

ROTHER DISTRICT COUNCIL

Core Strategy Consultation on Strategy Directions

Initial Sustainability Appraisal Report

November 2008



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1 NON TECHNICAL SUMMARY

1.1.1 Introduction

- 1.1.2 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.
- 1.1.3 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 as a result of legislative changes enacted in the UK in summer 2004.
- 1.1.4 The combined process reviews plans against a set of criteria reflecting local problems and the LPA's objectives in delivering Sustainable Development and addressing these problems.
- 1.1.5 This report is the combined output of the SA and SEA processes and hereafter is called the SA. The stages of the SA preceding this report culminated in the production of a SA Scoping Report (available upon request from the Council), which documents the results of the gathering of evidence concerning the current social, economic and environmental conditions in the District.
- 1.1.6 The Scoping Report identifies 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. Section 3.5 of this SA Report contains the full range of sustainability problems identified in the SA Scoping Report.

The Local Development Framework and the Core Strategy

- 1.1.7 Rother District Council is currently preparing its Local Development Framework (LDF), a set of planning policy documents, which will replace the existing Local Plan. This document concerns the Core Strategy Development Plan Document (DPD) – which sets the overall spatial vision, objectives and policies for Rother District.
- 1.1.8 The long term spatial vision for the District, extracted from the Core Strategy *Consultation on Strategy Directions Document*, is shown in the yellow box overleaf.
- 1.1.9 The Core Strategy is a key planning document under the new planning regime. It is also a key component in the delivery of the Community Strategy (a strategy all local authorities are required to produce in partnership with representatives from local bodies and interest groups,

with the aim of improving the future economic, social and environmental well being of the area).

Vision for Rother in 2026

Rother District will be recognised for its high quality of life where there is a strong emphasis on community life. This will have been achieved by continuing to support, and further develop, vibrant, safe, balanced and inclusive communities.

Sustainable economic growth will have been secured, with much improved job opportunities, and which encourages young people to stay in the area and provides greater prosperity for all.

Improved economic and social well-being will be facilitated by better access to jobs and services for all ages, in both urban and rural areas, and improved connectivity with the rest of the region.

The area's outstanding environmental and cultural assets will continue to be highly valued and conserved. Sensitive stewardship of environmental resources will be integral to a local commitment to a more sustainable future and a responsible, positive approach to helping address climate change issues.

Development and change will have contributed significantly to meeting local needs and aspirations. It will have responded positively to the area's particular local circumstances and environmental resources, as well as according with the South East Plan.

Bexhill will have retained and strengthened its distinct identity and become one of the most attractive places to live on the south coast - attractive to families, the young and older people alike. As the main focus of development in the district, it will be playing its part within an integrated approach to securing a more prosperous future for the Bexhill and Hastings area.

Battle continues to be a thriving small market town and tourist centre which retains its essential character, with sensitive conservation of its historic core and setting.

Rye has improved economic and social circumstances with a stronger and more sustainable market town role, tourism sector and Port. This will have been achieved whilst fully respecting and sensitively managing its historic character, vulnerability to flooding and ecologically important setting.

Rural areas of the district will have evolved "organically" in a manner sensitive to their essential character, diversity and relationship with their surroundings. Villages will be vibrant and inclusive, while the countryside will be economically active, accessible and well-managed.

- 1.1.10 The Council has prepared its Core Strategy Directions on the basis of the consultation on the Issues and Options between October and December 2006.
- 1.1.11 The Core Strategy is also progressed with full regard to the Council's Corporate Plan which sets out the Council's contribution to achieving the Community Strategy.
- 1.1.12 It is concerned with 'place-shaping' and will establish the way in which the social, economic and environmental needs of the area can be delivered in the most sustainable way.
- 1.1.13 It provides broad guidance on the scale and distribution of development and the provision of supporting infrastructure. It also contains 'higher level' policies for delivering the spatial vision. It aims to ensure that investment decisions are not made in isolation, but are properly co-ordinated, with a focus on promoting the principles of sustainable development.

The SA process so far

- 1.1.14 The outcome of the preliminary 'Scoping' stage of the SA process is a set of Sustainability Objectives created to address the sustainability problems. These objectives can then be used collectively as a means to assess the Core Strategy Plan Objectives, Options and Strategies.
- 1.1.15 The statutory environmental agencies (Natural England, the Environment Agency and English Heritage) were consulted on the SA Scoping Report in August 2006 and again between December 2007 and February 2008 because the scope was updated.
- 1.1.16 To comply with the SA/SEA process the Council's Strategic Options and Spatial and Thematic Strategies for the Core Strategy, which set out the key elements of the planning framework for Rother, have been reviewed against the Sustainability Objectives bearing in mind the following:
- Relevant government planning policy guidance on Local Spatial Planning PPS12
 - The extent to which the option supports other planning policy, for example, the Community Strategy, the Local Transport Plan and the key regional document the South East Plan
 - Evidence from the environmental baseline about local conditions and problems
 - Representations received in the initial consultation on the Issues and Options between October and December 2006
 - Guidance and best practice documents including the ODPM SA SEA Guidance Documents

- Other relevant guidance issued by bodies such as the Environment Agency, Natural England, English Heritage and the RSPB on matters such as biodiversity, land use and climate change

1.1.17 Options were developed for the following policy areas (more detail of the options can be found in Appendix 3 of the Initial SA Report):

- **The scale of growth**
 - Option 1 = 5,600 dwellings in line with South East Plan
 - Option 2 = 7,000 = +25% of South East Plan quota
- **The Overall Distribution of Development up to 2026**
 - Option 1 = Based on relative proportion of current population
 - Option 2 = Based on service centre role
 - Option 3 = Trend-based option
 - Option 4 = Based on the extension of current housing commitments to 2011
 - Option 5 = Based on housing needs
- **Bexhill**
 - Option 1 = Maintain Bexhill's role
 - Option 2 = Expand Bexhill's role
 - Option 3 = Coordinated approach to the Bexhill/ Hastings area
- **Battle**
 - Option 1 = Continued development to support the town's role
 - Option 2 = Limited growth
- **Rye**
 - Option 1 = Strengthen the market town role of Rye and the commercial role of Rye Harbour and the Port of Rye
 - Option 2 = Strengthen the social functions of Rye and Rye Harbour and make the most of the important environmental circumstances
- **Rural Areas (Villages)**
 - Option 1 = continue to focus on service centres
 - Option 2 = Development to support community needs and deficiencies
 - Option 3 = Focus development on few larger villages
 - Option 4 = Dispersed development
 - 4a: Population based across villages
 - 4b: Historic farmstead based
 - Option 5 = Focus development on transport corridors
- **Rural Areas (Countryside)**
 - Option 1 = Continue to limit development in the countryside
 - Option 2 = support more extensive development in the countryside
 - Option 3 = Override countryside policy
- **Communities (Affordable Housing Percentage)**
 - Option 1 = Continue with the percentages set out in Local Plan Policy HG1
 - Option 2 = Adjust percentage 50% rural villages; 40% Rye and Battle; 35% Bexhill
- **Communities (Affordable Housing Threshold)**

- Option 1 = Continue with the thresholds set out in Local Plan Policy HG1
- Option 2a = Lower threshold in all urban areas
- Option 2b = Lower threshold in Rye and Battle, maintain Bexhill
- Option 3a = Lower threshold in rural areas
- Option 3b = all developments 3+4 bed to provide 1 affordable
- **Communities (Affordable Housing Type)**
 - Option 1 = 25% social housing and 10% intermediate on all sites
 - Option 2 = 20-25% social rented on Bexhill major sites and 15-20% intermediate
 - Option 3 = Mix of 10%-20% intermediate, 20%-30% social rented in rural areas
- **Communities (Affordable Housing Allocations)**
 - Option 1 = Retain principle of exception sites in line with Local Plan
 - Option 2 = Allocate small sites (less than 10 dwellings) wholly or substantially for affordable housing in areas of need
- **Communities (Housing Mix)**
 - Option 1 = Retain Local Plan policy of 30% requirement of 1&2 bed properties as stands
 - Option 2 = Aim for a higher target of 40% in rural areas, where the need is greatest
- **Economy**
 - Option 1 = Make generous provision for sites and premises
 - Option 2 = Set aside only modest areas for employment uses.
- **Environment (Design Quality)**
 - Option 1 = Maintain a general expectation of design quality
 - Option 2 = Set achieving high design quality as a central theme in the planning process
- **Environment (Biodiversity and Greenspace)**
 - Option 1 = Using existing policy to conserve and enhance natural green space when opportunities arise
 - Option 2 = Identify areas where there is potential for improvement
- **Environment (Sustainable Resource Management)**
 - Option 1 = Promotion and application of new Government targets
 - Option 2 = Extend beyond the Government targets and set locally specific targets and criteria where appropriate
- **Transport and Accessibility**
 - Option 1 = Focus on investment in road and rail transport
 - Option 2 = Focus on investment in improvements in local transport infrastructure and services

1.1.18 It should be noted that options are not necessarily mutually exclusive and could therefore be implemented in combination with other options.

1.1.19 There are some areas of policy where it has been considered that there are no reasonable alternatives, for example on flood risk and

Gypsy and Traveller permanent site provision; therefore no options have been assessed in the SA for these areas. The policies themselves will be subject to SA when all the policies are tested for sustainability and published at the next, 'pre-submission' stage.

1.2 Outcomes of the Sustainability Appraisal Process

- 1.2.1 The following table documents those options that the Council has accepted and those it has rejected and the reasons for this. The full appraisal of the options can be found in Appendix 4 of the Initial SA Appendices Report.

Table 1.1 *Options accepted and rejected and the reasons*

Option	Reason for Acceptance or Rejection
Scale of Growth	
1	Accepted – Analysis against SA and Plan Objectives support this option
2	Rejected – economic, infrastructure and environmental concerns
SPATIAL OPTIONS	
Spatial Distribution of Growth	
1	Accepted in part - used to moderate Option 2
2	Accepted moderated by need and accessibility
3	Rejected – Analysis against SA and Plan Objectives show could be unacceptable levels of growth for some villages
4	Rejected – Analysis against SA and Plan Objectives show could be unacceptable levels of growth for some villages and the market towns
5	Accepted in part - used to moderate Option 2 in terms of housing needs, but could be unacceptable levels of growth for the market towns
Bexhill	
1	Accepted in conjunction with Option 3
2	Rejected as economic growth forecasts and housing market conditions do not support this growth agenda; uncertainty over infrastructure provision and cumulative impact on town's character
3	Accepted in line with Plan Objectives and shared vision moderated by Option 1 recognising Bexhill's independent but complementary function vis à vis Hastings, as well as its own priorities for future well-being
Battle	
1	Accepted – cross check against SA and Plan Objectives has shown that careful implementation of this option would be more beneficial than a lower growth option in terms of recognising Battle's service centre role and providing for

	local economic, housing and community needs subject to environmental acceptability	
2	Rejected – option would not provide adequate support for the local economic, housing and community needs	
Rye		
1	Accepted in part	Assessment against the SA and Plan Objectives has found that an amalgam of the two options would best address the particular circumstances of the area. A balance is required between housing and employment whilst minimising adverse effects on the high quality natural, built and historic environment, notwithstanding the need to plan carefully with regard to flood risk taking into account climate change
2	Accepted in part	
Rural Areas (labelled A-E in the Core Strategy)		
1	Accepted taking into account environmental constraints, local needs (Option 2) and accessibility (Option 5)	
2	Accepted in part – does the most out of all options to address affordable housing but doesn't necessarily seek the most sustainable options	
3	Rejected – focussing development on a small number of villages may have a negative impact on the cohesiveness of those settlements, furthermore smaller villages in the District may be denied development which could be used to facilitate community services and facilities	
4a	Rejected – although option may distribute development in a way that is perceived as 'equal', population is not always a gauge to accessibility, provision of services or local needs and therefore the option may be contrary to sustainable planning. SA assessment shows that the option has a greater potential for adverse effects than options 1-3	
4b	Rejected at outset – such a policy is contrary to national (PPS3 and PPS7) and regional planning policy, SA identified potential adverse affects for improving accessibility and reducing car use. Matters dealt with in this option overlap more directly with the issues of exception site policy and key worker affordable housing	
5	Accepted in part – concern over the issues of encouraging car use and withholding development from other buoyant local service villages such as Northiam and Peasmarsch	
Rural Areas - Countryside		
1	Accepted – option offers the best and most appropriate level of protection for the AONB. In terms of addressing rural housing needs the option should be mitigated to ensure greater provision of affordable housing particularly for those employed in local land-based economies and ensure the option does not lead to increased deprivation in rural areas due to a lack of affordable housing	

2	Rejected – the results of the SA show a number of uncertainties with this option as it stands. It is considered that there would be unacceptable adverse impacts for the AONB and its historic settlement pattern. The SA identifies adverse impacts in relation to the need to reduce traffic movements, improve air quality and reduce greenhouse emissions
3	Rejected – contrary to PPS3 Housing, PPS7 Sustainable Development in Rural Areas and PPG13. South East Plan recently had supporting policy removed through the Panel Report
CROSS-CUTTING OPTIONS	
Communities – Affordable Housing	
Affordable Housing Percentage	
1	Undetermined – the SA has shown a flat 40% doesn't at present recognise the different requirements within different parts of the District, particularly between Bexhill and the rural area. Waiting for the input from consultation.
2	Undetermined - lowering the requirement to 35% for Bexhill should help facilitate development in the District's largest urban service centre. Waiting for the input from consultation.
Affordable Housing Threshold	
1	Rejected - the Affordable Housing SPD has resulted in increased delivery of affordable housing; however the problem of affordability is still intensely felt and could be addressed further.
2 (a)	Rejected - the Housing needs Survey 2005 demonstrated particularly high housing need in Rye and Battle, which suggests that a distinction should be made between the two market towns and Bexhill. This option makes no such distinction.
2 (b)	Accepted in principle – waiting for input from consultation.
3 (a)	Accepted in principle – waiting for input from consultation. SA highlights that if the threshold were 50% option 3a would result in the delivery of more affordable housing than option 3b.
3 (b)	Accepted in principle – waiting for input from consultation. if the threshold were 50% option 3a would result in the delivery of more affordable housing than this option.
Affordable Housing Type	
1	Rejected - this option would rigidly and inflexibly apply the Draft South East Plan stipulation that the mix should include at least 25% social-rented and at least 10% intermediate. This option would apply blanket proportions to urban and rural areas which evidence shows have different needs.

2	Accepted - evidence shows that on sites in rural Rother, Rye and Battle the balance should be tilted slightly more towards social housing – SA supports this option showing the potential for more significant beneficial effects.
3	Accepted – the HMA showed the stock of social rented housing in Rural Rother has been eroded by the ‘right to buy’ therefore this option provides a way to redress the balance by increasing the percentage of social rented required on new sites.
Affordable Housing Allocations	
1	Accepted – the SA concludes that policy remains a positive step to address the issue of affordable housing shortage and should be retained.
2	Accepted - should supplement the provision of affordable housing in settlements of particular need.
Communities - Housing	
Housing Mix	
1	Rejected – the SA has highlighted that this option may not be appropriately addressing the housing need
2	Accepted – a higher proportion of one and two bed properties than the current local plan requirement of 30% would seem to be heavily supported by evidence. The SA supports this option.
Economy	
1	Accepted – assessment against Sustainability Objectives has shown that Option 1 should broadly deliver economic and social benefits but may have several adverse environmental impacts, although these may be mitigated through measures such as sustainable use of resources in construction and energy generation, as well as citing in highly accessible locations
2	Accepted in part – SA of Option 2 shows it could offer more positive impacts against the range of sustainability objectives, but its economic contribution is difficult to assess as the nature and potential of smart growth is not yet clear
Environment - Design Quality	
1	Rejected – doesn’t perform poorly against SA or Plan Objectives but doesn’t have the potential of Option 2 for ensuring government policy and best practice are implemented, furthermore it doesn’t raise the profile of design emphasising the critical importance of good design in the planning process
2	Accepted – assessment against SA and Plan Objectives shows this option has the greater potential to ensure design quality properly responds to the district’s environmental character

Environment - Biodiversity and Greenspace		
1		Rejected - The option is limited to improvements where development is proposed and does not as such take a strategic overview of greenspace provision in the District or of the multifunctional nature that greenspace can offer through its ability to mitigate flooding, provide land for sustainable drainage and provide wildlife corridors to support and enhance biodiversity
2		Accepted – option would allow a more proactive approach to provision of greenspace and conservation and enhancement of biodiversity. The option allows for the elaboration of the idea of areas of strategic opportunity as identified in the SE Plan. The development of a green network across the District is considered important helping to protect wildlife from the potential impact of climate change. SA and Plan Objective assessment supports this option
Environment - Sustainable Resource Management		
1		Undetermined – assessment against the Sustainability Objectives has shown Option 1 promotes sustainable resource management in line with the Government's objective for sustainable communities. Beneficial impacts as identified will become greater over time as the Government raises the standards to be met and introduces a mandatory level of the Code for Sustainable Homes (consultation on both options to inform decision)
2		Undetermined - the SA has shown that option 2 aims to place the District at the forefront of sustainable resource management, it would ensure better resource management in rural areas and would particularly allow for tighter control over greenfield and AONB sites. Consideration of these options against the Plan Objectives has shown that Option 2 has the greater potential to meet the objectives – particularly minimising emissions and making efficient use of resources though more research is required to determine viability of various sites in the District
Transport		
1	Accepted	Option 1 would contribute to strategic transport infrastructure and services, the longer-term prosperity of the area, key improvements and reducing the relative peripherality of the District. However, this should not detract, or distract, from local priorities (Option 2) for improved access to local jobs, shops, education and healthcare, and for the opportunities for this by sustainable transport modes
2	Accepted	

- 1.2.2 The options were also considered with regard to the Core Strategy Vision and Objectives and both this and the SA helped to inform the development of the Strategies for each of the above mentioned areas, which will in turn guide the development of the Core Strategy Policies.

Summary of the Likely Significant Effects of the Strategies

- 1.2.3 Table 1.2 below summarises the assessment of the potentially significant effects of the Plan Strategies on the SA Objectives. The SA Objectives are in bold and italics. (The Plan Strategies and the detailed appraisal of them can be found in Appendix 5 and 6 respectively.)
- 1.2.4 It is worth noting that the detail of how the strategies will be delivered, documented in the Core Strategy as: *'this will be achieved by'*, has not been assessed at this stage, just the higher level strategy. The detail, which in turn will develop into policy, will be assessed at the next stage once the strategies have been finalised in light of consultation feedback and any further evidence studies.

