detailed shopfronts, signage and advertising policy is found to provide somewhat greater benefit in terms of the built and natural environment
- the continued policy protection for existing employment sites and premises is favoured on balance, notably because of the significance of the economic benefits locally
- policies that provide some local specificity in relation to landscape conservation generally and for the High Weald AONB in particular are clearly favoured
- the options assessment in relation to Strategic Gaps, which compared the existing boundaries and those recommended by a independent review, supported the proposed amendments, albeit with marginal differences in terms of overall sustainability. This reflects the fact that the premise of the options is essentially the same, as seen by the policy SA
- a more proactive policy for biodiversity and green space is clearly supported over a wide range of sustainability objectives, with the policy itself also supporting sustainable water resource management
- a locally-specific policy for sustainable drainage also offers benefits to a wide range of sustainability objectives, with the policy highlight that they are multi-functional also offering some health and well-being benefit
- there are advantage across several sustainability objectives of having a local policy for land stability, with further detail in relation to Fairlight. (NB The drainage element of the option relating to surface water in the Fairlight/Pett Level area is now incorporated into the Sustainable Drainage policy)
- the consolidation and elaboration of the policy approach to different forms of environmental pollution, including light pollution is positive against a number of sustainability objectives
- the sustainability benefits of the elaborated policy to ensure a comprehensive approach to the development of land are wide-ranging
- the continued use of ‘development boundaries’ as a policy tool is found to be generally positive across the sustainability objectives

- 5.2.14 Overall, the development policies are found to have a wide range of sustainability benefits across a number of objectives. Inevitably, there are a few negative impacts, but these are all minor and tend to reflect the different emphases of single topic policies, notably between environmental conservation and development-oriented policies

Table 9: Summary Appraisal of Development Policies (Resources, Community, Economy)

DEVELOPMENT POLICIES				Resource Management		Communities		Economy		
Sustainability Appraisal Objective		Policy DRM1: Water Efficiency	Policy DRM2: Renewable Energy Developments	Policy DRM3: Energy Requirements		Policy DCO1: Retention of sites of social or economic value	Policy DCO2: Equestrian Developments	Policy DEC1: Shopfronts and Advertising	Policy DEC2: Holiday Sites	Policy DEC3: Existing Employment Sites
1	Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home.	(✓)	~	(✓)		~	~	~	~	~
2	Improve the health and well-being of the population and reduce inequalities in health.	~	~	~		(✓)	(✓)	~	~	~
3	Reduce crime and fear of crime.	~	~	~		~	~	~	~	~
4	Reduce deprivation and social exclusion.	~	(✓)	(✓)		(✓)	~	~	~	(✓)
5	Raise educational achievement levels and develop the opportunities for lifelong learning.	~	~	~		~	~	~	~	~
6	Sustain economic growth and competitiveness and encourage innovation in higher value/lower impact activities.	~	~	~		(✓)	(✓)	~	(✓)	✓
7	Improve accessibility to services and facilities for all ages across the District.	~	~	~		?	~	~	~	~
8	Encourage and facilitate increased engagement in cultural and leisure activities	~	~	~		(✓)	(✓)	~	(✓)	~
9	Improve efficiency in land use and encourage the prudent use of natural resources	~	(✓)	(✓)		~	(✓)	~	~	(✓)
10	Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage.	~	~	~		~	?	~	(x)	~
11	Reduce emissions of Greenhouse gases.	~	(✓)	(✓)		~	~	~	~	~
12	Minimise the risk of flooding and resulting detriment to people and property.	~	~	~		~	~	~	(✓)	~
13	Maintain, improve and manage water resources in a sustainable way.	✓	~	~		~	~	~	~	~
14	Conserve and enhance biodiversity.	(✓)	(✓)	~		~	~	~	(✓)	~
15	Protect and enhance the high quality natural and built environment.	~	(✓)	~		?	(✓)	✓	(✓)	(✓)
16	Reduce waste generation and disposal, and achieve the sustainable management of waste.	~	~	~		~	~	~	~	~

Assessment Scoring – Symbols Explanation

Symbol	Explanation
✓	Potentially significant beneficial effect.
(✓)	Option supports the objective, or elements of the objective on balance, although effects may be minor.
~	Policy has no effect or is irrelevant, <b>OR</b> Overall effect is neutral insofar as the benefits and drawbacks appear equal and neither is considered significant.
?	Uncertain or insufficient information on which to determine the assessment at this stage.
(x)	Option appears to conflict with the objective on balance and may result in minor adverse effects.
x	Potentially significant adverse effects.

Table 10: Summary Appraisal of Development Policies (Housing)

DEVELOPMENT POLICIES		Housing											
Sustainability Appraisal Objective		Policy DHG1: Affordable Housing	Policy DHG2: Rural Exception Sites	Policy DHG3: Residential Internal Space Standards	Policy DHG4: Accessible and Adaptable Homes	Policy DHG5: Specialist Housing for Older People	Policy DHG6: Self- build and Custom Housing	Policy DHG7: External Residential Areas	Policy DHG8: Extensions to Residential Gardens	Policy DHG9: Extensions, Alterations and Outbuildings	Policy DHG10: Annexes	Policy DHG11: Boundary Treatments	Policy DHG12: Accesses and Drives
1	Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home.	✓	✓	✓	✓	✓	✓	✓	(✓)	(✓)	(✓)	~	~
2	Improve the health and well-being of the population and reduce inequalities in health.	~	(✓)	~	(✓)	(✓)	~	(✓)	~	?	(✓)	~	~
3	Reduce crime and fear of crime.	~	~	~	~	~	~	~	~	~	~	~	~
4	Reduce deprivation and social exclusion.	(✓)	✓	~	(✓)	(✓)	?	~	~	~	(✓)	~	~
5	Raise educational achievement levels and develop the opportunities for lifelong learning.	~	~	~	~	~	~	~	~	~	~	~	~
6	Sustain economic growth and competitiveness and encourage innovation in higher value/lower impact activities.	~	~	~	~	~	(✓)	~	~	~	~	~	~
7	Improve accessibility to services and facilities for all ages across the District.	~	~	~	~	(✓)	(✓)	~	~	~	~	~	~
8	Encourage and facilitate increased engagement in cultural and leisure activities	~	~	~	~	(✓)	(✓)	~	~	~	~	~	~
9	Improve efficiency in land use and encourage the prudent use of natural resources	~	~	~	~	~	~	~	~	(✓)	(✓)	~	~
10	Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage.	~	~	~	~	(✓)	~	(✓)	~	~	?	(✓)	(✓)
11	Reduce emissions of Greenhouse gases.	~	~	~	~	~	~	~	~	~	~	~	~
12	Minimise the risk of flooding and resulting detriment to people and property.	~	~	~	~	~	~	~	~	~	~	~	~
13	Maintain, improve and manage water resources in a sustainable way.	~	~	~	~	~	~	~	~	~	~	~	~
14	Conserve and enhance biodiversity.	~	~	~	~	~	~	~	?	~	~	~	~
15	Protect and enhance the high quality natural and built environment.	~	(x)	~	~	~	~	(✓)	(✓)	(✓)	(✓)	✓	(✓)
16	Reduce waste generation and disposal, and achieve the sustainable management of waste.	~	~	~	~	~	~	(✓)	~	~	~	~	~

Assessment Scoring – Symbols Explanation

Symbol	Explanation
✓	Potentially significant beneficial effect.
(✓)	Option supports the objective, or elements of the objective on balance, although effects may be minor.
~	Policy has no effect or is irrelevant, <b>OR</b> Overall effect is neutral insofar as the benefits and drawbacks appear equal and neither is considered significant.
?	Uncertain or insufficient information on which to determine the assessment at this stage.
(x)	Option appears to conflict with the objective on balance and may result in minor adverse effects.
x	Potentially significant adverse effects.