Table 1.2 *Summary of likely significant effects*

<ul style="list-style-type: none"> • <i>Ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home</i> <p>The significant effects on this SA Objective are beneficial and will potentially be from the Distribution of Development, Bexhill, Battle, Rye, Rural Areas and Communities Strategies.</p>
<ul style="list-style-type: none"> • <i>Improve the health and well-being of the population and reduce inequalities in health</i> <p>Potential for the most significant beneficial effects on this Objective will be from the Distribution of Development, Bexhill and Communities Strategies. The reason for this is largely connected to the links between good quality, affordable housing and health and well-being.</p>
<ul style="list-style-type: none"> • <i>Reduce crime and the fear of crime</i> <p>This SA Objective is mainly affected by the Communities Strategy, which promotes working with partner authorities to address issues of crime and disorder and should help lead to significant beneficial effects for reducing crime and the fear of crime.</p>
<ul style="list-style-type: none"> • <i>Reduce deprivation and social exclusion</i> <p>Significant beneficial effects on reducing deprivation and social exclusion should be experienced as a result of the implementation of the Strategy for Economy and all the spatial strategies. Particularly the Strategy for Bexhill with its focus on providing additional employment opportunities, further education facilities, housing for younger people and support for older people and the focus of the Rye Strategy on improving local social and economic conditions should significantly contribute to this SA Objective.</p>

<ul style="list-style-type: none"> • <i>Raise educational achievement levels and develop the opportunities for lifelong learning</i> <p>The Strategy with potential for significant beneficial effects for raising educational attainment is the Strategy for Economy, which requires action in increasing workforce skills through investment in education and through extended vocational training. The Strategies for Rye and Bexhill also have a strong focus on improving educational opportunities including new learning facilities and initiatives.</p>
<ul style="list-style-type: none"> • <i>Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities</i> <p>Collectively, the Strategies within the Core Strategy have a strong economic focus, as directed by the South East Plan in order to raise the economic profile of the region and particularly to deliver economic regeneration to this part of the Sussex Coast Sub-Region.</p>
<ul style="list-style-type: none"> • <i>Improve accessibility to services and facilities for all ages across the District</i> <p>Potential for the most significant beneficial effects on improving accessibility within the District is from the Bexhill, Battle, Rural Areas and Transport Strategies. Other strategies including that for Rye and the general Distribution Strategy should have beneficial effects but are not judged to be as significant.</p>
<ul style="list-style-type: none"> • <i>Encourage and facilitate increased engagement in cultural and leisure activities</i> <p>The Strategy for Battle has been judged to give rise to significant beneficial effects for increased engagement in cultural and leisure activities. A number of the strategies have been assessed as having more minor beneficial effects which cumulatively could have more significant effects.</p>
<ul style="list-style-type: none"> • <i>Improve efficiency in land use and encourage the prudent use of natural resources</i> <p>There is a level of uncertainty in predicting the effects of the strategies on the prudent use of natural resources due to actual locations for development linked to certain strategies (including Rye and the Economy) not having been determined at this stage.</p> <p>The general strategy for the Distribution of Development has clear direction for making the most effective and efficient use of land, prioritising previously developed land; however the significance of beneficial effects may reduce over time as previously developed land and infill opportunities become scarcer.</p>

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

There is a clear direction in the Strategy for Battle to reduce congestion and cross- town traffic movements, which should improve air quality in the town centre. The development of a wide-ranging integrated transport strategy for Bexhill that maximises accessibility both within the town and between the town and neighbouring Hastings should contribute to significant beneficial effects in the long term.

The Strategy for Transport and Accessibility has been judged to have minor beneficial effect for this SA Objective in the short to medium term with beneficial effects becoming more significant over time.

The encouragement of new enterprise and business into the District through the Economy Strategy and its facilitation of growth of 'home-grown' businesses are likely to put more pressure on the road transport system and increase traffic movements within the District.

- ***Reduce emissions of Greenhouse gases***

An increase in the number of households and businesses in the District has the potential for a significant adverse effect on reducing greenhouse gas emissions. Other areas of policy (cross-cutting) will help to ensure sustainable construction which should help to limit the generation of new greenhouse gas emissions.

- ***Minimise the risk of flooding and resulting detriment to people and property***

There are uncertainties for the effects on this SA Objective linked to the Strategies for Rye and the Economy. The Strategy for the Environment should produce significant beneficial effects for this SA Objective.

- ***Maintain, improve and manage water resources in a sustainable way***

Potential for adverse effects on the management of water resources with the amount of development proposed by the Bexhill Strategy and the subsequent demand on water supply. The sustainable management of water is fundamental in achieving sustainable development and the Strategy for the Environment aims to minimise water use, to provide water supply in a sustainable way and to ensure efficient sustainable wastewater infrastructure. The element of the Strategy for Environment that addresses water supply and wastewater should help to mitigate the adverse impacts on this SA Objective from other strategies.

- ***Conserve and enhance biodiversity***

Overall quantities of development proposed by the South East Plan for the District are likely to result in a net loss of biodiversity. This is because inevitably there will be development other than redevelopment and infill, which may require substantial greenfield land take over the Plan period. The Strategy for the Environment seeks to reduce negative effects on biodiversity by protecting priority habitats, identifying a greenspace network and proposing mitigation for significant losses.

- ***Protect and enhance the high quality natural and built environment***

The effects of the Plan Strategies on this SA Objective are generally beneficial. The Strategy for the Environment leads with the management of the high quality built and natural landscape character and seeks to place high quality design centrally in the planning process.

- ***Reduce waste generation and disposal, and achieve the sustainable management of waste***

Even with the highest levels of sustainable construction and most effective development distribution patterns the level of development proposed will ultimately result in increased numbers of households and businesses and consequently increased waste generation.

1.2.5 Where appropriate, measures designed to offset negative effects of the Strategies (mitigation measures) have been proposed and can be viewed in Table 7.1 of the Initial SA Report. These measures will be further considered and evaluated for implementation during the public consultation on the Strategy Directions Document for the Core Strategy DPD and the Initial SA Report.

1.2.6 A Sustainability Appraisal Monitoring Framework will monitor the performance of the final policies and the surrounding environment identifying key challenges and opportunities, which will enable adjustments and revisions to be made if necessary. The Monitoring Framework has been produced and will be consulted upon as part of the SA process before the Core Strategy DPD is adopted as policy. Monitoring helps to verify whether policies are achieving their objectives particularly concerning sustainable development or whether they may have had unintended consequences.

1.3 Statement on the difference the process has made

1.3.1 The SA process has investigated the likely significant environmental and sustainability impacts of the options and strategies presented in the Core Strategy Directions Consultation Document. A range of impacts has been identified. The assessment has therefore provided an initial check on the sustainability of the Options and Strategies as envisaged by government guidance. The SA process has highlighted where options may be ambiguous or in themselves insufficient and this has led to clarification and careful rewording to improve them from a sustainability perspective.

1.3.2 The SA process has been influential in informing the development of the Core Strategy. The iterative nature of the process of developing the Core Strategy has allowed the SA to input at various stages and highlight how the Plan can be made more sustainable. This process

will continue as the Core Strategy is taken through the next stage and prepared for examination in public. The Council will consider further the proposed mitigation measures put forward in this report during this period of consultation.

- 1.3.3 The ultimate effectiveness of the DPD from the perspective of sustainable development will depend on an effective partnership between Rother District Council, prospective developers, infrastructure providers and the community at large.

1.4 How to Comment on the report

- 1.4.1 To comment on this report please use the Comments Form for the 'Consultation on Strategy Directions'. This is available on the Council's website at www.rother.gov.uk/corestrategy.
- 1.4.2 If possible please complete this online, as this will help the Council efficiently administer the consultation. Please visit the website for step-by-step instructions.
- 1.4.3 For further enquiries please contact Senior Planning Officer **Tondra Thom** on **01424 787637** or email tondra.thom@rother.gov.uk.

2 INTRODUCTION

2.1 Purpose of SA and SA Report

- 2.1.1 Under the Planning and Compulsory Purchase Act 2004, Sustainability Appraisal (SA) is mandatory for DPDs. The purpose of SA is to promote sustainable development through better integration of sustainability considerations into the preparation and adoption of plans. SA is an integral part of good plan making and should not be seen as a separate activity. It is an iterative process that identifies and reports on the likely significant effects of the plan and the extent to which implementation of the plan will achieve the social, environmental and economic objectives by which sustainable development can be defined.

2.2 Compliance with SEA Directive/Regulations

- 2.2.1 In summer 2001, the European Union legislated for Strategic Environmental Assessment (SEA) with the adoption of Directive 2001/42/EC on the Assessment of the Effects of Certain Plans and Programmes on the Environment (the 'SEA Directive'). The Directive applies to a range of UK plans and programmes, including DPDs.
- 2.2.2 The SEA Directive calls for an Environmental Report "identifying, describing and evaluating the likely significant environmental effects of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme".
- 2.2.3 Government Guidance¹ is intended to integrate the requirements of the SEA Directive into the SA process. To comply with the Directive, authorities are obliged to report on the environmental impacts of various alternatives considered before the plan is adopted, and the guidance calls for the SA Report to incorporate the elements of Environmental Report required by the Directive.
- 2.2.4 The SEA Regulations set out a legal assessment process that must be followed. In light of this, Table 2.1 sets out the relevant requirements of the SEA Regulations and explains how these have been satisfied (or will be satisfied). In particular, the SEA Regulations require the preparation of an 'Environmental Report' on the implications of the plan or programme in question. This report fulfils this requirement.

¹ ODPM Guidance: Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents Guidance for Regional Planning Bodies and Local Planning Authorities November 2005

Table 2.1 SEA Directive Requirements

Requirement	Where met
Contents and main objectives of plans and programmes that may affect the plan	Ch 3 (and Scoping Report)
Relevant aspects of the current state of the environment and its likely evolution without the implementation of the plan	Ch 3 (3.3) (and Scoping Report)
The environmental characteristics of the areas likely to be significantly affected	Ch 3 (3.3) (and Scoping Report)
Any existing environmental problems (issues) in particular those relating to areas designated under the Habitats and Birds Directives	Ch 3 (and Scoping Report) 3.3; 3.6; 3.7
The environmental protection objectives which are relevant to the plan or programme, and the way those objectives have been taken into account in its preparation	(Scoping Report Context Review) Ch 3 Ch 6
The likely significant effects on the environment (and economic and social impacts)	Ch 6
The measures envisaged to prevent, reduce and as fully as possible offset any significant effects on the environment	Ch 7
An outline of the reasons for selecting the alternatives dealt with	Ch 5 (5.5)
A description of how the assessment was undertaken, any problems, etc.	Ch 3 (3.4) Ch 4 and Ch 7
A description of the measures envisaged concerning monitoring	Ch 8 (8.3)

2.3 Plan objectives and outline of contents

2.3.1 The Core Strategy DPD of the LDF sets out the overall approach which the Council, working with its partners in the local and regional community, will use to guide and control the future use and development of land to improve and protect the District's environment.

2.3.2 The Core Strategy spatial vision is presented in the following box:

Vision for Rother in 2026

Rother District will be recognised for its high quality of life where there is a strong emphasis on community life. This will have been achieved by continuing to support, and further develop, vibrant, safe, balanced and inclusive communities.

Sustainable economic growth will have been secured, with much improved job opportunities, and which encourages young people to stay in the area and provides greater prosperity for all.

Improved economic and social well-being will be facilitated by better access to jobs and services for all ages, in both urban and rural areas, and improved connectivity with the rest of the region.

The area's outstanding environmental and cultural assets will continue to be highly valued and conserved. Sensitive stewardship of environmental resources will be integral to a local commitment to a more sustainable future and a responsible, positive approach to helping address climate change issues.

Development and change will have contributed significantly to meeting local needs and aspirations. It will have responded positively to the area's particular local circumstances and environmental resources, as well as according with the South East Plan.

Bexhill will have retained and strengthened its distinct identity and become one of the most attractive places to live on the south coast - attractive to families, the young and older people alike. As the main focus of development in the district, it will be playing its part within an integrated approach to securing a more prosperous future for the Bexhill and Hastings area.

Battle continues to be a thriving small market town and tourist centre which retains its essential character, with sensitive conservation of its historic core and setting.

Rye has improved economic and social circumstances with a stronger and more sustainable market town role, tourism sector and Port. This will have been achieved whilst fully respecting and sensitively managing its historic character, vulnerability to flooding and ecologically important setting.

Rural areas of the district will have evolved "organically" in a manner sensitive to their essential character, diversity and relationship with their surroundings. Villages will be vibrant and inclusive, while the countryside will be economically active, accessible and well-managed.

2.3.3 The spatial and strategic objectives are detailed below. It is important to note that the Plan Objectives are referred to as Aims in the Core Strategy Document. They are labelled numerically in the SA using the code SO for Spatial Objectives and CO for Cross-cutting Objectives this is to facilitate the presentation of the assessment matrices documented later in the report.

Strategic Spatial Objectives

- **SO1** To achieve a pattern of activity and development that responds positively to the South East Plan and the area's particular local circumstances and environmental resources in contributing to the Community Strategy and the Spatial Vision
- **SO2** To strengthen the identity of Bexhill and for it to become one of the most attractive places to live on the south coast, attractive to families, the young and elderly alike, within an integrated approach to securing a more prosperous future for the Bexhill and Hastings area
- **SO3** To support the market town and tourist centre role and character of Battle and conserve its historic core and setting
- **SO4** To improve the economic and social well-being of Rye, including in relation to its market town role, tourism and the Port of Rye, whilst fully respecting and sensitively managing its historic character, vulnerability to flooding and ecologically important setting
- **SO5** to meet local needs and promote vital, viable and support vibrant, mixed communities in the rural areas whilst giving particular attention to the economic, ecological, public enjoyment and intrinsic value of the countryside
- **SO6** To secure a more prosperous future for the Hastings and Bexhill area. Economic regeneration and growth will be generated through joined up working concentrating on:
 - a) the provision of high quality education opportunities, skills training and economic development
 - b) social regeneration
 - c) strategic physical and environmental projects and programmes

Strategic cross-cutting objectives

- **CO1** To continue to support, and further develop, vibrant, safe, balanced and inclusive communities
- **CO2** To maintain the high quality and improve the long term stewardship of the natural and built environment, with full regard to potential future consequences of climate change
- **CO3** To secure sustainable economic growth for existing and future residents, and provide greater prosperity for all

- **CO4** To provide a higher level of access to jobs and services for all ages in both urban and rural areas and improve connectivity with the rest of the region
- **CO5** To ensure that the Strategy is robust in terms of ensuring effective and timely delivery of development and infrastructure

3 SUSTAINABILITY BACKGROUND

3.1 Introduction

- 3.1.1 This chapter discusses the sustainability background for the District using the evidence gathered through the first stage of the SA process. The scope of the SA is defined in the stakeholders' consultation document, the SA Scoping Report. This set out the context and objectives for the SA, collected baseline data and identified key issues / problems for the District.
- 3.1.2 An updated second revision of the scoping report was issued to the statutory consultees in December 2007. The purpose of the second revision was to improve conformity with the SEA Directive and generally update the document in light of new government policy. During the updating of this Scoping Report, the SA Framework was revised in line with SA Guidance to ensure that the number of sustainability objectives is manageable in view of its intended purpose to appraise the Core Strategy. This will be explained further in Chapter 4 Appraisal Methodology.
- 3.1.3 This chapter, in compliance with the SEA Regulations, details the current state of the environment as identified in the Scoping Report. This includes a description of the current environment in the District and suggests the likely future state without the implementation of the DPD and identifies the sustainability issues / problems for the District.

3.2 Links to other strategies, plans and programmes and sustainability objectives

- 3.2.1 Links with other plans and programmes are given in the SA Scoping Report for the Rother Local Development Framework². Since the second revision of the Scoping Report the Government has published a new PPS12 called *Creating strong, safe and prosperous communities through Local Spatial Planning* and amended the Local Development Regulations: The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008. Summaries of the changes as reported on the Planning Inspectorate website³ are given below:

PPS12 Local Spatial Planning:

- It has been significantly reduced in length from the previous PPS12, and concentrates on the key policy framework

² The Scoping Report for the Rother Local Development Framework is available upon request from the Council

³ <http://www.planning-inspectorate.gov.uk>

- Emphasising the key role the Core Strategy plays, its links to the Sustainable Community Strategy and the need for corporate support, from the Chief Executive and key Members
- It Emphasises the need for making progress with LDFs to assist in the delivery of key Government and Council priorities (including housing delivery, and any targets identified in the Local Area Agreement)
- It gives local authorities more flexibility to determine what documents they will produce, and what process they will adopt in taking the documents from initial stages to adoption
- Putting more emphasis on forward looking infrastructure planning
- Repackaging the tests of soundness to give greater clarity whilst not altering the basis for examination of plans, this places the focus on justification (evidence) and effectiveness (deliverability) of the strategy.

The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008

- These regulations put in place the proposals made in the Planning White Paper last year to help streamline the local development framework process. They came into force on 27 June 2008.
- Key changes include:
 - Improved consultation arrangements – reducing the number of formal stages while giving the public more opportunity to get involved at the beginning of the process by ensuring better links between the Sustainable Community Strategy and the Core Strategy
 - Revisions to the procedure of plan making – moving the point where the plan is submitted to the independent Inspector so that representations made on the final consultation can be taken into account before submission.

3.3 Description of the social, environmental and economic baseline characteristics and the predicted future baseline

3.3.1 The description of the social, environmental and economic baseline characteristics and the predicted future baseline can be found in Section 3 of the SA Scoping Report. The council will periodically update this information as new statistics and data become available.

3.3.2 A summary overview of the main characteristics is presented below:

Location and Geography

3.3.3 For the greater part, Rother is rural in character, forming the south-eastern part of the High Weald. However, it also embraces low-lying coastal areas at both the eastern and western ends of the District.

- 3.3.4 The settlement pattern reflects this spatial variation, with most of the larger settlements on or close to the coast. Bexhill accounts for nearly half of the population, with the other, much smaller, historic towns being Battle and Rye. Many jobs and key services are provided by larger towns – notably Hastings – outside the District. This means that close regard should be had to planning and service delivery across administrative boundaries.

People – socio-economic characteristics

- 3.3.5 Some 87,200 people live in Rother. Their age structure shows a notably higher proportion of elderly compared to county, regional and national averages. This also varies across the District, with the highest proportion of people aged 65+ in Bexhill (35%) and at Fairlight (40%).
- 3.3.6 There are no sizeable ethnic minority groups in the District.
- 3.3.7 Average household income, which is an indicator of spending power, is relatively low in Rother, being below the county average and well below the regional average. This may partly reflect the high proportion of retired residents.
- 3.3.8 The Government's most recent (2004) compilation of indices of social-economic characteristics, the Index of Multiple Deprivation' (IMD) ranks Rother 181st "worst" of 354 local authority areas. In other words, it is a little above the national average, but there are still pockets of deprivation. In contrast, Hastings is ranked 39th most deprived district in the country.
- 3.3.9 Rother is a relatively safe place to live, with noticeably lower levels of criminal offences than both the region and country as a whole.

Education, skills and employment

- 3.3.10 Educational achievement, at GCSE level, of local students is relatively high in both East Sussex and regional contexts. However there is a lower proportion of people with a degree (17.7%) compared to the south-east region's average of 21.7%, which suggests a drift of away from the area by degree-qualified people.
- 3.3.11 This is also reflected in the types of jobs people do, with fewer than the national average in managerial and professional posts, although higher levels are found in some rural areas, notably those with closer links to Tunbridge Wells and London.
- 3.3.12 Some 23,200 people are employed in Rother. This compares with a total workforce of 33,800, meaning that there is a net out-flow of commuters. In fact, some 40% of Rother residents work outside the district.

- 3.3.13 The rationale for this is evidenced by the difference between average earnings of residents (£502) and people working in Rother (£411).
- 3.3.14 Of the jobs in Rother, the most significant sectors are public services followed by financial and business services and retail/distribution. About 10% of jobs are in manufacturing and 3.3% in agriculture/forestry/fishing.
- 3.3.15 Smaller firms (10 or less employees) predominate, accounting for 89% of business units. Not untypical for a rural area, there are many self-employed people.
- 3.3.16 Unemployment rates (measured by benefit claimants) are currently low, broadly comparable with the wider area. However, this has not always been the case and in the early 1990s the eastern part of the District and parts of Bexhill were very much higher than the regional average.

Housing

- 3.3.17 The total number of households in Rother is 38,800, giving an average household size of 2.2 persons, notably lower than the region or country. This is attributable to the fact that single person households account for one third of the total. The proportion is generally higher in coastal parishes.
- 3.3.18 In 2001 the large majority of homes (78%) were owner-occupied, with 10.6% social rented, 8.0% private rented and 3.5% other rented. This compares to 79% in 1991. Compared to the region as a whole (74%), it is higher.
- 3.3.19 The District has one of the highest ratios of average house prices to earnings in the South East (East Sussex in Figures) and has increased over the last 5 years. This fuels the substantial affordable housing need across the District.
- 3.3.20 House-building since 1991 has averaged 229 dwellings per year. Most of this has actually been in the rural areas, although present plans should shift the balance towards the towns and especially Bexhill.

Environment

- 3.3.21 Rother has outstanding environmental qualities in its landscape, wildlife habitats, built and cultural heritage. There are ongoing national and international obligations to conserve and enhance these. Furthermore, they are integral to the character of the area.

- 3.3.22 The state of the environment is generally good but there are pressures upon it. The High Weald is subject to continuing financial pressures on agriculture and land management, as well as from development.
- 3.3.23 Parts of the SSSIs in the District are defined as in “unfavourable condition”; river water quality is virtually all “fairly good” – “very good” but abstraction is increasing. All Rother’s beaches meet EC Directive on bathing water quality, although only Winchelsea Beach meets its more stringent guideline standard.

Future trends under the ‘business as usual’ option as identified in the LDF SA Scoping Report:

- House buildings rates will continue to fall short of Structure Plan targets
- House prices could continue to rise faster than local incomes
- The mix and type of housing may not necessarily be that required by the local population
- With climate change there is the potential for increased surface run-off from the High Weald causing floods and impacts on the coastal areas from storms
- Decline in the business base locally as there is not a high proportion of companies in growth sectors
- Infrastructure particularly water and road infrastructure will continue to give rise for concern
- An increase in home working in the District
- Proportion of working age adults in the population is set to decline

3.4 Difficulties in collecting data and limitations of the data

- 3.4.1 The SA/SEA guidance recognises that it may be necessary to revisit the baseline data, to keep the information up-to-date and to identify new information and issues as they emerge. In light of this a new baseline table has been prepared (Appendix 2 of the Scoping Report) in line with the indicators proposed in the SA Framework. This table will be periodically updated and used to update the environmental baseline and sustainability issues at appropriate intervals in the LDF programme.
- 3.4.2 Inevitably there are gaps in data provision. Key areas / topics / indicators for which data for Rother is currently lacking are summarised in Table 3.1 below.

Table 3.1 Indicators for which data for Rother has not been found

Education	Social Issues
County comparator for the percentage of students 16+ in full time education	County comparator for the number of households in fuel poverty
Business & Employment	Accessibility
County comparator for the loss of employment land to residential	County comparator for % completed retail, office, leisure development in town centres County comparator for % new development within 30 minutes public transport
Travel	Flooding
Background levels of main air quality pollutants	County comparator for properties at risk from flooding and planning permissions granted contrary to EA advice
Natural Resources	Greenhouse Gas Emissions
County comparator for vacant private sector dwellings returned to occupancy	% new development with renewable energy generation Applications received for renewable energy on existing development

3.5 Main social, environmental and economic issues and problems identified

3.5.1 The key sustainability issues are identified in the SA Scoping Report. Table 3.2 provides a summary of these issues.

Table 3.2 Key Sustainability Problems

Sustainability Issue	Supporting Evidence
Environment	
Waste & Recycling	<ul style="list-style-type: none"> • Rother Community Plan priority to reduce the amount of waste going to landfill • National recycling targets • PPS10 Planning for Sustainable Waste Management; • East Sussex and Brighton and Hove Waste Local Plan
Maintaining Landscape Quality	<ul style="list-style-type: none"> • Community Strategy for East Sussex priority • High Weald AONB Management Plan; Rother Local Plan • The Historic Environment: A Force for our Future
Sustaining Biodiversity	<ul style="list-style-type: none"> • PPS9 Biodiversity and Geological Conservation • Rother Environmental Policy Statement

	<ul style="list-style-type: none"> • Biodiversity Action Plan for Sussex
Preserving Historic and Built Environment Quality	<ul style="list-style-type: none"> • Rye, Battle, Winchelsea, Sedlescombe, Bexhill Conservation Area Appraisals • PPG15 Planning and the Historic Environment • The Historic Environment: A Force for our Future
Climate Change	<ul style="list-style-type: none"> • Community Strategy for East Sussex priority • PPS1 Creating Sustainable Communities and the new Supplement to PPS1; PPS25 Development & Flood risk • Strategy for Energy Efficiency and Renewable Energy
Water Quality	<ul style="list-style-type: none"> • Water Framework Directive • PPS23 Planning and Pollution Control • Rother Environmental Policy Statement • Bathing quality at beaches
Air Quality	<ul style="list-style-type: none"> • UK Air Quality Strategy • PPS23 Planning & Pollution Control • Rother Environmental Policy • Mode of travel to work – high car use
Social	
Community Safety	<ul style="list-style-type: none"> • Integrated Sustainable Community Strategy for East Sussex • Rother Crime and Disorder Reduction Strategy • PPG13 Transport
Children & Young People	<ul style="list-style-type: none"> • PPG17 Planning for Open Space, Sport & Recreation • Sussex Learning & Skills Council Annual Plan • Integrated Sustainable Community Strategy for East Sussex
Culture & Leisure	<ul style="list-style-type: none"> • PPG17 Planning for Open Space, Sport & Recreation • Tourism and Related Sport Recreation • Rother Cultural and Leisure Strategy • Satisfaction with theatres and galleries
Health	<ul style="list-style-type: none"> • The Bexhill and Rother Health Improvement Action Plan • Population within 20 minutes of sports facility • Integrated Sustainable Community Strategy for East Sussex • Rother Local Plan
Housing	<ul style="list-style-type: none"> • Rother Housing Strategy • Rother Local Plan • Draft South East Plan; PPS3 Housing • Property price to earnings ratio
Transport & Accessibility	<ul style="list-style-type: none"> • PPG13 Transport • Regional Transport Strategy • Integrated Sustainable Community Strategy for East Sussex • All accessibility indicators
Deprivation	<ul style="list-style-type: none"> • South East Regional Inclusion Statement

	<ul style="list-style-type: none"> • Draft South East Plan • Rother Economic Regeneration Strategy • Indices of multiple deprivation • % households in fuel poverty • Mean household income
Economic	
Education & Skills	<ul style="list-style-type: none"> • Sussex Learning & Skills Council Annual Plan • Draft South East Plan • Integrated Sustainable Community Strategy for East Sussex • All education baseline indicators
Jobs	<ul style="list-style-type: none"> • Rother Economic Regeneration Strategy • Hastings & Bexhill Area Investment Framework Annual Performance Plan • Draft South East Plan
Local Economy & Regeneration	<ul style="list-style-type: none"> • Rother Economic Regeneration Strategy • Hastings & Bexhill Area Investment Framework Annual Performance Plan • Draft South East Plan • All economic indicators

3.6 Appropriate Assessment

3.6.1 The Council, as the relevant competent authority, has carried out the first stage of Appropriate Assessment (AA) of the Core Strategy Development Plan Document in accordance with the Habitats Directive.

3.6.2 The Assessment provides a screening to examine whether the Core Strategy is likely to have any significant impacts on European designated conservation sites, either alone or in combination with other projects and plans, in view of the European site's conservation objectives. The Assessment:

- Provides details of the Plan and its proposals
- Identifies European sites within and outside the Plan area that may potentially be affected by the Core Strategy
- Identifies the characteristics of these European sites and their conservation objectives
- Identifies whether the Core Strategy, alone or in combination with other relevant plans or projects is likely to have a significant impact on the European sites

3.6.3 The Assessment has been undertaken following a precautionary approach in accordance with the Habitats Directive and examines all European sites within the District boundary and within 15km of the District boundary.

3.6.4 The following potential impacts have been identified and trigger the requirement to proceed to the next stage of Appropriate Assessment:

- Dungeness SAC:
 - Potential for impacts from housing provision and associated infrastructure on water quality and quantity that could affect the integrity of the site
 - Potential for impacts on species that forage outside the site's boundary
 - Potential for increased recreational pressure and disturbance that could affect the integrity of the site
 - Potential for changes in pollution levels from increased traffic levels related to housing provision and associated infrastructure
- Dungeness to Pett Level SPA and proposed Ramsar Site:
 - Potential for impacts from housing provision and associated infrastructure on water quality and quantity that could affect the integrity of the site
 - Potential for impacts on species that forage outside the site's boundary
 - Potential for increased recreational pressure and disturbance that could affect the integrity of the site
 - Potential for changes in pollution levels from increased traffic levels related to housing provision and associated infrastructure
- Pevensey Levels Ramsar Site :
 - Potential for impacts from housing provision and associated infrastructure on water quality and quantity that could affect the integrity of the site
 - Potential for changes in pollution levels from increased traffic levels related to housing provision and associated infrastructure
- Hastings Cliffs SAC:
 - Potential for increased recreational pressure and disturbance that could affect the integrity of the site

3.6.5 Natural England is the principal consultee for the Appropriate Assessment of the Core Strategy, they were consulted in February 2008 and their recommendations incorporated into the Screening Report.

3.6.6 The next stages of the AA, the assessment and the assessment of alternative solutions require ecological expertise. The Council does not have this expertise in house and is currently considering sharing resources across authorities, to look at the 'in combination' effects on sites.

3.6.7 The AA is to be undertaken later this year and will inform the Core Strategy as it develops and will be available for viewing alongside the pre-Submission DPD.

3.6.8 The Screening Report for the AA is available to view upon request from the Council.

3.7 Strategic Flood Risk Assessment

3.7.1 The purpose of an SFRA is to provide the Local Planning Authority with a tool that will assist in identifying the level of flood risk in the District, to better inform planning decisions.

3.7.2 Under the provisions of PPS25: Development and Flood Risk (together with its Practice Guide Companion), local authorities are required to undertake an SFRA and to use that SFRA to inform the Sustainability Appraisal of the Council's Local Development Framework.

3.7.3 The Level 1 SFRA has been completed by the Council and verified by independent consultants. The SFRA has provided useful baseline information for the SA and the flood zone mapping has been used to inform the assessment of the options.

3.7.4 The main sources of flooding are fluvial flooding along the River Rother (Robertsbridge and Etchingham), a combination of fluvial and tidal flooding in the lower catchment and in the Marshes and tidal flooding along the coast.

3.7.5 Some built up parts of Rother are susceptible to flooding caused by poor surface water drainage. This may be caused by a high water table. High tides and high river levels can influence the height of the water tables.

3.7.6 The Level 2 SFRA is underway and will be applied to the following areas:

- | | |
|--------------------------------------|--|
| • Camber | existing development boundary wholly in FRA |
| • Rye Harbour | existing development boundary wholly in FRA |
| • Winchelsea Beach | existing development boundary wholly in FRA |
| • Pett Level and Marsham Flatlands | existing development boundary wholly in FRA |
| • Normans Bay | existing development boundary partially in FRA |
| • Rye (Dry Island) | existing development boundary partially in FRA |
| • Winchelsea (Dry Island) | existing development boundary partially in FRA |
| • Robertsbridge & Northbridge Street | existing development boundary partially in FRA |
| • Etchingham | existing development boundary partially in FRA |

- Crowhurst existing development boundary partially in FRA
- Bodiam village in countryside but wholly in FRA
- Jurys Gap settlement in countryside but wholly in FRA
- East Guldeford settlement in countryside but wholly in FRA

3.7.7 Level 2 SFRA will not be required for Bexhill as it is proposed that the strategic growth area (and any other proposed development) will avoid flood Zones 2 and 3.

3.7.8 The Level 1 SFRA will be made available to view at the Council's website www.rother.gov.uk in due course. Further work on Level 2 and applying the sequential and exception tests in accordance with PPS25 is ongoing and will continue to inform the development of the Core Strategy DPD.

3.7.9 The SFRA will also be fundamental in preparing the Site Allocations DPD and informing the Sustainability Appraisal of that DPD. By this stage site boundaries will be known and detailed information on flood risk will be crucial. The allocation of sites must reflect application of the Sequential Test, and where necessary the Exception Test, with reasoned justifications provided for any decision to allocate land in areas at high risk.

3.7.10 The Core Strategy LDD should include clear, strategic and robust policies for the management of flood risk within the local authority area taking climate change into account. The emerging policy recommendations from the draft Level 2 SFRA are as follows:

Flood Defence

- The SFRA process has highlighted the importance of flood defences throughout Rother district. Future policy should seek to address how these defences are to be maintained to ensure that they are maintained to the current high level of protection.
- Review the condition of existing local defences, the dependence of additional local development on them for flood mitigation and where necessary the Council should seek to maintain and or improve defences if necessary.
- Where necessary and achievable adopt a policy for the routine maintenance of all watercourses ensuring they are clear of debris that could affect flood flow conveyance.

Flood Mitigation

- Mitigate flood risk from developments through development of flood storage schemes which will also provide amenity benefit.

- The Council should ensure new developments in these areas undertake a site investigation to determine the risks from groundwater flooding and incorporate mitigation measures into the design of any buildings to prevent flood damage from this source.
- Surface water flooding should be investigated in detail as part of FRAs for all developments, and comprehensive surface water runoff calculations undertaken.
- Require all flood risk assessment and sustainable drainage design to consider the impacts of climate change for the lifetime of the development at the site and downstream.
- Ensure discharge rates from new developments do not increase following redevelopment, including an allowance for climate change and preferably restrict discharge rates to greenfield runoff rates in areas known to have a history of sewer flooding.

Development Control

- If development is to be constructed with less vulnerable uses on the ground level, agreements need to be in place to prevent future alteration of these areas to 'more vulnerable' uses without further study into flood risk.
- Single storey residential development should not normally be considered in flood risk areas as they offer no opportunity for safe refuge areas on upper floors.
- Where a development is applying for a change of use flood evacuation plans should be developed through liaison with the emergency services.
- The Council should ensure new development in the area does not increase the burden on the existing drainage system either through restricting site discharge rates and/or through capital contributions to improvements works of the existing drainage infrastructure.
- Ensure that proposed developments can be accommodated by the existing infrastructure provision. Where a development cannot be met by current resources, ensure that the phasing of development is in tandem with infrastructure investment.

Environmental

- Consider the potential benefits an appropriately designed Sustainable Drainage System could have for the biodiversity, amenity value, water quality and resource value of a development and/or surrounding area.

- Consider the vulnerability and importance of local resources when determining the suitability of drainage strategies/SuDS.

3.8 Plan Objectives

- 3.8.1 The Core Strategy DPD objectives (as detailed in Chapter 2), which set out what the plan is aiming to achieve in spatial planning terms, set the context for development of the options for the DPD.
- 3.8.2 It is important that the DPD objectives are in accordance with sustainability principles, so they have been tested for compatibility against the SA Framework (Appendix 2). This is in compliance with the SA Guidance. The DPD objectives could not be tested during the initial scoping work as they had not at that stage been formulated.
- 3.8.3 As a result of the SA testing amendments were made to some objectives, or their component sub-objectives, so they could better address a wider range of SA Objectives. The changes are detailed below:

SO4 To improve the economic and social well-being of Rye, including in relation to its market town role, tourism and the Port of Rye, whilst fully respecting and sensitively managing its historic character, vulnerability to flooding and ecologically important setting

- 4.1 To provide high quality education and employment
- 4.2 To enhance sustainable tourism and leisure
- 4.3 To improve the availability of day to day goods and services
- 4.4 To secure investment (in community facilities and) in new and/or improved pedestrian and cycle routes linking residents to their facilities
- 4.5 To conserve and enhance the unique character and quality of the Citadel and its distinctive landscape setting
- 4.6 To protect and sensitively manage the high quality ecological and landscape resources
- 4.7 To continue to manage, and protect the community from, the risk of flooding
- 4.8 To enhance the character and amenities (including visitor amenities) of Rye Harbour

Changes:

- 4.1 To provide high quality education, employment **and housing**
- 4.4 Remove brackets from sentence

SO5 To promote and support an active, accessible and well managed countryside whilst having full regard to its protection and enhancement. To continue to promote vibrant, inclusive villages, and settlement groupings, that retain their essential character, diversity and relationship with their surroundings

- i) To recognise the individual distinctiveness of villages
- ii) To retain and enhance the rich cultural heritage of villages
- iii) To ensure viable and accessible rural services in villages
- iv) To be more inclusive, especially in terms of access to housing
- v) To support local employment opportunities
- vi) To ensure that new development helps meet local needs, enhances or supports local services and community facilities and is in harmony with its setting
- vii) To promote use of public transport to larger and neighbouring settlements
- viii) To promote environmentally sensitive land management
- ix) To respects and conserve the historic landscape mosaic, particularly in the High Weald AONB.
- x) To retain, support and better manage a diversity of natural habitats, including ancient woodland
- xi) To support agriculture and foster other land-based industries

Changes

Add: **To maintain and improve the social cohesion of villages**

Reorder sentences as follows:

SO5 To continue to promote vibrant, inclusive villages, and settlement groupings, that retain their essential character, diversity and relationship with their surroundings. To promote and support an active, accessible and well-managed countryside, whilst having full regard to its protection and enhancement.