Table 11: Summary Appraisal of Development Policies (Environment, Implementation)

DEVELOPMENT POLICIES		Environment							Implementation	
Sustainability Appraisal Objective		Policy DEN1: Maintaining Landscape Character	Policy DEN2: The High Weald AONB	Policy DEN3: Strategic Gaps	Policy DEN4: Biodiversity and Green Space	Policy DEN5: Sustainable Drainage	Policy DEN6: Land Stability	Policy DEN7: Environmental Pollution	Policy DIM1: Comprehensive Development	Policy DIM2: Dev Boundaries
1	Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home.	~	~	(x)	(x)	~	(✓)	~	(✓)	(✓)
2	Improve the health and well-being of the population and reduce inequalities in health.	~	~	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)	~
3	Reduce crime and fear of crime.	~	~	~	~	~	~	~	~	~
4	Reduce deprivation and social exclusion.	~	~	~	~	~	~	~	(✓)	?
5	Raise educational achievement levels and develop the opportunities for lifelong learning.	~	~	~	~	~	~	~	~	~
6	Sustain economic growth and competitiveness and encourage innovation in higher value/lower impact activities.	~	~	(x)	?	~	?	~	(✓)	(x)
7	Improve accessibility to services and facilities for all ages across the District.	~	~	~	(✓)	~	~	~	(✓)	(✓)
8	Encourage and facilitate increased engagement in cultural and leisure activities	~	~	~	(✓)	(✓)	~	~	(✓)	~
9	Improve efficiency in land use and encourage the prudent use of natural resources	?	?	(✓)	?	?	(✓)	~	~	(✓)
10	Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage.	~	~	~	~	~	~	(✓)	~	(✓)
11	Reduce emissions of Greenhouse gases.	~	~	~	~	~	~	~	~	~
12	Minimise the risk of flooding and resulting detriment to people and property.	~	~	~	(✓)	✓	(✓)	~	(✓)	~
13	Maintain, improve and manage water resources in a sustainable way.	(✓)	(✓)	~	(✓)	✓	~	~	~	~
14	Conserve and enhance biodiversity.	(✓)	(✓)	(✓)	✓	✓	~	(✓)	(✓)	~
15	Protect and enhance the high quality natural and built environment.	✓	✓	✓	✓	(✓)	(✓)	✓	(✓)	(✓)
16	Reduce waste generation and disposal, and achieve the sustainable management of waste.	~	~	~	~	~	~	~	~	~

Assessment Scoring – Symbols Explanation

Symbol	Explanation
✓	Potentially significant beneficial effect.
(✓)	Option supports the objective, or elements of the objective on balance, although effects may be minor.
~	Policy has no effect or is irrelevant, <b>OR</b> Overall effect is neutral insofar as the benefits and drawbacks appear equal and neither is considered significant.
?	Uncertain or insufficient information on which to determine the assessment at this stage.
(x)	Option appears to conflict with the objective on balance and may result in minor adverse effects.
x	Potentially significant adverse effects.

## 5.3 Site Allocations

5.3.1 Summaries of the assessments of site options and proposed policies are set out in tables 12-14 below, by settlement. Villages are presented in alphabetical order.

- Table 12: Bexhill; Hastings Fringes
- Table 13: Villages
- Table 14: Other spatial policies

5.3.2 The full assessments are contained in Appendix 4.

5.3.3 For each settlement where the Core Strategy makes provision for housing growth from new sites, Appendix 4 is laid out as follows:

- a) a plan showing the locations of the options assessed
- b) an SA of each of the options
- c) an SA of the policies in that settlement

5.3.4 For other settlements which have a development boundary, there are sustainability appraisals of the appropriateness of retaining (including amendments) of their 'development boundary' or removing it (which would mean that countryside policies would apply in that area).

5.3.5 The appraisals of options and policies for Gypsy and Traveller sites are in the final section in Appendix 4, as is the employment allocation<sup>9</sup> on Marley Lane.

5.3.6 It should be noted that options that have received planning permission since the publication of the SA of the 'Options and Preferred Options' DaSA are no longer included in this SA, as they are treated as commitments in the DaSA.

5.3.7 Overall, the policies for the site allocations are found to have a wide range of sustainability benefits across a number of objectives. Inevitably, there are a few negative impacts, but these are all minor. Furthermore, they tend to reflect the tensions in making choices between different uses. In all cases, the balance of advantage of the proposal can be clearly seen by the far greater beneficial effects, both minor and significant.

### Bexhill

5.3.8 One site, BX120 – Barnhorn Green, included in the Options & Preferred Options DaSA is no longer included as it now has planning permission. A small number of other sites were submitted for consideration, the majority of which are already part of other sites which have been previously assessed.

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<sup>9</sup> An employment use is considered to be the only reasonable option.

- 5.3.9 The only site where the DaSA Options and Preferred Options document did not indicate a preference was the former UAE Training Camp at Northeye, to the west of the town. Four options were presented, based on the existing brownfield part of the site comprising of employment or housing, or tourism use or institutional use. Common to all options was that the greenfield part of the site should remain open and either brought forward as playing pitches or returned to agriculture. All options scored relatively comparably against the sustainability objectives. However, given there has been limited commercial interest for employment, tourism or institutional use of the site, housing is put forward as the most appropriate option for the brownfield part of the site.

#### *North Bexhill*

- 5.3.10 This generally relates to the swathe of land between the existing built-up area and the new North Bexhill Access Road, from Preston Hall Farm in the east to the A269, Ninfield Road in the west. The DaSA Options and Preferred Options set out the preferred option for North Bexhill (option 1 – up to 450 dwellings and associated infrastructure), with two further options presented but not favoured. The Council has since refined the options and developed two further options (resulting in five options being considered):

1. up to 420 dwellings and supporting infrastructure
2. up to 480 dwellings, 6,500 business floorspace and supporting infrastructure
3. up to 630 dwellings, 6,500 business floorspace and supporting infrastructure
4. up to 530 dwellings and supporting infrastructure
5. up to 605 dwellings and supporting infrastructure

- 5.3.11 The Submission DaSA SA considers each of these options. In particular, options with built development to the north of NBAR and west of the A269 perform negatively against objective 15 due to landscape impacts.

- 5.3.12 Following the SA process, the North Bexhill allocation is now presented as three site specific policies - BEX3a, BEX3b and BEX3c - supported by a strategic infrastructure delivery policy, BEX3. This approach generally reflects the pattern of land ownership and the site-specific requirements, such as in terms of highway access. This approach does not result in any specific negative impact in SA terms, particularly as there is an overarching policy which specifically determines the approach to the delivery of strategic infrastructure for North Bexhill.