4 APPRAISAL METHODOLOGY

4.1 Introduction

- 4.1.1 The chapter discusses the approach adopted to carry out the assessment stages of the SA, detailing the methods used in assessing the plan options at their various stages of development.

4.2 Approach to the SA

- 4.2.1 As a result of the Scoping exercise a SA Framework was devised for use as a tool in the assessment process. The SA Framework, as shown in Table 4.1, consists of Sustainability Objectives that reflect the specific priorities and needs of the District and therefore provides the methodology for identifying possible conflicts and suggesting solutions. The associated indicators are shown in Appendix 1.

Table 4.1 *The Sustainability Appraisal Framework*

Sustainability Appraisal Objectives
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 the 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

4.2.2 A series of decision-aiding questions or sub-objectives has been devised for each SA Objective in order to facilitate the appraisal process. The full SA Framework including the decision-aiding questions can be found in Appendix 1. An example of this is shown below:

Objective:

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

Decision-aiding questions:

Does the option/policy:

- Deliver affordable, sustainable housing in both urban and rural locations, in keeping with local character
- Support sympathetic accommodation of housing growth in sustainable locations
- Balance housing delivery with community facilities and environmental capacity
- Provide for an appropriate mix and range of housing

4.2.3 Each option 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

4.2.4 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.

4.2.5 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

4.2.6 The scoring criteria for completing the appraisal matrices is shown in Table 4.2 below:

Table 4.2 Sustainability Appraisal Scoring Criteria

Symbol	Likely effect against the SA Objective
✓	Potentially significant beneficial effect
(✓)	Option supports this objective though it may only have a minor effect
~	1. Policy has no effect 2. 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 and may result in minor adverse effects
X	Potentially significant adverse effect

4.2.7 The methodology used for assessing the cumulative and synergistic effects of the options is discussed below.

4.2.8 The cumulative effects, identified in the assessment of the Plan Strategies, are those that result from the interaction of all of the Strategies. Consequently, the adverse impacts of some Strategies on a particular SA Objective will be outweighed by the benefits of others. Synergistic effects can be described as those that are greater than the sum of the individual effects.

4.2.9 The symbols used are as follows:

Table 4.3 *Symbols for the Assessment of Cumulative & Synergistic Effects*

Symbol	Effect
✓	Beneficial Effect
(✓)	Beneficial Effect (but potential for mitigation)
?	Uncertain Effect (potentially beneficial)
~	No Effect
?	Uncertain Effect (potentially adverse)
(X)	Adverse Effect (but potential for mitigation)
X	Adverse Effect

4.2.10 Beneficial Effect indicates that in combination the Strategies will clearly help to achieve the SA Objective. Conversely Adverse Effect suggests that the Strategies overall work against the achievement of the SA Objective. Brackets indicate where one or more measures are proposed to mitigate adverse impacts or enhance beneficial impacts.

4.2.11 Some adverse effects are unavoidable: for instance, growth is expected in Rother which will place additional demands on water resources and will lead to more household waste being generated. It should be noted that this does not necessarily mean that water will be in short supply or that the Strategies do not include measures to encourage resource efficiency. Rather it indicates that, taken in isolation, the Strategies have certain adverse effects and measures will be required to deal with the problems identified.

4.3 When the SA was carried out

4.3.1 The SA Scoping Report was produced between June and August 2006 and underwent statutory consultation in August 2006. The updated SA Scoping Report was re-submitted for statutory consultation in December 2007. The SA of the options was carried out between February and April 2008. The SA of the Plan Strategies was conducted between June and August 2008.

4.4 Who carried out the SA

4.4.1 The SA was carried out by Planning Officers in the Planning Strategy and Environment section of Rother District Council.

4.5 Who was consulted, when and how?

4.5.1 The three statutory bodies (The Environment Agency, Natural England and English Heritage) were consulted upon the scope of the SA in August 2006 and between December 2007 and February 2008.

5 PLAN ISSUES AND OPTIONS

5.1 Introduction

- 5.1.1 The Council is required to plan for further development in the District and has the responsibility of preparing a new Local Development Framework (LDF) to guide change to 2026.
- 5.1.2 The Council aims to do this in a way that is guided by a vision for what Rother should be like in the future – one that reflects the needs and aspirations of local people and communities.
- 5.1.3 The first task in the process is to produce the Core Strategy document that will set the vision and general level and distribution of development within the District up to 2026.
- 5.1.4 The Council has the recently adopted Rother District Local Plan to guide development to 2011. The Core Strategy, by looking 20 years ahead, can take a long-term view of the direction of change, rather than simply meeting short to medium-term development requirements.
- 5.1.5 The Council produced a 'Core Strategy Issues and Options Discussion Document' in October 2006 which suggests broad development options to ensure the widest possible debate. This document was widely consulted upon between October and December 2006.
- 5.1.6 The generation of reasonable options is central to the preparation of DPDs and the appraisal of these options is a key part of the SA process.

5.2 Main strategic options considered and how they were identified

- 5.2.1 The options presented at the Core Strategy Issues and Options stage have been progressed in light of representations received and evidence based studies undertaken. Evidence based studies include the Rural Settlement Strategy; the Employment Land review; the Retail Assessment; Strategic Flood Risk Assessment, Viability Studies for Bexhill and Strategic Housing Land Availability Assessment, for example.
- 5.2.2 The options are presented in Appendix 3 in tables that include information on the central themes of the options, the main areas of change (where relevant), scale of growth (where relevant), the strategy emphasis and the strengths and weaknesses. This information has been used to inform the SA of the options.
- 5.2.3 Options have been developed for:

- The scale of growth
- The distribution of growth
- Bexhill
- Battle
- Rye
- Rural Areas
- Community
- Environment
- Economy
- Transport & Accessibility

5.3 Comparison of the social, environmental and economic effects of the options

- 5.3.1 A comparison of the social, environmental and economic effects of the options has been carried out and the full appraisal can be found in Appendix 4 of the Initial Sustainability Appraisal.

5.4 How social, environmental and economic issues were considered in choosing the Options to progress to Strategies.

- 5.4.1 The sections below summarise the assessment of the options. This assessment constitutes a thorough investigation of the options considering short, medium and long-term effects. Conformity and non-conformity with Government policy and targets and the objectives of the Core Strategy and supporting documents have also been considered and documented. Where possible the more sustainable options will be used in preparing the Plan Strategies.

Scale of Growth

Option 1 – Draft South East Plan Requirements
Conformity with other policy / initiative: Draft South East Plan
Non-conformity: Possible conflict with government target to achieve 60% development on brownfield land
Appraisal summary: Option performs well against the social and economic SA Objectives and should deliver increased affordable dwellings, an increase in the choice of dwellings type and tenure, better access to jobs, services and facilities.

Option 2 – Draft South East Plan + 25%
Conformity with other policy/initiatives: Draft South East Plan – indications are that SE Plan housing figures are only a guide and could be regarded as minimum requirements.
Non-conformity: Possible conflict with government target to achieve 60% development on brownfield land. Possible conflict with the AONB Objectives
Summary: Option performs well against the social SA Objectives, providing greater opportunities for contributions to developing social infrastructure including PRow. Uncertainty in respect of the economic growth required for the District and particularly that part of the District in the Sussex Coast Sub Region and what level of growth would be appropriate for the type of economic growth desired. Possibility of

greater significance of negative effects on the SA Objectives concerned with making efficient use of land, reducing greenhouse gas emissions, reducing traffic congestion and improving air quality, conserving and enhancing biodiversity and reducing waste generation.

Distribution of growth

Option 1 – Population based
Conformity with other policy/initiatives:
Non-conformity: PPS7 Sustainable Development in Rural Areas – development in rural areas should be based upon sustainable development principles – future growth under this option would not be considering sustainability principles first, purely existing population figures.
Summary: The option could deliver minor beneficial effects for health and well-being, for economic growth and access to services and culture and leisure activities. There would be a likelihood of adverse effects against the SA Objectives to improve efficiency in land use and the prudent use of natural resources; to reduce greenhouse gas emissions; to conserve and enhance biodiversity and to protect and enhance the natural and built environment. Unclear what the effects would be against the SA Objectives relating to water management, flooding and waste – these will be addressed further down the options hierarchy.

Option 2 – based on service centres
Conformity with other policy/initiatives: PPS7 Sustainable Development in Rural Areas – this options seeks to locate future growth using recognised sustainability principles
Non-conformity:
Summary: This distribution option follows general principles of sustainability by seeking to locate new growth in sustainable locations that offer a range of employment, services and facilities that assist reducing the need to travel by car and growth in emissions of greenhouse gases and promotes healthy lifestyles through facilitating walking, cycling and access to leisure. However there are issues that need to be considered surrounding the suitability of some settlements to accommodate the levels of growth that may be required by this distribution pattern. Unclear what the effects would be against the SA Objectives relating to water management, flooding and waste – these will be addressed further down the options hierarchy.

Option 3 – based on trends
Conformity with other policy/initiatives: Adopted Local Plan 2006
Non-conformity: PPS7 – development in rural areas should be

based upon sustainable development principles – future growth under this option would not be considering sustainability principles first, but trends

Summary: This option has similar effects to option 1 as to a greater extent it reflects existing population patterns and development boundaries because over 30% of this development has been small-site windfalls, which due to the nature of current planning policy are within urban development boundaries. If the Council wished to continue this trend it would need to allocate land rather than rely on windfall and this would necessarily require a significant proportion of greenfield land which has negative implications for the SA Objectives to improve efficiency in land use, reduce road congestion, air pollution and greenhouse gas emissions and to conserve and enhance biodiversity and the high quality natural and built environments.

Option 4 – based on Local Plan Strategy

Conformity with other policy/initiatives: ESCC and Brighton & Hove Structure Plan 1991-2011

Non-conformity:

Summary: The current strategy approach is broadly speaking looking to locate development as sustainably as possible by focussing development within or on the edge of existing settlements with service centre roles. However, there is a relatively large proportion of development directed to the villages –at this level of option appraisal it is unclear what the distribution between the villages may look like and how sustainable the resultant distribution may be. This will be investigated at the next tier of options. This option would be likely to give rise to negative effects on the SA Objective to reduce congestion, particularly given the current congestion problems in Battle and Rye and the relatively poor transport infrastructure in the District. The option may be encouraging car use due to the level of growth focussed at the villages and have associated negative effects for the Objective to reduce greenhouse gas emission, including from transport. There is a likelihood of adverse effects on conserving and enhancing biodiversity and the high quality built and natural environments.

Option 5 – based on Housing Needs Assessment 2005

Conformity with other policy/initiatives: broadly in line with PPS7 objective to “*focus most development in, or next to, existing towns and villages*”. Housing Needs Assessment 2005

Non-conformity:

Summary: As the option is based on locational preferences expressed by District residents it is assumed there would be a link between such locations and health and well-being, and accessibility to services and facilities as well as cultural and leisure facilities. The level of growth this option would direct to the market towns however could result in adverse effects on the SA Objectives to ensure efficient

use of land and resources, to reduce congestion and improve air quality, to reduce greenhouse gases, to conserve and enhance biodiversity, the built and natural environments.

Bexhill

Option 1 - Maintain Bexhill's role
Conformity with other policy/initiatives: Draft South East Plan and Sussex Coast Sub Region focus
Non-conformity:
Summary: Due to the level of growth attached to this option and the regeneration elements it should have positive effects for housing, health, social inclusion, accessibility and protecting and enhancing the character of the town. As the strategic growth areas are all greenfield land the option would be likely to have adverse effects on biodiversity and the efficient use of land. The new road associated with this option may in the short to medium term help relieve congestion; in the long term there are likely to be negative effects on air pollution and it does not reduce car usage. Less overall scope for economic turnaround.

Option 2 - Expand Bexhill's role
Conformity with other policy/initiatives: Draft South East Plan and particularly the economic focus for the Sussex Coast Sub Region
Non-conformity:
Summary: This option presents significant opportunities for providing affordable homes, improving health, deprivation, accessibility, educational attainment and for meeting the regional aspiration for economic growth in the Sussex Coast Sub region. As might be expected with a higher growth option there is a likelihood of adverse effects against the 'environmental' SA Objectives including efficiency in land use, reducing greenhouse gas emissions, improving air quality, conserving and enhancing biodiversity and reducing waste generation. Mitigation proposals could lessen the significance of effects but there will need to be some acceptance that there are negative aspects to higher growth aspirations.

Option 3 - Coordinated Approach to the Bexhill / Hastings Area
Conformity with other policy/initiatives: Draft South East Plan
Non-conformity:
Summary: There is more uncertainty associated with this option particularly around the option's ability to address deprivation issues in Bexhill and the need to raise educational attainment. The option could be considered to weaken the identity of Bexhill as the focus tends to be Hastings-led and the major improvements would be seen in Hastings and on the east of Bexhill – so the option doesn't necessarily consider the holistic needs of Bexhill as its own entity. Likely to result in less scope for Town Centre improvements. Similar

issues surrounding efficiency in land use, conserving biodiversity and generation of waste.

Battle

Option 1 – Support Market Town Role
Conformity with other policy/initiatives: PPS7 Development in Rural Areas
Non-conformity:
Summary: This option and its associated level of growth present a good opportunity for Battle to enhance its service centre role and sustain its economic growth, provide enough housing to meet the needs of the growing number of households and raise its educational attainment and encourage engagement in cultural and leisure activities. Due to its location in the AONB, the historic layout of the town and historic and archaeological assets, this level of growth is likely to lead to negative impacts on the environmental assets, as well as the usual negative environmental impacts associated with higher levels of development.

Option 2 – Limited Growth / Consolidation
Conformity with other policy/initiatives:
Non-conformity:
Summary: There is less scope with this option to ensure that everyone has the opportunity to live in an affordable home and for planning gain to help improve local facilities and services – including the early construction of the second primary school. Greater uncertainty in respect of sustaining economic growth and whether a limited growth option would be sufficient to support growth in the local economy. Potential for greater efficiency in land use and less adverse effects for reducing greenhouse gas emissions, congestion, waste generation and improving air quality.

Rye

Option 1 – Strengthen Market Town Role & Commercial Role of Rye Harbour & the Port of Rye
Conformity with other policy/initiatives: PPS7 Development in Rural Areas
Non-conformity:
Summary: This option and its associated level of growth present a good opportunity for Rye to enhance its service centre role and sustain economic growth, provide enough affordable accommodation and choice of accommodation to meet the growing number of households and raise its educational attainment as well as facilitating engagement in cultural and leisure activities. Due to Rye's significant national historic importance, rich archaeology and ecology and

location on the edge of the AONB, this level of growth is likely to lead to adverse impacts on Rye's environmental assets.

Option 2 - Strengthen the social functions of Rye and Rye Harbour and make the most of the important environmental circumstances

Conformity with other policy/initiatives:

Non-conformity: potential conflict with Housing Needs Assessment

Summary: There is less scope with this option to ensure that everyone has the opportunity to live in an affordable home and this is particularly important in light of the Housing Needs Assessment identifying a significant need for affordable housing in Rye. The option is generally more positive than option 1 for environmental matters and presents marginally less opportunity for enhancing and addressing social functions and issues.

Rural Areas

Option 1 - Continue to Focus on Service Centres

Conformity with other policy/initiatives: PPS7 Development in Rural Areas; The 'accepted option' at District-wide level.

Non-conformity:

Summary: there are many uncertainties assessing this option as detail on precise locations within or around the settlements is still unknown, the impacts would become much clearer at Site Allocations stage. The option performs well in respect of access to services and facilities including health, education, cultural and leisure activities and some job opportunities and consequently has the potential for beneficial effects against the objective to reduce greenhouse emissions. The option has the potential to generate less waste than the other options in this set due the potential for upgrading existing service provision rather than building new.

Option 2 - Development to Support Community Needs and deficiencies

Conformity with other policy/initiatives:

Non-conformity: PPS7 Development in Rural Areas

Summary: there are many uncertainties assessing this option as detail on precise locations within or around the settlements is still unknown, the impacts would become much clearer at Site Allocations stage. There is potential for beneficial effects for improving health and well being and reducing social exclusion. There is potential for adverse effects on reducing greenhouse gas emissions and waste arising due to the likely need to build and operate a supply of new facilities.

Option 3 - Focus development of Few Larger Villages
Conformity with other policy/initiatives:
Non-conformity:
Summary: This option results in a number of neutral effects against SA Objectives – this is often due to the positive and negative effects balancing each other out. This is primarily due the geographical concentration of the four villages which are the focus of development for this option and therefore the relative neglect of a large geographical area of the District – home to a significant number of smaller villages.

Option 4a - Dispersed Development
Conformity with other policy/initiatives: High Weald AONB Unit & English Heritage representations;
Non-conformity: PPS7 Development in Rural Areas
Summary: the option has a greater potential for adverse effects than options 1-3 due to its underlying principle of dividing growth on the basis of population with no regard to service provision, community needs or accessibility.

Option 4b - Dispersed Development including Historic Farmsteads
Conformity with other policy/initiatives: High Weald AONB Unit
Non-conformity: PPS7 Development in Rural Areas
Summary: Option 4b has similar effects to option 4a as would be expected given the underlying approach based upon a wide dispersal. In considering this approach to development in the countryside, there is a need to balance the aspirational nature of the High Weald AONB Unit's proposal to benefit the management of the environment, with the physical impact of such a proposal on the landscape character and integrity of the District's historic farmstead patterns.

Option 5 Focus Development on Transport Corridors
Conformity with other policy/initiatives:
Non-conformity:
Summary: The effects of this option would become clearer when locations for development along the transport routes were known. There is the potential with this option for it to encourage car use and a general increase in travelling by road, which would result in adverse effects against the objectives to reduce car usage and greenhouse gas emissions. There would be a need to ensure that village and settlement identities were not adversely affected.

Rural Areas - Countryside

Option 1 - Continue to limit development in the countryside
Conformity with other policy/initiatives: PPS1 Creating Sustainable Communities; PPS7 Sustainable Development in Rural Areas; PPS3 Housing;
Non-conformity:
Summary: The option may be considered to unduly stifle housing delivery in areas of need for affordable housing in the countryside and consequently not contribute to reducing inequality and deprivation where evidence shows this is due to a lack of access to affordable, decent homes. An issue which may further compound the relative pockets of deprivation in the countryside, is the limiting ability of the option to address rural economic concerns where schemes which would benefit the economy of the countryside may be overlooked. Positive effects may be expected in relation to the SA Objectives to ensure the prudent use of natural resources, to conserve and enhance biodiversity and to protect and enhance the high quality natural environment. Uncertainty over the longer terms effects for road congestion issues and the quality of the built environment for the District as a whole.

Option 2 – Supporting more extensive development in the countryside to stimulate and support farming economies, tourism & recreation
Conformity with other policy/initiatives: PPG21 Tourism; PPS7 Sustainable Development in Rural Areas – in relation to sustainable economic growth and diversification
Non-conformity: elements of PPS7 that relate to a high level of protection for the most valued environments – in this instance the AONB
Summary: A great deal of uncertainty largely due to the fact that the option does not indicate the position for housing development with this option – is it purely development for economic purposes or will this be balanced with affordable housing provision where required? Beneficial effects for the SA Objectives concerning the economy, culture and leisure; adverse effects for the SA Objectives relating to the protection of the high quality natural environment, reducing road congestion and improving air quality, and reducing waste generation.

Option 3 – Intensification and extension of isolated farmsteads to provide dwellings
Conformity with other policy/initiatives: High Weald AONB Unit representations
Non-conformity: possible conflict with PPS7; PPG13 Transport; PPS3 Housing
Summary: The option should produce beneficial effects for the provision of decent affordable homes for all, health and well-being,

reducing deprivation, raising educational attainment (addressing the skills gap of those engaged in land-based economic activity and raise aspirational educational attainment) and rural economic growth. There are concerns over the potential legal considerations in terms of the enforceability of occupancy conditions. Adverse effects may be expected for the SA Objectives concerning reducing traffic movements, conserving and enhancing biodiversity and the high quality natural and built environment and reducing waste generation.

Communities

Affordable Housing Percentage

Option 1 – Continue with the percentages set out in Local Plan Policy HG1

Conformity with other policy/initiatives: South East Plan including Sussex Coast Sub-Region Chapter; Rother Local Plan 2006

Non-conformity:

Summary: Whilst the option has been successful in increasing the delivery of affordable housing, a flat 40% doesn't at present recognise the different requirements within different parts of the District, particularly between Bexhill and the rural area. This issue leads to the potential for adverse effects against the SA Objectives to reduce social exclusion, car usage and greenhouse gas emissions and would likely not improve accessibility or efficiency in land use.

Option 2 - Adjust the percentage requirements for affordable housing by means of a requirement for: 50% in Rural Villages 40% in Rye and Battle 35% in Bexhill

Conformity with other policy/initiatives: South East Plan and Sussex Coast Sub-region Chapter

Non-conformity:

Summary: it can be surmised that a higher requirement of affordable housing in rural areas would not necessarily hamper the economics of development to the same extent as in other areas and lowering the requirement to 35% for Bexhill should help facilitate development in the District's largest urban service centre. The option should produce beneficial effects for SA Objectives considering housing, health, social exclusion, accessibility, economic growth, efficiency in land use, car use, and the built and natural environment. No adverse effects have been identified at this stage.

Affordable Housing Threshold

Option 1 - Continue with the thresholds set out in Local Plan Policy HG1
Conformity with other policy/initiatives: Rother Local Plan 2006
Non-conformity:
Summary: As discussed, the adoption of the Affordable Housing SPD has resulted in increased delivery of affordable housing; however the problem of affordability is still intensely felt and could be addressed further. Potential for adverse effects similar to those experienced under Percentage Option 1 - potential for adverse effects against the SA Objectives to reduce social exclusion, car usage and greenhouse gas emissions and would be likely not to improve accessibility.

Option 2a - lower the threshold in all urban areas from the current 15 to 10
Conformity with other policy/initiatives:
Non-conformity:
Summary: The Housing needs Survey 2005 demonstrated particularly high housing need in Rye and Battle, which suggests that a distinction should be made between the two market towns and Bexhill. This option makes no such distinction. There is a significant element of uncertainty with this option surrounding the issue of development in Bexhill and whether this new, lower threshold would further still favour rural areas (and possibly the market towns) over Bexhill for development as more desirable locations?

Option 2b - to lower the threshold in Rye and Battle to 10 but to maintain it at 15 in Bexhill
Conformity with other policy/initiatives: Housing Needs Survey 2005, the Housing Market Assessment. The South East Plan
Non-conformity:
Summary: The Housing needs Survey 2005 demonstrated particularly high housing need in Rye and Battle, which suggests that a distinction should be made between the two market towns and Bexhill. Therefore, a lower threshold in the market towns vis-à-vis Bexhill may be justifiable since there is stronger evidence of affordability problems in these areas than in Bexhill. The option should also have indirect effects associated with potential increases in housing provision in towns rather than rural areas improving accessibility (and reducing the need for private car use) across the District, reducing social exclusion by more adequate provision of affordable housing where needed, supporting economic growth and possibly assisting in containing the increase in greenhouse gas emissions (though house-building naturally increases emissions).

Option 3a - Lower the rural threshold from 5 to 3, and from 0.2ha to 0.12ha
Conformity with other policy/initiatives:
Non-conformity:
Summary: If the threshold were 50% option 3a would result in the delivery of more affordable housing than option 3b. For example if the threshold were 50%, under option 3a a four dwelling development would comprise two affordable dwellings, however under option 3b the same four dwelling development would only require one affordable unit. Assessment against the SA Objectives shows positive effects for housing, health and well-being, reducing social exclusion and supporting rural economies. No adverse impacts have been identified but there is some uncertainty over the effects on accessibility.

Option 3b - Maintain the rural threshold of 5, but require all developments of 3 and 4 dwellings to provide one affordable dwelling
Conformity with other policy/initiatives:
Non-conformity:
Summary: If the threshold were 50% option 3a would result in the delivery of more affordable housing than this option 3b. For example if the threshold were 50%, under option 3a a four dwelling development would comprise two affordable dwellings, however under option 3b the same four dwelling development would only require one affordable unit. Assessment against the SA Objectives shows similar results to Option 3a.

Affordable Housing Type

Option One: Apply a minimum of 25% social housing and 10% intermediate on all sites
Conformity with other policy/initiatives: The South East Plan
Non-conformity: Rother and Hastings Housing Market Assessment 2006
Summary: This option would rigidly and inflexibly apply the Draft South East Plan stipulation that the mix should include at least 25% social-rented and at least 10% intermediate. This option would apply blanket proportions to urban and rural areas which evidence shows have different needs.

Option Two (Preferred): Stipulate Separate Proportions between Bexhill and Rest of the District, as follows
<ul style="list-style-type: none"> Bexhill Option: Social rented would comprise 20-25% of the mix on Bexhill major development sites, with the balance (15-20%) comprising intermediate housing. Rural Option: A proposed mix of 10%-20% intermediate,

20%-30% social rented in rural areas.
Conformity with other policy/initiatives: Rother and Hastings Housing Market Assessment 2006
Non-conformity: South East Plan
<p>Summary: In the Hastings & Rother Housing Market Assessment, DTZ recommended that social rented should comprise no more than 25% due to concerns about the impact of provision of up to 40% social rented would have on the social mix and dynamics of the Bexhill Community. Although the South East Plan suggested that the mix should comprise at least 25% social rented (see option one), a lower level of 20% on some Bexhill sites would be balanced by a higher level on some rural sites. Evidence shows that on sites in rural Rother, Rye and Battle the balance should be tilted slightly more towards social housing, due in part to the stock of social rented dwindling over time as a consequence of the 'right to buy'.</p> <p>An important caveat to both the above options is that in all circumstances, the Housing Service will advise on the types of affordable housing that are appropriate on individual sites at particular time. If appropriate, the proportions on particular sites may vary from the set standard.</p>

Affordable Housing Allocations

Option 1 - Retain principle of exception sites in line with current local plan policy
Conformity with other policy/initiatives: Rother Local Plan 2006
Non-conformity:
<p>Summary: Although in practice the policy has yet to result in additional affordable housing it has not had much time to produce results since the Local Plan adoption in 2006. The policy remains a positive step to address the issue of affordable housing shortage and should be retained. Other policy pertaining to design, biodiversity and sustainable building will be useful in mitigating this option.</p>
Option 2 - Allocate small sites (less than 10 dwellings) wholly or substantially for affordable housing in areas of need
Conformity with other policy/initiatives: PPS 3 Housing
Non-conformity:
<p>Summary: allocations that are wholly or substantially for affordable housing on smaller sites could supplement the provision of affordable housing in settlements of particular need.</p>

Housing Mix

Option 1 - Retain Local Plan policy of 30% requirement of 1&2 bed properties as stands
Conformity with other policy/initiatives: PPS 3 Housing
Non-conformity:
Summary: The 2006 Housing Market Assessment of Hastings and Rother forecast the household composition of Rother in 2026 as being comprised of 82% one or two person households. A background Paper to the 2005 Housing Needs Assessment entitled 'Rother – Supply/Demand Analysis 2005' indicates that for private sector housing, the only significant shortfall is for 2 bedroom properties. For affordable housing the largest shortfall is for 1 bedroom properties, but there is also a significant shortfall of 2 bedroom properties. Therefore this option may not be appropriately addressing the housing need.

Option 2 - Aim for a higher target of 40% in rural areas, where the need is greatest
Conformity with other policy/initiatives: PPS 3 Housing
Non-conformity:
Summary: A higher proportion of one and two bed properties than the current local plan requirement of 30% would seem to be heavily supported by evidence. The option should be better able to positively address the SA Objectives relating to housing, health and well-being, reducing deprivation, sustaining economic growth, accessibility to appropriate housing and arguably efficiency in land use.

Environment

Design Quality

Option 1 - Maintain a general expectation of design quality as a consideration in the planning process
Conformity with other policy/initiatives:
Non-conformity:
Summary: This option is broadly supportive of providing sustainably constructed homes, reducing fear of crime, sustaining economic growth, conserving biodiversity, protecting the natural and built environment. The option could score more positively against these objectives with clearer design criteria and locally specific policies.

Option 2 - set achieving high design quality as a central theme in the planning process
Conformity with other policy/initiatives: PPS1 requirement for Local Authorities to prepare robust policies on design; PPS3 Housing; By Design – Urban Design in the Planning System (ODPM / CABE 2000)

Non-conformity:

Summary: The option has greater potential for more positive effects against a number of the SA Objectives. Option could be improved further by including design principles covering crime and biodiversity. The option should score more positively when details of the criteria under each key principle are developed. Providing clear criteria against which design quality can be tested should facilitate the successful implementation by development control and consequently improve design quality across the District.

Biodiversity and Greenspace**Option 1 - Use existing policy to conserve and enhance natural green space****Conformity with other policy/initiatives:****Non-conformity:**

Summary: The option presents opportunities for a number of beneficial effects on SA Objectives concerning health and well-being, accessibility, engagement in leisure activities, minimising the risk of flooding and protecting and enhancing the natural and built environment. The option is however limited to improvements where development is proposed and does not as such take a strategic overview of greenspace provision in the District or of the multifunctional nature that greenspace can offer through its ability to mitigate flooding, provide land for sustainable drainage and provide wildlife corridors to support and enhance biodiversity.

Option 2 - Use of ANGst model to build up evidence base by mapping sites and identify areas where potential for improvement.

Conformity with other policy/initiatives: Natural England's ANGst Model; South east Plan and PPS9 in giving importance to biodiversity in greenspace provision.

Non-conformity:

Summary: This option would allow an evidence base to be built up to underpin the provision of a greenspace network and developer contributions. It has greater opportunities for improving accessibility, water resource management and biodiversity than option 1. The option allows elaboration on areas of strategic opportunity identified at the regional level, for example the Romney Marsh Living Landscape coastal habitat in accordance with South East Plan policy NRM4. This option offers a more proactive approach to greenspace provision rather than one that relies on reacting to given development proposals (as with option 1).

Sustainable resource Management

Option 1 - Achieve more sustainable development through the promotion and application of new Government targets
Conformity with other policy/initiatives:
Non-conformity:
Summary: the option promotes sustainable resource management in line with the Government's objective for sustainable communities. Beneficial impacts as identified will become greater over time as the Government raises the standards to be met and introduces a mandatory level of the Code for Sustainable Homes and raises this level over time (Level 3 in 2010; Level 4 in 2013) to achieve Code Level 6 by 2016.

Option 2 - Achieve exemplar sustainable development by extending beyond the Government targets where appropriate and setting locally specific targets
Conformity with other policy/initiatives: PPS22 and PPS1 and Draft South east Plan
Non-conformity:
Summary: the option aims to place the District at the forefront of sustainable resource management, it ensures better resource management in rural areas and particularly allows for tighter control over greenfield and AONB sites. The option again sees impacts becoming more beneficial over time and this is due to the need to ensure local standards are raised ahead of national standards to maintain the forefront position. There is uncertainty over the economic impacts and this option may place unduly onerous obligations on certain sites that affect their viability – future evidenced-based work in this area will provide a clearer picture.

Economy

Option 1 - To make generous provision for sites and premises
Conformity with other policy/initiatives: Draft South East Plan priority for economic regeneration in the Sussex Coast Sub-Region
Non-conformity:
Summary: This option should deliver broadly beneficial effects for the social and economic objectives; a better understanding of the impacts would be achievable when locations for economic growth and regeneration have been identified. The option is likely to deliver adverse effects on a number of the environmental objectives including efficiency in land use, reducing greenhouse gas emissions, enhancing biodiversity and reducing waste generation. This is inevitable with options that promote growth, which ultimately increase waste, traffic and require land take. Opportunities exist to mitigate these negative effects by ensuring the sustainable use of resources, sustainable

construction and where possible renewable energy generation to supply new development.

Option 2 - To set aside only modest areas for employment uses

Conformity with other policy/initiatives:

Non-conformity:

Summary: There is more uncertainty in assessing this option as it is not yet clear exactly how smart growth will be delivered and what the changes to existing employment areas will be to accommodate and promote this smart growth. The option should deliver generally positive effects on health and well-being, educational achievement, and economic growth. In terms of environmental impacts this option should have less adverse effects than option 1 and could furthermore have beneficial effects on efficiency in land use and resources, conserving biodiversity and protecting the natural environment.

Transport and Accessibility

Option 1 - Focus on investment in road and rail transport

Conformity with other policy/initiatives:

Non-conformity:

Summary: new road and rail infrastructure is likely to have beneficial effects on the District's business and tourism economies and accessibility both within and to and from the District. There could be some localised improvements in congestion and consequent benefits for some of the built environments. Adverse effects might be expected against the objectives to reduce greenhouse gas emissions, conserve and enhance biodiversity (and the natural environment) and reduce waste generation.

Option 2 - Focus on investment in improvements in local transport infrastructure and services

Conformity with other policy/initiatives:

Non-conformity: the Draft South East Plan recognition of the importance of strategic transport infrastructure to achieving regeneration and sustainable economic growth in the Sussex Coast.

Summary: This option is judged to be generally positive in respect of the SA Objectives for health, efficiency in land use, increasing travel choice and reducing greenhouse gas emissions. Without further detail of specific local schemes to be implemented it is hard to assume precise benefits or disbenefits to particular local communities which may be applicable through implementation of this option. There are a number of SA Objectives against which effects are judged to be neutral – it may be possible with increasing detail to enhance some of these to beneficial effects. The main uncertainty and one of the balancing factors in judging neutral effects is that of the rural

communities and how they would be served by this option. Clearly more opportunity exists in the urban areas and particularly the town to deliver this option to its full potential. Furthermore the option does not assist the District in terms of asserting its identity within the sub-region and reducing the District's peripheral nature.