#### *Other residential sites*

- 5.3.13 All reasonable options have been considered in terms of their suitability for residential development against sustainability objectives. The proposed allocations are for those sites that perform best overall. In many cases, mitigation measures are incorporated into policies to address potential negative or uncertain impacts.

### *Business sites*

- 5.3.14 One purely business site is identified to meet the outstanding requirement (in addition to existing commitments) for business floorspace growth. This strategic site at North Bexhill provides opportunities for a broad mix of office, light manufacturing and other industrial/storage uses. Subject to the inclusion of a number of environmental and access safeguards, this proposal scores very well in sustainability terms.

### *Gypsies and Travellers*

- 5.3.15 The DaSA Options and Preferred Options set out within the preferred option policy for North Bexhill the provision of a Gypsies and Traveller site for 5 pitches to contribute towards meeting the outstanding identified need through the Core Strategy, with a site suggested at the eastern end of the development east of Watermill Lane. Further options have now been considered by looking at areas within each of the North Bexhill development areas (Kiteye Farm and adjoining land, Land west of Watermill Lane and Land west of Watermill Lane), with a further option at the end of the southern section of Watermill Lane, to the rear of Preston Cottage. All options perform comparably in SA terms, with Land rear of Preston Cottage performing more positively in terms of SA objective 15.

### *Town Centre and related policies*

- 5.3.16 The Core Strategy includes a specific town centre strategy. Options have been assessed for meeting its broad provisions in a sustainable way. Separate definitions of the 'Town Centre' and the 'Primary Shopping Area' are favoured.
- 5.3.17 The DaSA Options and Preferred Options highlighted 'Land south-east of Beeching Road as the preferred option for further convenience retail floorspace growth in Bexhill. Amendments have been considered as a result of further studies and feedback. These have resulted in a modified policy, although the changes have not resulted in particular impacts on scoring against sustainability objectives.
- 5.3.18 The DaSA Options and Preferred Options also highlighted that the London Road to Sackville Road corridor would benefit from positive plans for enhancement. The consultation sought to determine views as to whether this area should be targeted for enhancement and exactly what the priorities for this area should be. A number of priorities were identified including public realm enhancements, pedestrian and vehicular movement and parking - these are set out as the basis for Policy BEX16. The SA now identifies positive effects on the SA objectives of this policy, including a major positive impact on objective 15.
- 5.3.19 A minor amendment has been made to boundary of the Bexhill Cultural Area that was appraised in the earlier SA iteration, but this has not resulted in particular impact on the scoring against sustainability objectives.

## Hastings Fringes

- 5.3.20 One site included in the Options & Preferred Options DaSA is not included (HF18a) as it has since received planning permission. No other alternative sites were submitted as part of the consultation. The Countryside Park policy (HAS1) produces wide-ranging positive sustainability benefits, as does, on a smaller scale, the Rock Lane Urban Fringe Management Area (HAS4).

## Villages

- 5.3.21 The re-appraisal of sites previously considered in the Options and Preferred Options SA has not resulted in any significant changes to the scoring in respect of any of the village sites. In cases where the policies are little changed from the policies put forward at Options and Preferred Options stage, the new SA scores largely reflect those of the original policies. In other cases, where amended sites and/or policies are considered, the SA scoring updated as appropriate.
- 5.3.22 Policies where sites have significantly changed include:
- BEC2 (Land south of Buddens Green, Beckley), where the size of the site has reduced and an amenity area omitted)
  - BRO2 (Land at the Rainbow Trout, Broad Oak), where the size of the site and number of dwellings have increased and the policy now includes retention of a public house
  - WES4 (Land connecting Moor Lane and the A28, Westfield), which is now proposed as allotments rather than a green corridor/ pedestrian and cycle link)
  - CAM2 (Land at Central Car Park, Camber), where residential use is no longer proposed for flood risk reasons but tourism and public realm uses are put forward.

The effects of these changes on SA objectives are variable but there are no significant adverse effects on sustainability, and in some cases, additional positive effects.

- 5.3.23 Fairlight Cove is now included in the DaSA following abandonment of a neighbourhood plan for the area. Hence, site options are now assessed in this SA (drawing on those previously assessed either through the SHLAA process and during preparation of the Fairlight Neighbourhood Plan) and new policies put forward:
- FAC1 (Former Market Garden, Fairlight Cove)
  - FAC2 (Land east of Waites Lane, Fairlight Cove)
- 5.3.24 A further new policy is proposed in Northiam - NOR2 (Land at Goddens Gill/ The Paddock, Northiam), where the implementation of an existing permission is highly unlikely.

- 5.3.25 All the new allocations have been subject to SA and have scored generally positively against SA objectives.
- 5.3.26 One village site has been removed from the SA. Site CA6 (Land at Skinners Lane, Catsfield) was a preferred option, but now has planning permission, so is not considered further through the DaSA.
- 5.3.27 Two sites put forward as a result of the consultation on the Options & Preferred Options DaSA, are not included in the SA. Site FO18 (Beckley Motors) has since received planning permission, while SW2 (Orchard Farm, A21) is not within a settlement and therefore, not a reasonable alternative.



Table 12: Summary Appraisal of Sites and Spatial Policies (Bexhill and Hastings Fringes)

Sustainability Appraisal Objective	Policy BEX1: Land at Levett's Wood and Oaktree Farm, Sidley	Policy BEX2: Land at Preston Hall Farm, Sidley	Policy BEX3: Land at North Bexhill - Infrastructure	Policy BEX3a: Kiteye Farm and adjoining land	Policy BEX3b: Land west of Watermill Lane	Policy BEX3c: Land east of Watermill Lane	Policy BEX4: Land at Former High School Site and Drills Hall, Down Road, Bexhill	Policy BEX5: Land at Gullivers Bowls Club, Knole Road, Bexhill	Policy BEX6: Land adjacent to Cemetery Lodge /276 Turkey Road, Bexhill	Policy BEX7: Land at Moleynes Mead, Fryatts Way, Bexhill	Policy BEX8: Land South of Terminus Road, Bexhill	Policy BEX9: Land off Spindlewood Drive, Bexhill	Policy BEX10: Land at Northeye (Former UAE Technical Training Project), Bexhill
1 Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home.	~	✓	~	✓	✓	✓	(✓)	(✓)	(✓)	(✓)	(✓)	✓	(✓)
2 Improve the health and well-being of the population and reduce inequalities in health.	✓	(✓)	✓	✓	✓	✓	(✓)	(✓)	(✓)	~	~	(✓)	(✓)
3 Reduce crime and fear of crime.	~	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)	~	~	(✓)	(✓)	~
4 Reduce deprivation and social exclusion.	~	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)	~	(✓)	~
5 Raise educational achievement levels and develop the opportunities for lifelong learning.	~	✓	~	~	~	~	(✓)	✓	(✓)	(✓)	(✓)	(✓)	~
6 Sustain economic growth and competitiveness and encourage innovation in higher value/lower impact activities.	(✓)	~	~	(✓)	(✓)	(✓)	(x)	~	~	~	(x)	~	~
7 Improve accessibility to services and facilities for all ages across the District.	(✓)	(✓)	✓	(✓)	✓	✓	✓	✓	(✓)	~	✓	(✓)	~
8 Encourage and facilitate increased engagement in cultural and leisure activities	~	~	✓	✓	(✓)	(✓)	(✓)	~	~	(x)	(✓)	~	(✓)
9 Improve efficiency in land use and encourage the prudent use of natural resources	~	~	(✓)	(✓)	(✓)	(✓)	✓	✓	~	~	✓	(✓)	(✓)
10 Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage.	~	(✓)	(✓)	(✓)	(✓)	(✓)	~	~	~	~	~	~	(✓)
11 Reduce emissions of Greenhouse gases.	(✓)	~	~	~	~	~	~	~	~	~	~	(✓)	~
12 Minimise the risk of flooding and resulting detriment to people and property.	~	~	(✓)	~	~	~	~	~	~	~	~	(✓)	(✓)
13 Maintain, improve and manage water resources in a sustainable way.	~	~	✓	(✓)	(✓)	(✓)	~	~	~	~	~	~	~
14 Conserve and enhance biodiversity.	(✓)	~	(✓)	(✓)	(✓)	(✓)	~	~	~	~	~	✓	~
15 Protect and enhance the high quality natural and built environment.	(✓)	(✓)	✓	✓	✓	✓	✓	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)
16 Reduce waste generation and disposal, and achieve the sustainable management of waste.	(✓)	(✓)	~	~	~	~	(✓)	(✓)	~	~	(✓)	~	~