5.5 The Preferred Options and the reasons other options were rejected

5.5.1 Table 5.1 indicates which of the options the Council has rejected and which have been accepted.

Table 5.1 Options accepted and rejected and the reasons

Option	Reason for Acceptance or Rejection
Scale of Growth	
1	Accepted – Analysis against SA and Plan Objectives support this option
2	Rejected – economic, infrastructure and environmental concerns
SPATIAL OPTIONS	
Spatial Distribution of Growth	
1	Accepted in part - used to moderate Option 2
2	Accepted moderated by need and accessibility
3	Rejected – Analysis against SA and Plan Objectives show could be unacceptable levels of growth for some villages
4	Rejected – Analysis against SA and Plan Objectives show could be unacceptable levels of growth for some villages and the market towns
5	Accepted in part - used to moderate Option 2 in terms of housing needs, but could be unacceptable levels of growth for the market towns
Bexhill	
1	Accepted in conjunction with Option 3
2	Rejected as economic growth forecasts and housing market conditions do not support this growth agenda; uncertainty over infrastructure provision and cumulative impact on town's character
3	Accepted in line with Plan Objectives and shared vision moderated by Option 1 recognising Bexhill's independent but complementary function vis à vis Hastings, as well as its own priorities for future well-being
Battle	
1	Accepted – cross check against SA and Plan Objectives has shown that careful implementation of this option would be more beneficial than a lower growth option in terms of

	recognising Battle's service centre role and providing for local economic, housing and community needs subject to environmental acceptability	
2	Rejected – option would not provide adequate support for the local economic, housing and community needs	
Rye		
1	Accepted in part	Assessment against the SA and Plan Objectives has found that an amalgam of the two options would best address the particular circumstances of the area. A balance is required between housing and employment whilst minimising adverse effects on the high quality natural, built and historic environment, notwithstanding the need to plan carefully with regard to flood risk taking into account climate change
2	Accepted in part	
Rural Areas (labelled A-E in the Core Strategy)		
1	Accepted taking into account environmental constraints, local needs (Option 2) and accessibility (Option 5)	
2	Accepted in part – does the most out of all options to address affordable housing but doesn't necessarily seek the most sustainable options	
3	Rejected – focussing development on a small number of villages may have a negative impact on the cohesiveness of those settlements, furthermore smaller villages in the District may be denied development which could be used to facilitate community services and facilities	
4a	Rejected – although option may distribute development in a way that is perceived as 'equal', population is not always a gauge to accessibility, provision of services or local needs and therefore the option may be contrary to sustainable planning. SA assessment shows that the option has a greater potential for adverse effects than options 1-3	
4b	Rejected at outset – such a policy is contrary to national (PPS3 and PPS7) and regional planning policy, SA identified potential adverse affects for improving accessibility and reducing car use. Matters dealt with in this option overlap more directly with the issues of exception site policy and key worker affordable housing	
5	Accepted in part – concern over the issues of encouraging car use and withholding development from other buoyant local service villages such as Northiam and Peasmarsch	
Rural Areas - Countryside		
1	Accepted – option offers the best and most appropriate level of protection for the AONB. In terms of addressing rural housing needs the option should be mitigated to ensure greater provision of affordable housing particularly for those employed in local land-based economies and ensure the option does not lead to increased deprivation in rural areas	

	due to a lack of affordable housing
2	Rejected – the results of the SA show a number of uncertainties with this option as it stands. It is considered that there would be unacceptable adverse impacts for the AONB and its historic settlement pattern. The SA identifies adverse impacts in relation to the need to reduce traffic movements, improve air quality and reduce greenhouse emissions
3	Rejected – contrary to PPS3 Housing, PPS7 Sustainable Development in Rural Areas and PPG13. South East Plan recently had supporting policy removed through the Panel Report
CROSS-CUTTING OPTIONS	
Communities – Affordable Housing	
Affordable Housing Percentage	
1	Undetermined – the SA has shown a flat 40% doesn't at present recognise the different requirements within different parts of the District, particularly between Bexhill and the rural area. Waiting for the input from consultation.
2	Undetermined - lowering the requirement to 35% for Bexhill should help facilitate development in the District's largest urban service centre. Waiting for the input from consultation.
Affordable Housing Threshold	
1	Rejected - the Affordable Housing SPD has resulted in increased delivery of affordable housing; however the problem of affordability is still intensely felt and could be addressed further.
2 (a)	Rejected - the Housing needs Survey 2005 demonstrated particularly high housing need in Rye and Battle, which suggests that a distinction should be made between the two market towns and Bexhill. This option makes no such distinction.
2 (b)	Accepted in principle – waiting for input from consultation.
3 (a)	Accepted in principle – waiting for input from consultation. SA highlights that if the threshold were 50% option 3a would result in the delivery of more affordable housing than option 3b.
3 (b)	Accepted in principle – waiting for input from consultation. if the threshold were 50% option 3a would result in the delivery of more affordable housing than this option.
Affordable Housing Type	
1	Rejected - this option would rigidly and inflexibly apply the Draft South East Plan stipulation that the mix should include at least 25% social-rented and at least 10% intermediate.

	This option would apply blanket proportions to urban and rural areas which evidence shows have different needs.
2	Accepted - evidence shows that on sites in rural Rother, Rye and Battle the balance should be tilted slightly more towards social housing – SA supports this option showing the potential for more significant beneficial effects.
3	Accepted – the HMA showed the stock of social rented housing in Rural Rother has been eroded by the ‘right to buy’ therefore this option provides a way to redress the balance by increasing the percentage of social rented required on new sites.
Affordable Housing Allocations	
1	Accepted – the SA concludes that policy remains a positive step to address the issue of affordable housing shortage and should be retained.
2	Accepted - should supplement the provision of affordable housing in settlements of particular need.
Communities - Housing	
Housing Mix	
1	Rejected – the SA has highlighted that this option may not be appropriately addressing the housing need
2	Accepted – a higher proportion of one and two bed properties than the current local plan requirement of 30% would seem to be heavily supported by evidence. The SA supports this option.
Economy	
1	Accepted – assessment against Sustainability Objectives has shown that Option 1 should broadly deliver economic and social benefits but may have several adverse environmental impacts, although these may be mitigated through measures such as sustainable use of resources in construction and energy generation, as well as citing in highly accessible locations
2	Accepted in part – SA of Option 2 shows it could offer more positive impacts against the range of sustainability objectives, but its economic contribution is difficult to assess as the nature and potential of smart growth is not yet clear
Environment - Design Quality	
1	Rejected – doesn’t perform poorly against SA or Plan Objectives but doesn’t have the potential of Option 2 for ensuring government policy and best practice are implemented, furthermore it doesn’t raise the profile of design emphasising the critical importance of good design in the planning process
2	Accepted – assessment against SA and Plan Objectives shows this option has the greater potential to ensure design quality properly responds to the district’s environmental

	character	
Environment - Biodiversity and Greenspace		
1		Rejected - The option is limited to improvements where development is proposed and does not as such take a strategic overview of greenspace provision in the District or of the multifunctional nature that greenspace can offer through its ability to mitigate flooding, provide land for sustainable drainage and provide wildlife corridors to support and enhance biodiversity
2		Accepted – option would allow a more proactive approach to provision of greenspace and conservation and enhancement of biodiversity. The option allows for the elaboration of the idea of areas of strategic opportunity as identified in the SE Plan. The development of a green network across the District is considered important helping to protect wildlife from the potential impact of climate change. SA and Plan Objective assessment supports this option
Environment - Sustainable Resource Management		
1		Undetermined – assessment against the Sustainability Objectives has shown Option 1 promotes sustainable resource management in line with the Government's objective for sustainable communities. Beneficial impacts as identified will become greater over time as the Government raises the standards to be met and introduces a mandatory level of the Code for Sustainable Homes (consultation on both options to inform decision)
2		Undetermined - the SA has shown that option 2 aims to place the District at the forefront of sustainable resource management, it would ensure better resource management in rural areas and would particularly allow for tighter control over greenfield and AONB sites. Consideration of these options against the Plan Objectives has shown that Option 2 has the greater potential to meet the objectives – particularly minimising emissions and making efficient use of resources though more research is required to determine viability of various sites in the District
Transport		
1	Accepted	Option 1 would contribute to strategic transport infrastructure and services, the longer-term prosperity of the area, key improvements and reducing the relative peripherality of the District. However, this should not detract, or distract, from local priorities (Option 2) for improved access to local jobs, shops, education and healthcare, and for the opportunities for this by sustainable transport modes
2	Accepted	

5.6 Proposed mitigation measures

5.6.1 No mitigation measures were proposed at this stage.

6 SUSTAINABILITY APPRAISAL OF THE PREFERRED PLAN STRATEGIES

6.1 Introduction

- 6.1.1 Following on from the assessment of the main strategic options, those options that have been accepted have been used to form the basis of the development of the Plan Strategies. Consultation with Council officers, elected Members and with key stakeholders (Town and Parish Chairmen and Clerks, utilities and infrastructure providers) on the synopsis of the Core Strategy has also provided valuable input into the formation of the Plan Strategies.
- 6.1.2 As a consequence of the iterative nature of the development of the Core Strategy, the Plan Strategies within it have undergone a number of editorial and presentational changes. As is best practice, the SA has been assessing the effects of the emerging strategies alongside their evolution.
- 6.1.3 A recent presentational change to the Core Strategy has seen a number of strategies being broken into their component parts and details of future policy directions included. In the majority of cases, the strategy elements have not been significantly altered; it was therefore considered prudent to retain, where possible, the existing SA of the topic areas taken as a whole. This includes the Strategies for Environment and Communities.
- 6.1.4 Any substantially revised strategies, new strategies or new strategy elements have undergone further SA work. It is important to note that at this juncture the future policy elements that have been presented within the strategies under the heading “*this will be achieved by:*” have not been subject to SA. This is because it is important to firstly establish the relative sustainability of the higher level strategies, which may still be subject to changes as a result of this round of public consultation.
- 6.1.5 The SA will continue to inform the development of the Plan Strategies and their associated policies through the iterative process of assessment and review. The SA Report that will accompany the Core Strategy DPD at the pre-submission stage will include the appraisal of the Plan Strategies including the final worded policies that sit within them.
- 6.1.6 At this stage however it is only the overarching strategy elements which have been the subject of the SA. (The strategy elements have been devised with full regard to the Plan Objectives, the SA of the Plan Objectives, the Issues and Options consultation, the evidence based studies and the SA of the initial options.)

6.1.7 The SA of the Plan Strategies provides a good indication of the sustainability of the future policies. The future policy wording will be a coherent progression from the strategies in light of the consultation on the Core Strategy Directions Document and this Initial Sustainability Appraisal.

6.1.8 The Strategies are presented in Appendix 5.

6.2 Significant social, environmental and economic effects of the Plan Strategies

6.2.1 Each of the Plan Strategies has been assessed against the SA Objectives. The detailed assessment including: over the short, medium and long term; conformity with higher level policy; cumulative and synergistic effects; mitigation; and monitoring proposals can be viewed in Appendix 6.

6.2.2 A summary of the significant social, environmental and economic effects of the principal strategies is presented below by SA Objective, preceded by a crude summary appraisal table which gives a broad indication of the effects of the strategies against the SA Objectives. Crosses or ticks with no brackets denote a potentially significant effect.

Table 6.1 Crude summary appraisal of principal strategies table

SA	Principal Plan Strategies Crude Appraisal Summary Table									
	Distribution	Bexhill	Battle	Rye	Rural	Communities	Economy	Environment	Transport	Delivery
Housing	✓	✓	(✓)	(✓)	(✓)	✓	~	~	~	(✓)
Health	✓	✓	(✓)	(✓)	(✓)	✓	~	(✓)	(✓)	(✓)
Crime	~	~	~	~	~	✓	~	~	(✓)	(✓)
Deprivation	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)	✓	~	(✓)	(✓)
Education	~	(✓)	✓	(✓)	(✓)	~	✓	~	~	(✓)
Economy	✓	✓	✓	✓	✓	~	✓	(✓)	✓	(✓)
Access	(✓)	✓	✓	(✓)	✓	~	~	~	✓	(✓)
Culture/leisure	~	(✓)	✓	(✓)	(✓)	(✓)	?	(✓)	(✓)	(✓)
Prudent use of resources	✓	(X)	(✓)	?	(✓)	(✓)	?	✓	(✓)	(✓)
Car use	(X)	(✓)	✓	~	(X)	~	(X)	~	(✓)	(✓)
Emissions	X	(X)	(X)	(X)	(X)	~	(X)	✓	(✓)	(✓)
Flooding	~	~	~	?	~	~	?	✓	~	(✓)
Water quality	~	?	~	~	~	~	~	✓	~	(✓)
Biodiversity	X	(X)	?	?	(✓)	~	?	✓	~	(✓)
Environment	~	~	✓	(✓)	✓	~	?	✓	(✓)	(✓)
Waste	X	X	(X)	(X)	(X)	~	(X)	(✓)	~	~

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

- 6.2.3 The significant effects on this SA Objective are beneficial and will potentially be from the Distribution of Development, Bexhill and Communities Strategies. The Distribution Strategy seeks to deliver the requirements in the South East Plan, though there is still some considerable debate regarding overall housing numbers allocated to the region and whether indeed the overall numbers would meet all housing needs now and in the long term. The Strategy for the Distribution of Development seeks to give particular attention to meeting local needs.
- 6.2.4 The Strategy relating to the timing of the Link Road provides useful contingency measures for ensuring that housing delivery levels do not fall short in the event of a delay to the Link Road which is required to unlock major development areas at Bexhill.
- 6.2.5 The Strategy for Bexhill should deliver strategic sites for major housing growth and it promotes the housing needs of younger people. The strategies for Rye, Battle and the Rural Areas all contribute to the overall provision of housing in the District.
- 6.2.6 The strategy for Communities has a strong focus on improving the range, quantity and affordability of housing. This includes making provision for affordable housing to address local need, easier access to housing for younger people, greater emphasis on small, cheaper housing, bringing forward a range of suitable housing and meeting responsibilities in terms of appropriate provision for Gypsies and Travellers.
- 6.2.7 The Strategy for the Environment is beneficial for this SA Objective in respect of achieving sustainably constructed homes.

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

- 6.2.8 Similarly potential for the most significant beneficial effects on the health SA Objective will be from the Distribution of Development, Bexhill and Communities Strategies. The reason for this is largely connected to the links between good quality, affordable housing and health and well-being.
- 6.2.9 The Bexhill Strategy specifically calls for investment in quality open space, improved access to leisure and health facilities and improved access to health and training programmes alongside the major housing provision identified.

6.2.10 The Communities Strategy, as well as providing suitable housing to meet all types of local need, makes clear the need to promote healthy lifestyles through improved provision of accessible, high quality recreation space. The strategy also addresses health inequalities through promoting the importance of ease of access to doctors surgeries.

[Reduce crime and the fear of crime](#)

6.2.11 This SA Objective is mainly affected by the Communities Strategy, which promotes working with partner authorities to address issues of crime and disorder and should help lead to significant beneficial effects for reducing crime and the fear of crime.

6.2.12 The Strategy for the Environment should also result in beneficial effects for this SA Objective through its requirement to place high quality design centrally in the design process and this includes principles of designing out crime in new development.

[Reduce deprivation and social exclusion](#)

6.2.13 All but one of the principal strategies has been judged to have a beneficial effect, either minor or significant, on reducing deprivation and social exclusion. Significant beneficial effects on reducing deprivation and social exclusion should be experienced as a result of the implementation of the Strategy for Economy.

6.2.14 This Strategy promotes improved employment opportunities and particularly those that offer vocational training elements and opportunities to up-skill, which should help reduce deprivation. Economic regeneration within the coastal sub-region should help address deprivation issues in Bexhill and Rye.

[Raise educational achievement levels and develop the opportunities for lifelong learning](#)

6.2.15 The strategy with potential for significant beneficial effects for raising educational attainment is the Strategy for Economy, which requires action in increasing workforce skills through investment in education and through extended vocational training.

6.2.16 Other strategies in combination may also lead to significant beneficial effects for raising educational attainment (including the Strategies for Battle, Bexhill, Rye and the Rural Areas) and this will be highlighted in the cumulative effects section.

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

- 6.2.17 Collectively the Strategies within the Core Strategy have a strong economic focus, as directed by the South East Plan in order to raise the economic profile of the region and particularly to deliver economic regeneration to the Sussex Coast Sub-Region.
- 6.2.18 Strategies for the Distribution of Development, Bexhill, Battle, Rye, the Rural Areas and for the Economy have all been assessed as having potential for significant beneficial effects for sustaining economic growth and competitiveness.
- 6.2.19 The Strategy for Distribution aims to promote economic regeneration in Bexhill and support, with development, the market town roles of Rye and Battle. It also permits development in the countryside which explicitly serves to promote sustainable land-based industries and sensitive diversification to sustain the rural economy. The Strategy also considers the long term prospects for the smaller villages and settlements in the countryside.
- 6.2.20 The Strategy for Bexhill has a strong economic focus seeking to provide new employment space in the town centre and Sidley and additional retail floorspace in the town centre. Providing the transport capacity and particularly the road link should also support the businesses operating in the area and attract new investment. In aiming to help younger people onto the housing ladder and therefore remain or move to the area the Strategy supports economic growth by helping to maintain the workforce.
- 6.2.21 The Strategy for Battle should enable new employment opportunities and growth in tourism. This coupled with the provision of new retail floorspace and better road and rail connections to London, Tunbridge Wells and Hastings as well as improved traffic movements across town should contribute to beneficial effects for the local economy.
- 6.2.22 The economy of Rye is central to the Strategy for Rye. As well as an increase in general economic opportunities and better road and rail connections the Strategy explicitly concerns itself with the commercial viability of the Port of Rye and the importance of the increasing commercial activity and associated sea-faring interest to sustain this important local industry.
- 6.2.23 There is a strong economic focus to the Rural Areas Strategy, which supports initiatives and facilities that improve local business, farming and other land-based activities, local agricultural enterprise and diversity and tourism.

- 6.2.24 Many aspects of the economy and workforce are addressed through the Strategy for Sustainable Economic Development. The provision of suitable land and premises, support for local business and enterprise, economic regeneration and the encouragement of growth and high-tech industries.
- 6.2.25 In improving access to jobs and improving the strategic transport infrastructure the Strategy for Transport and Accessibility is supporting economic growth by facilitating access to jobs for the workforce and making the District more attractive to businesses. The strategy is also supporting the tourism economy with consequent prosperity improvements.

[Improve accessibility to services and facilities for all ages across the District](#)

- 6.2.26 Potential for the most significant beneficial effects on improving accessibility within the District is from the Bexhill, Battle, Rural Areas and Transport Strategies. Other strategies including that for Rye and the general Distribution Strategy should have beneficial effects but are not judged to be as significant – details of proposed mitigation and likely cumulative effects can be found in later sections.
- 6.2.27 The Strategy for Bexhill promotes the development of a wide ranging sustainable transport strategy, alongside improved transport capacity, providing for major growth in accessible locations and improved community infrastructure, which should collectively have beneficial effects for this SA Objective.
- 6.2.28 The Strategy for Battle has a strong accessibility focus concerned with improved cross-town transport services for better linkages to facilities and services, improved rail connections to Hastings, Tunbridge Wells and London and a development pattern that promotes locations that reduce the need for, particularly, cross-town traffic movements thereby providing better access for residents to the everyday services they need.
- 6.2.29 The Strategy for the Rural Areas aims to deliver improved access to day-to-day services and facilities. It promotes supporting and improving existing community facilities and increasing the number of households living in accessible locations, which should have beneficial effects for this SA Objective.
- 6.2.30 The whole focus of the Transport and Accessibility Strategy is to improve accessibility to services and facilities for all ages across the District; by prioritising strategic transport infrastructure and improvements to the public transport network and the development of safe pedestrian and cycle routes the strategy is making transport inclusive for all.

Encourage and facilitate increased engagement in cultural and leisure activities

6.2.31 The Strategy for Battle has been judged to give rise to significant beneficial effects for increased engagement in cultural and leisure activities. By promoting growth in sustainable tourism, which largely focuses on the historical, cultural assets of the town, the strategy is helping to encourage and facilitate increased engagement in cultural activities. The reference to community infrastructure and leisure and health facilities in the strategy indicates clear direction in improving these facilities within the town. A number of the strategies have been assessed as having minor beneficial effects, which cumulatively could have significant effects this will be dealt with later in this document.