Sustainability Appraisal Objective	Policy BEX11: Land at Sidley Sports and Social Club, Bexhill	Policy BEX12: Bexhill Town Centre	Policy BEX13: Bexhill Primary Shopping Area	Policy BEX14: Land south-east of Beeching Road, Bexhill	Policy BEX15: Bexhill Cultural Area	Policy BEX16: London Road - Sackville Road Enhancement Area	Policy BEX17: Little Common District Centre	Policy BEX17: Sidley District Centre	Policy HAS1: Combe Valley Countryside Park	Policy HAS2: Land at Michael Tyler's, Woodlands Way, Hastings	Policy HAS3: Land east of A265, Ivyhouse Lane, Hastings	Policy HAS4: Urban Fringe Management
1 Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home.	(x)	~	~	(x)	~	(✓)	~	~	~	(✓)	~	~
2 Improve the health and well-being of the population and reduce inequalities in health.	✓	~	~	(✓)	~	(✓)	~	(✓)	✓	(✓)	~	(✓)
3 Reduce crime and fear of crime.	~	~	~	~	~	(✓)	~	~	~	(✓)	(✓)	(✓)
4 Reduce deprivation and social exclusion.	(✓)	~	~	~	~	(✓)	~	(✓)	~	(✓)	(✓)	~
5 Raise educational achievement levels and develop the opportunities for lifelong learning.	(✓)	~	~	~	~	~	~	~	~	~	~	~
6 Sustain economic growth and competitiveness and encourage innovation in higher value/lower impact activities.	~	✓	✓	~	✓	(✓)	✓	✓	~	(x)	(✓)	~
7 Improve accessibility to services and facilities for all ages across the District.	(✓)	✓	✓	✓	✓	(✓)	✓	✓	✓	~	~	~
8 Encourage and facilitate increased engagement in cultural and leisure activities	✓	✓	✓	(✓)	✓	~	✓	✓	✓	~	(✓)	✓
9 Improve efficiency in land use and encourage the prudent use of natural resources	✓	✓	✓	(✓)	✓	~	~	~	~	(✓)	~	~
10 Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage.	~	(✓)	~	(✓)	~	(✓)	~	~	~	~	~	~
11 Reduce emissions of Greenhouse gases.	~	~	~	~	~	~	~	~	~	~	~	~
12 Minimise the risk of flooding and resulting detriment to people and property.	(✓)	~	~	(✓)	~	~	~	~	~	~	~	~
13 Maintain, improve and manage water resources in a sustainable way.	(✓)	~	~	~	~	~	~	~	~	~	~	~
14 Conserve and enhance biodiversity.	~	~	~	~	~	~	~	~	✓	~	(✓)	✓
15 Protect and enhance the high quality natural and built environment.	(✓)	(✓)	(✓)	(✓)	✓	✓	✓	✓	✓	~	(✓)	✓
16 Reduce waste generation and disposal, and achieve the sustainable management of waste.	(✓)	~	~	(✓)	~	~	~	~	~	~	~	~

Table 13: Summary Appraisal of Sites Policies (Rural Areas)

Sustainability Appraisal Objective	Policy BEC1: Land East of Hobbs Lane, Beckley Four Oaks	Policy BEC2: Land South of Buddens Green, Beckley Four Oaks	Policy BRO1: Land West of Northiam Road A28	Policy BRO2: Land South of Rainbow Trout Pub, Northiam	Policy CAM1: Land at the Former Putting Green, Camber	Policy CAM2: Land at Central Car Park, Camber	Policy CAT1: Land west of the B2204	Policy FAC1: Land at the Former Market Garden, Lower Waites Lane	Policy FAC2: Land east of Waites Lane	Policy HUR1: Land off Foundry Close to the east of Hurst Green	Policy HUR2: Caravan Tech premises, High Street, Hurst Green
1 Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home.	✓	✓	✓	✓	(✓)	(x)	✓	✓	✓	✓	✓
2 Improve the health and well-being of the population and reduce inequalities in health.	(✓)	(✓)	✓	(✓)	(✓)	(✓)	(✓)	(✓)	✓	~	~
3 Reduce crime and fear of crime.	~	~	~	~	~	~	~	~	~	~	~
4 Reduce deprivation and social exclusion.	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)
5 Raise educational achievement levels and develop the opportunities for lifelong learning.	~	(✓)	(✓)	(✓)	(x)	~	(✓)	(x)	(x)	(✓)	(✓)
6 Sustain economic growth and competitiveness and encourage innovation in higher value/lower impact activities.	~	~	~	~	~	✓	~	~	~	~	(x)
7 Improve accessibility to services and facilities for all ages across the District.	~	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)
8 Encourage and facilitate increased engagement in cultural and leisure activities	~	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)	~	(✓)	~
9 Improve efficiency in land use and encourage the prudent use of natural resources	✓	(x)	(✓)	(✓)	(✓)	(✓)	~	(✓)	~	~	✓
10 Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage.	~	(✓)	(✓)	(✓)	~	~	~	~	~	(x)	~
11 Reduce emissions of Greenhouse gases.	~	(✓)	~	~	~	~	~	~	~	~	(✓)
12 Minimise the risk of flooding and resulting detriment to people and property.	(✓)	(✓)	(✓)	~	(x)	(x)	(✓)	~	~	(✓)	(✓)
13 Maintain, improve and manage water resources in a sustainable way.	~	~	(✓)	~	~	~	~	~	~	~	~
14 Conserve and enhance biodiversity.	~	~	(✓)	~	(✓)	(✓)	~	~	~	~	~
15 Protect and enhance the high quality natural and built environment.	(✓)	(✓)	(x)	~	(✓)	(✓)	~	(✓)	(✓)	~	(✓)
16 Reduce waste generation and disposal, and achieve the sustainable management of waste.	~	~	~	~	~	~	~	~	~	~	~

Sustainability Appraisal Objective	Policy IDE1: Land South of Elmsmead, Iden	Policy NOR1: Land South of Northiam C of E Primary School	Policy NOR2: Land South of The Paddock/ Goddens Gill	Policy PEA1: Land South of Main Street, Peasmarsh	Policy RHA1: Land at Stonework Cottages	Policy RHA2: Harbour Road Employment Area	Policy WES1: Land at Westfield Down, Westfield	Policy WES2: Land at the former Moorhurst Care Home, Westfield	Policy WES3: Land off Goulds Drive, Westfield	Policy WES4: Land connecting Moor Lane and the A28
1 Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home.	✓	(✓)	✓	✓	✓	~	✓	✓	(✓)	~
2 Improve the health and well-being of the population and reduce inequalities in health.	~	(✓)	(✓)	✓	(✓)	~	✓	✓	(✓)	✓
3 Reduce crime and fear of crime.	~	~	~	~	~	~	~	~	~	~
4 Reduce deprivation and social exclusion.	(✓)	(✓)	(✓)	~	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)
5 Raise educational achievement levels and develop the opportunities for lifelong learning.	(x)	(✓)	(✓)	~	(x)	~	(✓)	~	~	~
6 Sustain economic growth and competitiveness and encourage innovation in higher value/lower impact activities.	~	~	~	~	(x)	✓	~	~	~	~
7 Improve accessibility to services and facilities for all ages across the District.	(✓)	(✓)	(✓)	(✓)	(✓)	~	(✓)	(✓)	~	(✓)
8 Encourage and facilitate increased engagement in cultural and leisure activities	(✓)	(✓)	(✓)	(✓)	(✓)	~	✓	(✓)	~	✓
9 Improve efficiency in land use and encourage the prudent use of natural resources	(x)	(x)	(x)	~	✓	✓	~	(✓)	(x)	~
10 Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage.	(✓)	(✓)	~	(✓)	~	(✓)	(✓)	✓	~	~
11 Reduce emissions of Greenhouse gases.	~	~	~	(✓)	~	~	(✓)	~	~	~
12 Minimise the risk of flooding and resulting detriment to people and property.	~	~	~	(✓)	~	~	(✓)	(✓)	(✓)	~
13 Maintain, improve and manage water resources in a sustainable way.	~	~	~	(✓)	~	~	~	~	~	~
14 Conserve and enhance biodiversity.	~	~	~	(✓)	~	~	~	~	~	~
15 Protect and enhance the high quality natural and built environment.	(✓)	~	(✓)	(✓)	~	(✓)	~	~	~	~
16 Reduce waste generation and disposal, and achieve the sustainable management of waste.	~	~	~	~	~	~	~	~	~	~

Table 14: Summary Appraisal of Other Spatial Policies

Sustainability Appraisal Objective		Policy GYP1: Land adjacent to High Views, Loose Farm Lane, Battle	Policy BEX3c: Land east of Watermill Lane (Gypsy and Traveller site only - Land rear of Preston Cottage)	Policy MAR1: Land at Felon's Field, Marley Lane
1	Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home.	✓	✓	~
2	Improve the health and well-being of the population and reduce inequalities in health.	(✓)	✓	~
3	Reduce crime and fear of crime.	(x)	(✓)	~
4	Reduce deprivation and social exclusion.	(✓)	(✓)	~
5	Raise educational achievement levels and develop the opportunities for lifelong learning.	(✓)	~	~
6	Sustain economic growth and competitiveness and encourage innovation in higher value/lower impact activities.	(✓)	(✓)	✓
7	Improve accessibility to services and facilities for all ages across the District.	(✓)	(✓)	(x)
8	Encourage and facilitate increased engagement in cultural and leisure activities	(✓)	(✓)	~
9	Improve efficiency in land use and encourage the prudent use of natural resources	~	~	(✓)
10	Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage.	(✓)	(✓)	(x)
11	Reduce emissions of Greenhouse gases.	~	~	?
12	Minimise the risk of flooding and resulting detriment to people and property.	~	~	(✓)
13	Maintain, improve and manage water resources in a sustainable way.	(✓)	(✓)	~
14	Conserve and enhance biodiversity.	(✓)	~	~
15	Protect and enhance the high quality natural and built environment.	(✓)	(✓)	(✓)
16	Reduce waste generation and disposal, and achieve the sustainable management of waste.	(✓)	~	~

#### Assessment Scoring – Symbols Explanation

Symbol	Explanation
✓	Potentially significant beneficial effect.
(✓)	Option supports the objective, or elements of the objective on balance, although effects may be minor.
~	Policy has no effect or is irrelevant, <b>OR</b> Overall effect is neutral insofar as the benefits and drawbacks appear equal and neither is considered significant.
?	Uncertain or insufficient information on which to determine the assessment at this stage.
(x)	Option appears to conflict with the objective on balance and may result in minor adverse effects.
x	Potentially significant adverse effects.

## **5.4 Summary of Likely Significant Effects of Plan and Alternatives against SA Objectives**

5.4.1 As noted in paragraphs 5.2.14 and 5.3.7 above, overall, the development policies and site allocations are found to have a wide range of sustainability benefits across a number of objectives. Inevitably, there are a few negative impacts, but these are all minor. In the case of the development policies, any negative impacts tend to reflect the different emphases of single topic policies, notably between environmental conservation and development-oriented policies. In the case of the site allocations, any negative impacts tend to reflect the tensions in making choices between different uses. In all cases, the balance of advantages can be clearly seen by the far greater beneficial effects, both minor and significant.

5.4.2 A summary of the significant social, environmental and economic effects of the DaSA policies is presented below by SA Objective.

### Objective 1: Ensure that Everyone has the Opportunity to live in a Decent, Sustainably Constructed and Affordable home

5.4.3 The significant effects on this SA Objective are beneficial. The plan successfully identifies a good supply of site-specific deliverable opportunities to meet the housing requirements of the Core Strategy. These support sympathetic accommodation of housing growth in sustainable locations and appear likely to be deliverable and viable.

5.4.4 Policies promoting affordable housing in line with the Core Strategy and new NPPF (including on rural exception sites); internal space standards; access standards; accessible and adaptable homes; specialist housing for older people; and appropriate external residential areas all have significant positive effects and will help ensure new development is designed so as to make good quality places for people to live. Other policies also have positive effects including those promoting water efficiency, renewable and low carbon energy, those preventing development on unstable land; and those which set out positive criteria for the development of residential extensions and other alterations.

5.4.5 There are some minor negative effects to this objective from policies relating to strategic gaps and one or two sites proposed for alternative uses rather than residential, although these effects are likely to be very minor in a wider District context.

### Objective 2: Improve the Health and Well-being of the Population and Reduce Inequalities in Health

5.4.6 Overall effects on health are positive. Positive effects stem from a number of housing policies that aim to improve the living environment, notably the policy on accessible and adaptable homes. Other housing policies also have positive effects, together with the policies that require the retention of sites of social or economic value and support equestrian development.

- 5.4.7 Environmental policies also have beneficial effects, such as policies on environmental pollution and biodiversity & green infrastructure.
- 5.4.8 Site-specific policies that lead to the provision of, or are readily accessible to, green infrastructure (with its acknowledged health benefits) are also beneficial, as are housing sites located in close proximity to medical facilities and one which includes the provision of a new facility (Policy FAC2).
- 5.4.9 Provision of sufficient recreational and open space opportunities also have a beneficial effect, notably the provision of Combe Valley Countryside Park (Policy HAS4) will provide a strategic scale open space and opportunity for enhanced recreation serving a wide area.