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

6.2.32 There is a level of uncertainty in predicting the effects of the strategies on the prudent use of natural resources due to actual locations for development linked to certain strategies (including Rye and the Economy) not having been determined at this stage.

6.2.33 The general Strategy for the Distribution of Development has clear direction for making the most effective and efficient use of land, prioritising previously developed land; however the significance of beneficial effects may reduce over time as previously developed land and infill opportunities become scarcer.

6.2.34 The Strategy for the Environment makes clear the requirement for minimising the environmental impact of new development, which should ensure the prudent use of natural resources including land. The strategy also makes provision for the general protection and enhancement of natural resources through its component parts including biodiversity, design quality and landscape stewardship.

6.2.35 Minor adverse effects becoming significant over time have been identified for the Strategy for Bexhill. Opportunities within the town may be developed prior to the strategic sites due to infrastructure constraints associated with the strategic sites; therefore in the shorter term efficient use of land is likely with the focus on development within the town. In the longer term the development of greenfield and prime agricultural sites may not be seen as efficient or necessarily prudent use of land resources.

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

- 6.2.36 There is a clear direction in the Strategy for Battle to reduce congestion and car usage in the town, which should improve air quality in the town centre. The strategy aims to achieve this through appropriate siting of new development to reduce the need to travel across town and by improving cross-town transport services and improving rail connections to Tunbridge Wells, Hastings and London. Therefore the strategy has been assessed as making a significant contribution to reducing road congestion and ensuring air quality continues to improve.
- 6.2.37 The Strategy for Transport and Accessibility has been judged to have a minor beneficial effect for this SA Objective in the short to medium term with beneficial effects becoming more significant over time. The strategy is contributing to increasing travel choice by non-car modes and aims to reduce road congestion by improving the strategic transport infrastructure within the District. The effects improve over time as the individual improvements come on stream. As congestion reduces local air quality should improve.
- 6.2.38 It is not thought that the Strategy for the Economy would contribute to reducing congestion or air pollution. The encouragement of new enterprise and business into the District and facilitating the growth of 'home-grown' businesses is likely to put more pressure on the road transport system and increase traffic movements within the District. Certain aspects of the strategy have some mitigating qualities: encouraging working from home; the promotion of sustainable tourism; the commensurate provision of business sites and premises to match workforce growth to reduce reliance on out-commuting. Therefore the effects have been judged as minor adverse with potential for becoming more significant over time depending on the economic 'step change' achieved by the implementation of the Core Strategy.

Reduce emissions of Greenhouse gases

- 6.2.39 The Strategy for the Distribution of Development is not likely to reduce greenhouse gas emissions as it has a strong development focus. An increase in the number of households and businesses in the District has the potential for a significant adverse effect on reducing greenhouse gas emissions. Other areas of policy (cross-cutting) will help to ensure sustainable construction which should limit the generation of new greenhouse gas emissions.
- 6.2.40 The level of growth planned through the Strategy for Bexhill will increase the number of households in the area and this will generate additional greenhouse gas emissions through heating homes, additional car trips and waste generation. In the longer term the new Link Road will also attract new car and lorry movements that will generate greenhouse gas emissions. It is therefore judged that the Strategy for Bexhill will have adverse effects for this SA Objective which may become significant over time.

6.2.41 The development proposed by the Strategy for the Rural Areas and the strong support for growth in the rural economy would not be likely to reduce greenhouse gas emissions. The rural areas are less well served by public transport and have higher car ownership and use. Growth in the rural economy would inevitably involve additional transport movements including cars, agricultural vehicles and heavy goods vehicles.

6.2.42 The Strategy for the Economy promotes an increase in economic activity in the District, new employment land and new and growing businesses in the District, which will not reduce greenhouse gas emissions. The effects have been judged to be minor adverse becoming more significant over time as 'economic step-change' is realised.

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

6.2.43 There are uncertainties for the effects on this SA Objective linked to the Strategies for Rye and the Economy. Whilst the Strategy for Rye gives full recognition to future sea-level rise and flood risk, it concentrates on defending Rye to recognised standards but does not couple this with total avoidance of the floodplain. Rock Channel and Rye Harbour sited in the strategy are both within Flood Zone 3. Areas of search for additional housing allocations are known to be outside of major flood risk areas.

6.2.44 The location of new employment land is not identified within the Strategy for the Economy and could therefore involve development on areas of land at risk from flooding. Employment uses are considered to be less vulnerable than residential uses in flood risk terms, however land should still be prioritised and development allocated sequentially according to flood risk.

6.2.45 The Strategy for the Environment should produce significant beneficial effects for this SA Objective. There is explicit reference in point (f) to identifying and reducing flood risk to people and property and the SFRA will guide in this process.

Maintain, improve and manage water resources in a sustainable way

6.2.46 The level of development proposed through the Bexhill Strategy will undoubtedly require additional water supply and wastewater infrastructure to meet the demand arising. Managing demand involves encouraging installation of water conservation measures such as low flow taps, showers, low flush toilets and water butts. Even with mitigation in place this strategy has the potential for significant adverse

effects on improving the management of water resources. The Strategy has been assessed as having uncertain effects on this SA Objective as information on the implementation of such significant growth is not found within the strategy.

- 6.2.47 The sustainable management of water is fundamental in achieving sustainable development and the Strategy for the Environment sets the requirement to minimise water use. The SFRA will guide the potential for the implementation of Sustainable Drainage Systems (SuDS) under the Environment Strategy, which will help reduce surface water run-off. This should have significant beneficial effects for improving the sustainable management of water resources.

Conserve and enhance biodiversity

- 6.2.48 The Strategy for the Distribution of Development requires accordance with the levels of development set out in the South East Plan. Overall quantities of development proposed by the South East Plan for the District are likely to result in a net loss of biodiversity. This is because inevitably there will be development other than redevelopment and infill, which may require substantial greenfield land take over the Plan period.

- 6.2.49 The strategic sites for major growth around Bexhill consist of greenfield land which has a biodiversity value that will be lost. The Strategy for Bexhill has some beneficial aspects for biodiversity including the multifunctional greenspace associated with the urban fringe; however much of the proposed open space is to be managed for public enjoyment and not necessarily purely for its biodiversity value. The overall effects of the Strategy for Bexhill on the SA Objective to conserve and enhance biodiversity are judged to be adverse becoming significant over time.

- 6.2.50 Priority habitats have been promoted by the Strategy for the Environment for enhancement and protection and the Strategy promotes commitment to identifying a strategic greenspace network. The effects are therefore judged to be beneficial with potential for significant beneficial effects.

Protect and enhance the high quality natural and built environment

- 6.2.51 The Strategy for Battle is clearly concerned with maintaining the essential physical form and character of the town and its setting within the AONB and in relation to Hastings by ensuring the retention of the strategic gap. This Strategy is therefore assessed as having potentially significant beneficial effects for this SA Objective.

- 6.2.52 Within the Strategy for the Rural Areas there is a strong focus on the protection and enhancement of the local character and distinctiveness of the rural area including the AONB. Strategy points e) and f) specifically address this through the protection of locally distinctive buildings and features which contribute positively to the countryside and particular reference to the conservation and enhancement of the natural beauty and historic landscape context of the AONB. This Strategy should therefore have significant beneficial effects for the protection and enhancement of the built and natural environment.
- 6.2.53 The Strategy for the Environment leads with the management of the high quality built and natural landscape character and seeks to place high quality design centrally in the planning process. This should have significant beneficial effects for this SA Objective.
- 6.2.54 There is uncertainty surrounding the effects of the Strategy for the Economy on the SA Objective to protect and enhance the built and natural environment. The appearance of business/industrial parks and employment sites can often jar with the surrounding landscape and great care should be taken in the siting of new employment areas. Other cross-cutting policy on design should protect and help enhance the high quality built and natural environment.

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

- 6.2.55 The Strategy for the Distribution of Development is assessed as having potentially significant adverse effects on the SA Objective to reduce waste generation. Even with the highest levels of sustainable construction and most effective development distribution patterns the level of development required will ultimately result in increased numbers of households and businesses and consequently increased waste generation. Need to ensure sustainable waste management within design of new developments to increase recycling and composting rates.
- 6.2.56 The Strategy for Bexhill also has potential for significant adverse effects on this Objective due to its strategic growth requirements. Increasing the number of households and businesses in the area will increase the amount of waste generated; furthermore the construction of new development will generate significant waste as will the construction of the Link Road.
- 6.2.57 The remaining spatial strategies alongside the Strategy for the Economy have been individually judged to have adverse effects on reducing waste generation, which cumulatively may become significant; this will be addressed later in this document.

6.2.58 The Strategy for the Environment includes the requirement to minimise environmental impacts of development including minimising waste generation. Achieving sustainable development requires the consideration of waste issues and implementation of site waste management plans which monitor and set targets for waste in order to promote resource efficiency.

Cumulative and Synergistic Effects

6.2.59 Table 6.2 below documents the cumulative and synergistic effects of the Preferred Strategies. Where the Strategies have been qualified by 'minor' in brackets the effects are less significant but are contributing to cumulative and synergistic effects.

Table 6.2 *Cumulative and Synergistic Effects of the Plan Strategies*

SA Objective	Assessment			Plan Strategies
	Short	Medium	Long Term	
Ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	✓	✓	✓	Provision: <ul style="list-style-type: none"> • Distribution • Bexhill • Battle (minor) • Rye (minor) • Rural Areas (minor) • Communities • Delivery (minor) Affordability: <ul style="list-style-type: none"> • Communities Sustainably Constructed: <ul style="list-style-type: none"> • Environment • Delivery (minor)
Improve the health and well-being of the population and reduce inequalities in health	(✓)	✓	✓	<ul style="list-style-type: none"> • Distribution • Bexhill • Rye (minor) • Rural Areas (minor) • Communities • Environment (minor) • Transport (minor) • Delivery (minor)
Reduce crime and the fear of crime	~	(✓)	(✓)	<ul style="list-style-type: none"> • Communities • Transport (minor) • Delivery (minor)
Reduce deprivation and social exclusion	(✓)	(✓)	✓	<ul style="list-style-type: none"> • Distribution (minor) • Bexhill (minor) • Battle (minor) • Rye (minor) • Rural (minor) • Economy • Transport (minor)

				<ul style="list-style-type: none"> • Delivery (minor)
Raise educational achievement levels and develop the opportunities for lifelong learning	(✓)	(✓)	✓	<ul style="list-style-type: none"> • Bexhill (minor) • Battle • Rye (minor) • Rural (minor) • Economy • Delivery (minor)
Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	✓	✓	✓	<ul style="list-style-type: none"> • Distribution • Bexhill • Battle • Rye • Rural Areas • Economy • Environment (minor) • Transport • Delivery (minor)
Improve accessibility to services and facilities for all ages across the District	(✓)	(✓)	✓	<ul style="list-style-type: none"> • Distribution (minor) • Bexhill • Battle • Rye (minor) • Rural Areas • Transport • Delivery (minor)
Encourage and facilitate increased engagement in cultural and leisure activities	~	(✓)	(✓)	<ul style="list-style-type: none"> • Bexhill (minor) • Battle • Rye (minor) • Rural Areas (minor) • Communities (minor) • Environment (minor) • Transport (minor) • Delivery (minor)
Improve efficiency in land use and encourage the prudent use of natural resources	(✓)	(✓)	?	<ul style="list-style-type: none"> • Distribution • Rural Areas (minor) • Environment • Transport (minor) • Delivery (minor) • Battle (minor) • Rye (uncertain) • Economy (uncertain) • Bexhill (minor adverse)
Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	?	?	?	<ul style="list-style-type: none"> • Distribution (minor adverse) • Bexhill (minor beneficial) • Battle (beneficial) • Rural Areas (minor adverse) • Economy (minor adverse) • Transport (minor beneficial) • Delivery (minor beneficial)
Reduce emissions of Greenhouse gases	(X)	(X)	X	<ul style="list-style-type: none"> • Distribution (adverse) • Bexhill (minor adverse) • Battle (minor adverse)

				<ul style="list-style-type: none"> • Rye (minor adverse) • Rural Areas (minor adverse) • Economy (minor adverse) • Environment (beneficial) • Transport (minor beneficial) • Delivery (minor beneficial)
Minimise the risk of flooding and resulting detriment to people and property	?	?	?	<ul style="list-style-type: none"> • Rye (uncertain effects) • Economy (uncertain effects) • Environment (beneficial) • Delivery (minor beneficial)
Maintain, improve and manage water resources in a sustainable way	(✓)	(✓)	?	<ul style="list-style-type: none"> • Bexhill (uncertain) • Environment (beneficial) • Delivery (minor beneficial)
Conserve and enhance biodiversity	?	(X)	(X)	<ul style="list-style-type: none"> • Distribution (adverse) • Bexhill (minor adverse) • Battle (uncertain) • Rye (uncertain) • Rural Areas (minor beneficial) • Economy (uncertain) • Environment (beneficial) • Delivery (minor beneficial)
Protect and enhance the high quality natural and built environment	✓	✓	✓	<ul style="list-style-type: none"> • Battle (beneficial) • Rye (minor beneficial) • Rural Areas (beneficial) • Economy (uncertain) • Environment (beneficial) • Transport (minor beneficial) • Delivery (minor beneficial)
Reduce waste generation and disposal, and achieve the sustainable management of waste	(X)	X	X	<ul style="list-style-type: none"> • Distribution (adverse) • Bexhill (adverse) • Battle (minor adverse) • Rye (minor adverse) • Rural Areas (minor adverse) • Economy (minor adverse) • Environment (minor beneficial)

6.2.60 The strategies address the majority of SA Objectives in a positive, supportive manner and contribute to the achievement of them. However, there are three SA Objectives that could suffer from cumulative, potentially adverse effects from the implementation of the Core Strategy Spatial and Thematic Strategies, these being:

- Reduce emissions of Greenhouse gases
- Conserve and enhance biodiversity
- Reduce waste generation and disposal, and achieve the sustainable management of waste

6.2.61 There are two further SA Objectives for which the predicted cumulative and synergistic effects are uncertain. As more detail is provided in the policy directions that lead on from the strategies the effects should become clearer. The uncertainties surround the following SA Objectives:

- Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage
- Minimise the risk of flooding and resulting detriment to people and property

6.2.62 It is true to say that where an SA Objective has several clauses the Strategies can go further in addressing some components of the Objective more than others. For example, the SA Objective to ensure everyone has the opportunity to live in a decent, sustainably constructed and affordable home has several components: housing provision; affordability of housing; decentness in terms of quality; and a requirement to be sustainably constructed. To further this example, the Strategy for the Environment can address two components, the quality in terms of design and sustainable construction, but cannot address overall provision or affordability.

6.2.63 Another example of multiple components is the SA Objective for waste: one aspect deals with reducing waste generation and the other deals with achieving sustainable management of waste. Various Strategies have an adverse effect on reducing waste generation but can, albeit in some instances with an element of mitigation, contribute to achieving sustainable management of waste, for example, through improved design to include recycling and composting facilities, requirements for waste management plans and requirements for minimising construction waste.

6.2.64 Reducing road congestion may be achievable through certain strategies but this would not necessarily ensure air quality in the District as a whole continues to improve. This may be because over time new roads and linkages that initially relieve congestion have the effect, in combination with new development, of generating traffic and increasing overall car levels in the District and consequently air pollution. Strategies that aim to improve economic growth including within the tourism sector are likely to bring more traffic into the District, which due to road improvements, may not contribute to congestion but would contribute to overall emissions and pollution levels.

6.2.65 Similarly increasing travel choice may not result in reduced car usage given the habits and propensity of car use of people living in rural areas. Whilst a strategy can influence the availability of alternative forms of transport thereby facilitating more sustainable modes of

transport than the car, a strategy cannot necessarily make people change their habitual arrangements.

7 PROPOSED MITIGATION MEASURES

7.1 Introduction

7.1.1 This chapter, 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 Strategies. Mitigation measures can also include recommendation for enhancing the beneficial effects of strategies. Mitigation measures are wide-ranging and can include:

- Changes to the DPD as a whole by bringing forward new strategies or deleting strategy elements
- Refining strategies by strengthening criteria contained within
- Technical measures

7.1.2 The following table (Table 7.1) documents the mitigation measures identified through the assessment matrices exercise. They have been identified per Strategy and will be considered by the Council through the consultation process.

Table 7.1 *Proposed Mitigation Measures*

Strategy	Proposed Mitigation Measures
Overall Development Strategy for Distribution of Development up to 2026	Consider addressing: <ul style="list-style-type: none">• social exclusion in relation to the siting and phasing of new infrastructure and housing• accessibility directly in the strategy to ensure healthy and sustainable modes of transport are highlighted• sustainable construction in overall strategy so underpins whole of the Core Strategy (as in the South East Plan) – this can address emissions, waste, water resource issues, flooding and biodiversity in one statement on sustainable construction• cultural and leisure element other than public enjoyment of the countryside; District has rich and diverse cultural heritage
Bexhill	Consider addressing: <ul style="list-style-type: none">• Biodiversity loss and how ecological gains can be achieved through the strategy (green infrastructure; habitat restoration/creation)• Infrastructure requirements for strategic sites other than transport capacity - particularly water supply and wastewater treatment and waste management infrastructure
Battle	Consider: <ul style="list-style-type: none">• Clearly relating how the level of proposed housing provision will serve local needs

	<ul style="list-style-type: none"> • Providing a clearer indication of the areas of search within and outside the development boundary • How the strategy could improve health in terms of new health facilities and improved leisure opportunities including open space and public rights of way and simultaneously promote social inclusion • Whether the strategy could be more explicit in identifying the cultural importance of Battle and how it aims to increase engagement in cultural activities through growth in sustainable tourism for example
Rye and Rye Harbour	<p>Consider:</p> <ul style="list-style-type: none"> • Clearly relating how the level of proposed housing provision will serve local needs – add housing to the sentence “focus on improving local social (housing) and economic conditions” • Adding the word archaeological in relation to national heritage, for example: Rye should continue to be recognised as an important part of the national heritage for its built, natural and archaeological environments. • Identifying the areas of search in relation to considerable constraints referred to. • Mentioning reducing congestion in relation to access and road and rail improvements.
Rural Areas	<p>Consider:</p> <ul style="list-style-type: none"> • Adding health facilities to point b) in Strategy for Villages • Making reference to cultural assets • How improved access arrangements will directly improve health inequalities and promote social inclusion
Communities	<p>Consider:</p> <ul style="list-style-type: none"> • Including other community facilities such as village halls, community centres and libraries that are not deemed to be included recreational in terms of promoting active lifestyles • Including cultural facilities • Whether strategy can address social exclusion
Economic Development	<p>Consider:</p> <ul style="list-style-type: none"> • Adding reference to the rural economy, including land-based industries and agriculture • Stating how best use will be made of existing employment land and premises, increasing efficiency of employment sites, diversification of uses to retain functioning business space
Environment	<p>Consider:</p> <ul style="list-style-type: none"> • Clarifying what counts as priority habitat • Including the protection of water resources
Transport and	No mitigation is proposed at this time. Other Strategy and Policy areas should help deliver mitigation against

Accessibility	adverse environmental effects; strategic transport infrastructure is lacking within the District and this is helping to limit the economic potential of the District, it is a goal in the South East Plan to regenerate the coastal towns and improve general prosperity within the District and therefore it is not considered appropriate to weaken the strategy focus on providing strategic transport improvements.
Delivery of development	No mitigation is proposed at this time.