#### Objective 3: Reduce Crime and the Fear of Crime

- 5.4.10 Effects on this objective are overwhelmingly neutral. Those effects that have been identified relate to specific sites, their proximity to a police station (this applies mainly to sites in the Bexhill and Hastings Fringes areas) and/or the extent to which they may incorporate a degree of informal surveillance through overlooking and can potentially be designed in such a way as to reduce crime or the fear of crime.
- 5.4.11 In most cases, the details of scheme layouts will be a matter for the planning application decision process. Nonetheless, there are some sites that appear to have obvious advantages or disadvantages in this respect; hence, the identification of some effects, with the greater balance being positive.
- 5.4.12 It should be noted that development management decisions on individual applications should be informed by the Core Strategy policy EN3 which seeks to apply 'Secured by Design' principles and was already subject to SA as part of the Core Strategy process. Therefore, to a large extent this issue has already been considered and positively addressed by the overarching Part 1 of the Local Plan.

#### Objective 4: Reduce Deprivation and Social Exclusion

- 5.4.13 Most policies have been judged to have either a neutral, or a minor beneficial effect, on reducing deprivation and social exclusion. Those with positive effects include some of the housing policies, particularly those promoting affordable housing (including on rural exception sites); accessible and adaptable homes; and specialist housing for older people. Depending on their location, a significant number of sites identified are considered to have positive effects due to promoting integration with existing communities.
- 5.4.14 It should be noted that overarching Core Strategy policies, particularly on economy and affordable housing, have previously been assessed as having a positive effect on this objective. The policies that carry forward those strategic policies, especially in relation to affordable housing and housing access standards, as well as existing employment sites, are similarly found to be beneficial in terms of helping reduce deprivation.

#### Objective 5: Raise Educational Achievement Levels and Develop the Opportunities for Lifelong Learning

- 5.4.15 Overall, there are some beneficial effects for this objective from the plan. There has been a considerable focus on locating development in locations with good accessibility to education facilities. This is in accordance with the service centre approach outlined in more detail in the commentary on objective 7.
- 5.4.16 Bexhill has a college and two secondary schools. Other Rother settlements with secondary schools are Battle, Rye and Robertsbridge. There are many primary schools, including in most of the larger villages (see Rural Settlements Study Appendix 2 for more details of primary school locations). Therefore, development sites that are accessible to these facilities are considered more sustainable, with particular weighting on walking distance to primary schools and a secondary emphasis on public transport accessibility to all education establishments. While a small number of housing sites are in villages without a primary school, all of these are accessible by public transport to a school and/ or larger settlement and consequently, any negative scores are only of a minor nature.

#### Objective 6: Sustain Economic Growth and Competitiveness and Encourage Innovation in Higher Value, Lower Impact Activities

- 5.4.17 Cumulatively, the plan has a positive effect on economic growth. In particular, Policy DEC3 offers valuable protection to existing employment sites, whereas Policy DCO1 similarly offers some protection to sites of social or economic value. Policy DIM1 on comprehensive development is considered beneficial on balance in promoting mixed-uses sites that secure a range of benefits, including economic, in addition to residential.
- 5.4.18 Policies that define town centre and commercial areas (BEX12, BEX13, BEX15, BEX16, BEX17) are also viewed to have a positive effect on economic growth and competitiveness. A small number of sites have a minor negative assessment on this factor in situations where the current, or most recent, use was economic or commercial; or such uses were realistic alternative to development. Conversely, there are a handful of specific allocations of economy and employment which obviously will have a positive effect on this SA objective, including: BEX1 - Land at Levetts Wood and Oaktree Farm, Sidley; MAR1 - Land at Felon's Field, Marley Lane; and HAS3 - Land east of A265 Ivyhouse Lane, Hastings.
- 5.4.19 As with other SA objectives, the adopted and overarching Core Strategy, has in effect informed the DaSA throughout, so the positive effects identified in the SA of the Core Strategy remain applicable here.

#### Objective 7: Improve Accessibility to Services and Facilities for all Ages Across the District

- 5.4.20 Overall, there are beneficial effects for this objective from the plan. The original Core Strategy distribution of development was based primarily on a 'service centre' approach. The DaSA follows on from and conforms with the Core Strategy. Therefore, there has been an in-built focus on locating development in locations with good accessibility to education facilities particularly primary schools. The overwhelming majority of sites score positively in this respect, as do policies that define town centre and commercial areas (BEX12, BEX13, BEX14, BEX15, BEX17).

#### Objective 8: Encourage and Facilitate increased Engagement in Cultural and Leisure Activities

- 5.4.21 Generally, the plan has a positive effect on this objective. Perhaps the most significant policy in the plan in terms of Objective 8 is BEX15 which proposes to define a 'Bexhill Cultural Area' where arts, culture and tourism will be the primary focus.
- 5.4.22 Larger cultural facilities (theatres, cinemas, galleries, libraries) are quite limited within the District, being mainly confined to nearby Hastings, Bexhill and to a lesser extent to Battle and Rye.
- 5.4.23 Smaller and more local-serving community and leisure facilities (community halls, places of worship, play areas, sports pitches) are more widespread and commonly found in larger villages as well as higher order centres.
- 5.4.24 Many generic policies are neutral or not relevant to this objective, although Policy DCO1 which seeks to protect sites of social value is a notable positive effect. Policies DCO2 (equestrian developments), DEC2 (holiday sites) and some of the environmental policies also score positively; the biodiversity and green space policy, for example, scoring positively due to its promotion of green infrastructure. Most site allocations are positive, since their proximity to cultural and leisure facilities have been a key factor in the consideration of their suitability.

#### Objective 9: Improve Efficiency in Land Use and Encourage the Prudent use of Natural Resources

- 5.4.25 Whilst the balance of effects on this objective are positive, objective 9 is one of the objectives where complete positive effects would be difficult to achieve for the reasons set out in section 4.2. For example; national and local policy has clear direction for making the most effective and efficient use of land, prioritising previously developed land. However, in Rother the scale of development required inevitably means that development of green-field sites will be necessary. Therefore, the significance of beneficial effects is reducing over time as previously developed land and infill opportunities unfortunately become scarcer.

- 5.4.26 The vast majority of the District's agricultural land, including all that has been considered for development, is of average quality (grades 3 or 4). Smaller areas of higher quality (grades 1 and 2) are located towards the east of the District along the Brede Valley and across the East Guldeford levels. Such areas have not been considered for suitable for development, although for reasons not solely related to agricultural land quality.
- 5.4.27 The ability of a site to make best use of developable land and apply suitable density standards has been a factor in considerations on a site by site basis, for which most site-specific policies respond positively. Negative factors on specific sites relate to the immediate availability of utility services on site.
- 5.4.28 Positive scores may also partially derive from the scope of a site to be laid out on an east-west axis and take advantage of both passive solar gain and solar technology. However, in most cases the ability to orientate layout is largely dictated to be the site shape, topography and access point.

Objective 10: Reduce Road Congestion and Pollution Levels and ensure Air Quality continues to Improve by Increasing Travel Choice and Reducing Car Usage

- 5.4.29 In a rural District that is accommodating significant growth, positive scores for *reducing road congestion* are difficult to achieve, particularly as public transport options also tend to be limited or infrequent, and subject to increasing economic pressures nationwide.
- 5.4.30 Nonetheless, the plan has endeavoured to increase travel choice by prioritising accessible locations. This includes, on a macro scale, locations with public transport connections and, on a micro scale, locations with pedestrian footway connectivity, or at least scope to provide it. In addition, many sites' layout schemes have prioritised "permeability" and hence direct connections for pedestrian and cyclists. To a large extent, the number of positive scores for sites against this objective reflects the extent to which these aims have been successfully achieved.
- 5.4.31 Prioritising such locations has multiple positive synergistic effects. Public transport routes may benefit from increased patronage and become more economically viable as a consequence. Residents given the opportunity to safely walk or cycle are more likely to do so, benefitting their health in the process. In turn, accessible services may reap the benefits of increased custom, be more viable and more likely to remain operating as a result.
- 5.4.32 Inevitably, road congestion and use of the private car is something that planning only has so much ability to influence; since individuals are free to exercise their choice to use the private car, no matter how much the built environment is designed to incentivise alternative transport modes. For this reason, while individual sites may receive positive scores for endeavouring to facilitate travel choice, the cumulative effect across the plan area may still be negative in the long term, simply due to increases in population and the relative convenience of the private car.

#### Objective 11: Reduce Emissions of Greenhouse gases

- 5.4.33 An increase in the number of households and businesses in the District has the potential for an adverse effect on reducing greenhouse gas emissions, although the plan makes positive efforts to reduce the need to travel by car on a site-by-site basis by promoting walking and cycling .
- 5.4.34 Core Strategy Policy SRM1 was supportive of renewable energy, subject to consideration of other plan constraints, and DaSA policies DRM2 and DRM3 build on that policy (while also replacing part (i) as it has been found to be unduly onerous and not necessary in light of existing Building Regulations requirements), providing in-principle support for low carbon and renewable energy schemes except large-scale wind turbines which would have significant landscape impacts, and requiring the largest developments to demonstrate due regard has been had to energy efficiency, including through the use of renewable and low carbon technologies.
- 5.4.35 The plan will probably avoid a net loss of trees, since all areas of woodland have been avoided. There may even be some net gain in trees and hedgerows as a result of the plan's implementation, as several sites require a supporting landscaping scheme and/or green infrastructure. However, the effects are likely to be in the long term, rather than immediate, given the necessary time for trees and landscaping to reach maturity.

#### Objective 12: Minimise the Risk of Flooding and Resulting Detriment to People and Property

- 5.4.36 The effects on objective 12 are overwhelmingly positive. Notably policy DEN5, with its emphasis on sustainable drainage (SuDS) as well as the means to achieve this, is a major positive. Promotion of wetland habitats under Policy DEN4, which may have a multi-functional benefit as SuDS, may also be indirectly beneficial.
- 5.4.37 The majority of site allocations have successfully avoided or mitigated significant flood risk. Scores are therefore generally positive and reduce the proportion of properties at risk from flooding in the District.
- 5.4.38 Amongst the many positives, there are two allocations in Camber where minor negative impacts are identified, due to being located with flood zones (or accessed via flood zones), notwithstanding protection by coastal defences. However, the policies (CAM1 and CAM2) seek to mitigate these through requiring site specific flood risk assessments.

#### Objective 13: Maintain, Improve and Manage Water Resources in a Sustainable Way

- 5.4.39 The plan, particularly Policy DRM1, will have a positive effect on water efficiency by applying a higher water efficiency standard.

- 5.4.40 The promotion of SuDS via policy DEN5 also will have a positive effect in improving water quality and minimising the risk of pollution to water sources. A particular issue with the Pevensey Levels water quality, highlighted in the HRA process, has also been addressed by Policy DEN5.
- 5.4.41 Site policies are also generally positive, avoiding groundwater source protection zones / aquifers and generally positively incorporating watercourses within layouts.

Objective 14: Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats

- 5.4.42 The DaSA's policies have been subject to a Habitats Regulations Assessment, with specific reference to the international nature conservation sites in and around the district. Overall, it finds that the DaSA will not have an adverse effect on the integrity of these sites. It has informed policies DEN4 - Biodiversity and green space, and DEN5 – Sustainable Drainage, as well as allocations in the vicinity of the Pevensey Levels and the Dungeness complex of designated sites, where mitigation measures are required.
- 5.4.43 Two spatial policies: HAS1 – Combe Valley Countryside Park and HAS4 – Rock Lane Urban Fringe Management – also have notable beneficial effects on this objective.
- 5.4.44 The positive measures required by DEN4, including a focus on provision of priority habitats and connectivity, as well as the avoidance of harm to existing ecological features and seeking net gains, have been applied to site allocation policies. This is reflected in the number of positive scores for many sites, with none showing adverse effects on the biodiversity objective 14.

Objective 15: Protect and enhance the high quality natural and built environment including landscape and townscape character and particularly the protection of the High Weald AONB.

- 5.4.45 Several DaSA development policies are identified as having positive effects on townscape and built environment. Policies DEN1 and DEN2 have a notably positive effect on landscape and High Weald AONB character, supported by DEN3 – Strategic Gaps, DEN4 – Biodiversity and Green Space and DEN7 – Environmental Pollution.
- 5.4.46 Some housing policies (notably DHG9, DHG10, DHG11 relating to extensions, annexes and boundary treatments) and DEC1 – Shopfronts, signage and advertising - will have positive effects in terms of townscape.
- 5.4.47 In addition, many site-specific policies are also deemed to have a positive effect, despite many being greenfield sites within the AONB itself. They have been carefully selected to avoid negative landscape impacts as far as possible, particularly on the High Weald AONB. Where appropriate, policy criteria promote typical landscape features within developments.

- 5.4.48 One site, BRO1 at Broad Oak, is nonetheless still assessed as having a minor adverse landscape (AONB) effect. However, this is offset by a number of economic, social and other environmental benefits.

Objective 16: Reduce Waste Generation and Disposal, and Achieve the Sustainable Management of Waste

- 5.4.49 Effects on objective 16 are largely neutral. Policy DHG7 is deemed to be positive in setting a clear policy direction for refuse/recycling standards in relation to external residential areas.
- 5.4.50 There are two household waste recycling facilities in the District – at Mountfield (on the A21 north of Battle) and at Pebsham (Between Bexhill and Hastings). Development locations accessible to these two sites, and to a secondary extent, accessible to the more numerous ‘bring’ recycling sites are deemed to score more positively against objective 16.

## **5.5 Cumulative and Synergistic Effects**

Cumulative Effects

- 5.5.1 The cumulative effects are those that result from the interaction of all policies and policy options, and also with other plans, policies and programmes.
- 5.5.2 Consequently, the adverse impacts of some policies on a particular SA Objective may be outweighed by the benefits of others. Indeed, section 5.2 highlighted, on an objective by objective basis, that whilst overall effects may be positive and beneficial, there may still be discrete negative effects from individual policies.
- 5.5.3 Sections 5.2 and 5.3 demonstrate that the policies address the majority of SA Objectives in a positive, supportive manner and contribute to the achievement of them. However, there are two SA Objectives in particular that could suffer from cumulative, potentially adverse effects from development and growth, these being:
- Reduce Road Congestion
  - Reduce emissions of Greenhouse gases
- 5.5.4 Inevitably, road congestion and use of the private car is something that planning only has so much ability to influence; since individuals are free to exercise their choice to use the private car, no matter how much the built environment is planned to incentivise alternative transport modes. This is an inherent difficulty in the process. For this reason, while individual sites may receive positive scores, the cumulative effect across the plan area may still be negative in the long term, simply due to increases in population and the relative convenience of the private car.

- 5.5.5 However, for Bexhill, where most housing and business development is proposed, town-wide traffic modelling has provided a means to assess cumulative impacts. The modelling for 2028 has shown that there will be capacity across the network. It may be very close to capacity in certain locations, which lends weight to incorporating measures that encourage sustainable transport options as part of relevant policies.
- 5.5.6 In terms of air quality, the most ecologically sensitive areas have been considered through the Habitats Regulations Assessment. This has regard not only to the policies of the DaSA but also those likely to come forward through Neighbourhood Plans in the district, as well as considering local development plans in combination with those in adjacent areas. Elsewhere, economic growth policies, including the tourism sector, which may contribute to overall emissions and pollution levels, are carefully considered in terms of their net impacts. For example, business development in Bexhill is found to reduce net commuting out the district, with shorter journeys, less impact on vulnerable sites and more scope for use of non-car modes. Home working is strongly supported. In the wider context, the Government's commitment to scrapping petrol and diesel cars should also have a positive impact on background emission levels during the plan period, while the local highway authority's transport plans (see 5.6.7 below) can also mitigate background growth in traffic and related emissions.

#### Synergistic Effects

- 5.5.7 Synergistic effects can be described as those that are greater than the sum of the individual effects. There are several examples of positive synergistic effects in the plan, including the following:

- a) *The promotion of sustainable forms of transport (e.g. bus, train, walking, cycling) as a means to reduce road congestion.*

This has multiple positive synergistic effects. Public transport routes and providers may benefit from increased patronage and become more economically viable as a consequence. Residents, when given the opportunity to safely walk or cycle, are more likely to do so, benefitting their health in the process. In turn, locally accessible services may reap the benefits of increased custom, be more viable and more likely to remain operating –benefitting the local economy, community cohesion and social inclusion as a result. As a consequence of these synergies, the overall cumulative effects are overwhelmingly positive.

- b) *The promotion of SuDS to reduce flood risk.*

This may have a synergistic benefit for ecology and biodiversity via the creation of ponds, wetland habitats and green space, which in turn have an educational value 'on the doorstep' of residential areas, increasing awareness of ecological issues. Several protected species (such as the Great Crested Newt) rely on wetland habitats. SuDS may also benefit the character of the High Weald AONB, for which ponds are a key feature.

If sensitively designed, SuDS may provide good quality amenity spaces for the enjoyment of residents, in turn benefitting their health and quality of life. The provision of good quality “green and blue” infrastructure has been demonstrated to have economic benefits, enhancing the attractiveness of locations as a place to live and to work.

c) *Protecting and enhancing the high quality built environment.*

Protecting, enhancing and avoiding negative impacts upon sites and features of historical, archaeological or cultural interest is an important goal in its own right. Another consequence may be to promote tourism to the area, which is in turn beneficial to the local economy. The employment opportunities generated by the tourist economy may in turn help reduce wider deprivation issues.

## **5.6 Ways of Mitigating Adverse Effects and Maximising Beneficial Effects**

5.6.1 This section, in accordance with the SEA Directive, SEA and SA guidance, looks at mitigation measures designed to prevent, reduce or offset the significant adverse environmental, social and economic effects of the Plan and its policy components. Mitigation measures can also include recommendations for enhancing the beneficial effects of policies.

5.6.2 As highlighted in section 4.2 and Table 4, there is an inherent incompatibility of some SA objectives, particularly linked to SA objectives 1 and 6, such that it is not possible to mitigate all negative effects. However, throughout the SA of policies and allocations, mitigation has been considered in the consideration of options and in the drafting of policies.

5.6.3 At the site-specific scale, section 5.3 and Appendix 4 shows that the SA of site allocation policies is consistently more positive than the related option, reflecting the incorporation of mitigation provisions within them.

5.6.4 However, other policies have a mitigating role in themselves in limiting potentially damaging environmental impacts of the plan as a whole:

- *Policy DRM1: Water Efficiency*
- *Policy DRM2: Renewable Energy Developments*
- *Policy DRM3: Energy Requirements*
- *Policy DEN1: Maintaining Landscape Character*
- *Policy DEN2: The High Weald Area of Outstanding Natural Beauty*
- *Policy DEN4: Biodiversity and Green Space*
- *Policy DEN5: Sustainable Drainage*
- *Policy DEN6: Land Stability Policy*
- *DEN7: Environmental Pollution*

- 5.6.5 It may be seen from the development policy and site allocations assessments, in Appendices 3 and 4 respectively, the mitigation of potentially negative sustainability impacts has been incorporated into the formulation of the policies themselves, through the use of criteria. Indeed, the regard to environmental, social and economic dimensions of sustainability has generally been integral to the drafting of the policies from the beginning.
- 5.6.6 Mitigation can be seen in both topic policies, for example where those for equestrian developments, rural exception sites, advertisements and holiday sites refer to avoiding adverse landscape impacts, and site allocations, where many policies have specific requirements for sustainable drainage. In fact, all site allocations set out criteria, which set out mitigation measures in many instances.
- 5.6.7 Reference may also be made to proposed mitigation within other plans of partner organisations that will bear upon the sustainability effects of policies, including:
- The ESCC Local Transport Plan and its supporting Implementation Plan (in terms of encouragement of sustainable transport options and modal shift, measures to address congestion); and
  - The ESCC Waste & Minerals Plan, in terms of waste reduction, promotion of sustainable resource management, etc.
  - The High Weald AONB Management Plan, in terms of measures promoting the preservation and enhancement of the character of the designation (which covers 83% of the District).

## 6. MONITORING

### 6.1 Monitoring

6.2.1 With reference to Figure 1, Task B5 requires the SA to *‘Propose measures to monitor the significant effects of implementing the Local Plan’*.

6.2.2 The specific requirements of the SEA Regulations on monitoring are to:

*“Monitor the significant environmental effects of the implementation...with the purpose of identifying unforeseen adverse effects at an early stage” (Regulation 17(1))”.*

This will enable local planning authorities to identify unforeseen adverse effects at an early stage and to enable appropriate remedial actions.

6.2.3 The sustainability framework (Section 4.1) is a good starting point for developing targets and indicators for monitoring, which are in turn reflected in the updated Baseline Information, as set out in Appendix 2.

6.2.4 Baseline information for the DaSA SA has previously been published within the DaSA SA Scoping Report (August 2016) and the Initial Sustainability Appraisal Report of the Options and Preferred Options version of the DaSA. The updated Appendix 2 of this SA report shows that the consideration of sustainability impacts is undertaken using the most up-to-date baseline information. Moreover, the Council is committed to thorough and on-going monitoring across the full range of strategic environmental, social and economic objectives through its annual Local Plan Monitoring Report. This has 119 indicators, which provide a comprehensive monitoring framework – see <http://www.rother.gov.uk/AMR>.

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