7.1.3 Due to the iterative nature of the process of plan preparation and SA, some of the mitigation measures proposed in the above table have already been implemented through the detail now added to the strategies on how the strategy elements will be achieved.

7.2 Uncertainties and Risks

7.2.1 Sustainability Appraisal is an inherently uncertain process that involves making predictions concerning environmental and sustainability conditions on the basis of often limited or inadequate data. Most of the impact predictions made in this report are, therefore, subject to uncertainty and entail risks.

7.2.2 Such risks cannot be avoided but measures to reduce or contain them can be taken during the monitoring phase of the Sustainability Appraisal. Where impacts are uncertain and/or the risk of negative/adverse effects is significant, recommendations are made for monitoring the implementation of the DPD. These are listed in Chapter 8.

7.2.3 The key uncertainties identified are as follows:

- Incomplete / unavailable baseline data in SA scoping
- Strategic nature of the plan identifies broad areas for development and therefore assumptions have been made regarding the assessment; detailed site-appraisal of successive plans would be required to increase the accuracy of the SA predictions
- The true nature of cumulative and synergistic effects will only become apparent as the plan period progresses when the interaction of the policies is underway, and the construction of developments and roads have taken place
- The Strategies are not worded as policy at this stage and may not necessarily constitute the actual policies, which currently flow from them.

7.2.4 It would be appropriate to handle uncertainties by monitoring them where possible in the SA Framework.

8 IMPLEMENTATION

8.1 Introduction

- 8.1.1 This chapter examines the links with other plans and programmes and the monitoring proposals.
- 8.1.2 Monitoring allows the identification of the actual significant environmental effects of implementing the plan, which can be compared to those predicted. Unforeseen effects can be identified and future predictions made more accurately. Monitoring needs to consider both adverse and beneficial effects and must be clearly linked to the SA process.

8.2 Links to other tiers of plans and programmes and the project Level

- 8.2.1 The Core Strategy Policy Directions document makes reference to a number of LDDs both existing and subsequent. The Council is currently revising its LDS and developing a list of documents that will be incorporated into the LDF. Specifically the SA has identified links between certain strategies and such LDDs:
- Site Allocations (future) DPD linked to the following strategies:
 - Distribution
 - Bexhill
 - Battle
 - Rye
 - Rural Areas
 - North East Bexhill 'Masterplan' Draft SPD linked to the following strategy:
 - Bexhill
 - Transport and Accessibility
 - Economy
 - Affordable Housing SPD (Adopted) linked to the following strategies:
 - Communities
 - Rock Channel Development Brief Draft SPD linked to the following strategy:
 - Rye and Rye Harbour
 - Developer Contributions SPD linked to the following strategies:
 - Transport and Accessibility
 - Economy (with respect to education)
 - Environment (with respect to open and green space provision and habitat mitigation)

8.3 Proposals for Monitoring

8.3.1 Monitoring helps to verify whether plans are achieving their objectives particularly concerning sustainable development or whether they may have had unintended consequences. The SEA Directive specifically requires monitoring to identify unforeseen adverse effects and to enable appropriate remedial action to be taken.

8.3.2 The Government's *Local Development Framework Monitoring: A Good Practice Guide* (published in March 2005) says the following:

"Monitoring is essential to establish what is happening now, what may happen in the future and then compare these trends against existing policies and targets to determine what needs to be done. Monitoring helps to address questions like:

- *Are policies achieving their objectives and in particular are they delivering sustainable development?*
- *Have policies had unintended consequences?*
- *Are the assumptions and objectives behind policies still relevant?*
- *Are the targets being achieved?*

8.3.3 The variables in Table 8.1 could form part of the SA Monitoring Framework, which will be produced before the Council adopts the Core Strategy DPD.

Table 8.1 *Proposed Monitoring*

Priority	Targets
ENVIRONMENT	
Recycling of waste	National targets for reuse, recycling, composting 40% by 2010, 45% by 2015 and 50% by 2020 The South East region has a target to recycle or compost 50% of all waste by 2010
Built Environment	Up to date Conservation Area Appraisals for all Conservation Areas.
	Reduce the number of entries on the English Heritage At Risk Register
Biodiversity	No loss in the area of semi-natural ancient woodland
	Improvement in the condition of SSSIs – Government target 95% favourable or unfavourable recovering
Landscape Quality	Landscape Character Assessment for the District
Climate Change	The UK's Kyoto target is to lower greenhouse gas emissions 12.5% below 1990 levels by year end 2012

	No increase in the number of properties at risk from flooding
	No permissions granted contrary to EA advice on flood grounds
Water Quality	Improve bathing quality at beaches Camber, Bexhill and Normans Bay to standard 1
	The objectives of the Water Framework Directive include the aim to achieve 'good chemical status' for surface water bodies and groundwater by 2015
Air Quality	Reduce car use for travel to work
	Maintain air quality within UK Strategy for Air Quality targets
Prudent Use of Natural Resources	Reduce water use to 130 litres/head/day (l/h/d) by 2030 and reduce water use to 125 l/h/d in new homes from 2009 (DEFRA Water Strategy Feb 2008)
	RSS target of 60% of all new development across the region on previously developed land (in line with national target)
SOCIAL	
Community Safety	25% reduction target in theft from vehicles 23% reduction target in domestic burglaries (ESCC targets linked to national performance indicators)
Children and Young People	Reduce child poverty in the District (particular problem areas within Rye and Bexhill in top 20% most deprived in the country)
Culture and Leisure	Target 50% by 2009 satisfaction with theatres and concert halls
	Target of 60% in 2009 and 65% in 2010 satisfaction with sport and leisure facilities
Health	Each Health Authority Area by 2010 to reduce by at least 10% the gap between the quintile of areas with the lowest life expectancy at birth and the population as a whole (The National Health Inequalities Targets)
Housing	Housing completions target of 280 per annum minima
	Government target of 40% of completions annually to be affordable
	Government target to cut the number of households living in temporary accommodation by half by 2010
Deprivation	Government target to eradicate fuel poverty in vulnerable homes by 2010 and all homes by 2016
	Reduce child poverty in the District
	Target to see an improvement in the IMD score

Transport and Accessibility	Improve the percentage of new development within 30 minutes public transport of facilities and services
	ESCC target to have at least 59% of Public Rights of Way signposted and easy to use 2007/2008 (not currently meeting target 51.1% 2007/08 – survey based upon 5% of total length)
ECONOMIC	
Education and Skills	Department for Innovation Universities and Skills has the following targets for adult education and skills: <ul style="list-style-type: none"> • 95% of adults should have functional literacy and numeracy skills • over 90% of adults should be qualified to at least Level 2
	The Learning and Skills Council is aiming for at least 90% of 16-18 year olds to be participating in some kind of formal learning by 2015.
Jobs	Improve GVA per person to align more with regional average
	Reduce unemployment
Local Economy & Regeneration	Increase business start ups and improve annual percentage change in stock
	To increase the number of VAT registered businesses to 3200 by 2009 (Rother Action Plan)

APPENDICES

APPENDIX 1 SA FRAMEWORK & BASELINE INDICATORS

Sustainability Appraisal Framework for the Assessment of the Rother Core Strategy

(Explanatory Note: The SA Framework (the SA Objectives collectively) seeks to progress the development of vibrant sustainable communities and therefore there is no single objective to “create and sustain vibrant communities”, it is considered that all the objectives work together to deliver this vision.)

	SA Objective To:	Decision-Aiding Questions	Indicators	Data source
SEA Directive topics: Population, Human Health				
1	Ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	Does the option/policy <ul style="list-style-type: none"> • Deliver affordable, sustainable housing in both urban and rural, in keeping with local character • Support sympathetic accommodation of housing growth in sustainable locations • Balance housing delivery with community facilities and environmental capacity • Provide for an appropriate mix and range of housing 	<ul style="list-style-type: none"> • Average property price : earnings ratio • % of affordable units annually • Number of completions • Number households on housing register • Total homeless in priority need 	<ul style="list-style-type: none"> • APP & AMR • APP & AMR • AMR • ESiF • ESiF
SEA Directive topics: Human Health				
2	Improve the health and well-being of the population and reduce inequalities in health	Does the option/policy: <ul style="list-style-type: none"> • Increase accessibility to health facilities • Protect & increase provision of and access to leisure including open space and cultural activities • Increase or improve PRoW network 	<ul style="list-style-type: none"> • Life expectancy • Percentage of people with limiting long term illness • % new development within 20 minutes of sports facilities 	<ul style="list-style-type: none"> • ESiF • ESiF • ESiF
3	Reduce crime and the fear of crime	Does the option/policy: <ul style="list-style-type: none"> • Reduce actual levels of crime • Reduce fear of crime 	<ul style="list-style-type: none"> • Recorded crime rates(by type) in Rother • % residents that feel fairly or very safe 	<ul style="list-style-type: none"> • ESiF • ESiF
SEA Directive topics: Population, Human Health				

	SA Objective To:	Decision-Aiding Questions	Indicators	Data source
4	Reduce deprivation and social exclusion	Does the option/policy: <ul style="list-style-type: none"> • Reduce poverty and social exclusion in those areas most affected • Reduce the number of children living in poverty • Reduce the number of households in fuel poverty 	<ul style="list-style-type: none"> • % households in fuel poverty • % working population claiming benefits • Indices of multiple deprivation • Mean household income 	<ul style="list-style-type: none"> • RDC • ESiF • ESiF • ESiF
5	Raise educational achievement levels and develop the opportunities for lifelong learning	Does the option/policy: <ul style="list-style-type: none"> • Increase the numbers of school-leavers achieving GCSE passes • Increase numbers undertaking further and higher education • Enhance opportunities for adult education 	<ul style="list-style-type: none"> • % pupils achieving Level 4 at Key stage 2 • % students 16+ in full time education • % working age population with no qualifications 	<ul style="list-style-type: none"> • ESiF • ESiF • ESiF
6	Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	Does the option/policy: <ul style="list-style-type: none"> • Stimulate economic revival in priority regeneration areas • Provide a diverse range of jobs that meets local needs • Support the rural economy • Ensure the correct mix of skills to meet the current and future needs of local employers • Encourage the development of a buoyant, sustainable tourism sector • Increase provision of better quality jobs / skilled employment? 	<ul style="list-style-type: none"> • % long term unemployed • unemployment as % of population • GVA per person • Business start up and closures • Loss of employment land to retail • Permissions for B class uses • Tourism business turnover 	<ul style="list-style-type: none"> • ESiF • ESiF • ESiF / RDC • ESiF • AMR • ESiF • Tourism SE Survey
SEA Directive Topics: Population, Material Assets, Air, Climate Factors				
7	Improve accessibility to services and facilities for all ages across the District	Does the option/policy: <ul style="list-style-type: none"> • improve accessibility in the rural areas of the District • Support delivery of quality public transport 	<ul style="list-style-type: none"> • % new development within 30 minutes public transport of services and facilities • % completed retail, office & leisure 	<ul style="list-style-type: none"> • AMR

	SA Objective To:	Decision-Aiding Questions	Indicators	Data source
		<ul style="list-style-type: none"> Enhance the PRoW and cycle network Support the timely delivery of infrastructure needs associated with new development Encourage the provision of services and facilities in accessible locations 	development in town centres	<ul style="list-style-type: none"> AMR
SEA Directive topics: Human Health, Cultural Heritage				
8	Encourage and facilitate increased engagement in cultural and leisure activities	Does the option/policy: <ul style="list-style-type: none"> Improve accessibility to cultural and leisure activities Increase the number of cultural enterprises / organisations in the District 	<ul style="list-style-type: none"> Satisfaction with sport & leisure facilities? Satisfaction with theatres & galleries Visits to museums in Rother per 1000 population 	<ul style="list-style-type: none"> APP APP APP
SEA Directive topics: Material Assets, Air, Climatic Factors, Biodiversity, Soil				
9	Improve efficiency in land use and encourage the prudent use of natural resources	Does the option policy: <ul style="list-style-type: none"> Use land that has been previously developed in preference to Greenfield Re-use buildings and materials Protect and enhance the best and most versatile agricultural land 	<ul style="list-style-type: none"> % development on previously developed land vacant private sector dwellings returned to occupancy 	<ul style="list-style-type: none"> APP/AMR APP
SEA Directive Topics: Air, Climatic Factors, Material Assets, Human Health				
10	Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	Does the option/policy: <ul style="list-style-type: none"> Improve air quality Improve travel choice Reduce the need for travel by car / lorry Reduce the need to travel for commuting 	<ul style="list-style-type: none"> Background levels of air pollutants Number of AQMAs Commuting patterns in/out District Mode of travel to work % PRoW signposted & easy to use 	<ul style="list-style-type: none"> ESiF/RDC DfT website ESiF ESiF ES Council Plan
SEA Directive Topics: Climatic Factors, Material Assets				
11	Reduce emissions of	Does the option/policy:	<ul style="list-style-type: none"> Emissions of greenhouse gases 	<ul style="list-style-type: none"> ESiF

	SA Objective To:	Decision-Aiding Questions	Indicators	Data source
	Greenhouse gases	<ul style="list-style-type: none"> • Reduce emissions through reduced travel, energy consumption • Promote renewable energy generation • Promote community involvement, understanding & action on climate change 	<ul style="list-style-type: none"> • % new development with renewable energy generation • Applications received for renewable energy on existing development 	<ul style="list-style-type: none"> • RDC • RDC
SEA Directive Topics: Climatic Factors, Material Assets, Water, Human Health				
12	Minimise the risk of flooding and resulting detriment to people and property	Does the option/policy: <ul style="list-style-type: none"> • Reduce the proportion of properties at risk of flooding in the District • Promote adoption and use of SuDS 	<ul style="list-style-type: none"> • Properties at risk from flooding • Planning permissions granted contrary to EA advice on flood defence grounds 	<ul style="list-style-type: none"> • SFRA / EA • AMR
SEA Directive Topics: Water, Human Health, Material Assets				
13	Maintain, improve and manage water resources in a sustainable way	Does the option/policy: <ul style="list-style-type: none"> • Protect & improve water quality • Require the use of water efficiency measures • Minimise the risk of pollution to water sources 	<ul style="list-style-type: none"> • Water consumption per capita • Quality of river water chemical and biological water quality • Bathing quality at beaches 	<ul style="list-style-type: none"> • ESiF • ESiF • ESiF
SEA Directive topics: Biodiversity, Flora, Fauna				
14	Conserve and enhance biodiversity	Does the option/policy: <ul style="list-style-type: none"> • Protect and enhance designated and locally valued habitats and species • Prevent and reverse habitat fragmentation • Provide opportunities for provision & enhancement of green space 	<ul style="list-style-type: none"> • Number & area designated sites • Condition of designated sites including SSSI in favourable or unfavourable recovering • Number of SNCIs • Area of ancient semi-natural woodland 	<ul style="list-style-type: none"> • AMR/ESiF • AMR • AMR • Natural England
SEA Directive Topics: Landscape, Cultural Heritage, Soils				

	SA Objective To:	Decision-Aiding Questions	Indicators	Data source
15	Protect and enhance the high quality natural and built environment	Does the option/policy: <ul style="list-style-type: none"> • Ensure protection and enhancement of the AONB • Protect or enhance sites & features of historical, archaeological, or cultural interest (including conservation areas, listed buildings, registered parks and gardens and scheduled monuments) • Minimise adverse impact on landscape setting of towns and rural settlements 	<ul style="list-style-type: none"> • Number of Conservation Areas • Buildings of Grade I and II* at risk • Number of listed buildings 	<ul style="list-style-type: none"> • RDC • EH Register • RDC/EH
SEA Directive Topics: Material Assets				
16	Reduce waste generation and disposal, and achieve the sustainable management of waste	Does the option/policy: <ul style="list-style-type: none"> • Help reduce waste and facilitate recycling in construction and operation • Encourage composting • Encourage development self-sufficient in waste management • Support recovery of energy from waste 	<ul style="list-style-type: none"> • % of recycled household waste • Waste collected per person (kg) and % change in household waste collected per year • % household waste composted • % household waste landfilled 	<ul style="list-style-type: none"> • APP • APP • APP • APP

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APPENDIX 2 DPD OBJECTIVES APPRAISAL

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Strategic cross-cutting objectives

Communities

CO1 To continue to support, and further develop, vibrant, safe, balanced and inclusive communities

- 1.1 To develop community life including support networks
- 1.2 To promote healthy, active lifestyles
- 1.3 To provide housing in a way that supports local priorities and provides choice, including for affordable housing
- 1.4 To support older people, particularly to live independently
- 1.5 To be more attractive to the young as a place to live
- 1.6 To maintain low crime levels and improve the feeling of safety across the district

Environment

CO2 To maintain the high quality and improve the long term stewardship of the natural and built environment, with full regard to potential future consequences of climate change

- 2.1 To place greater emphasis on design quality in all development
- 2.2 To conserve, where appropriate enhance, and manage the high quality ecological and landscape resources including the historic built environment
- 2.3 To protect communities from flooding and effectively manage risk
- 2.4 To minimise carbon emissions, including through greater use of renewable energies
- 2.5 To improve air quality
- 2.6 To encourage and support efficient use of resources including land, water and energy

Economy

CO3 To secure sustainable economic growth for existing and future residents, and provide greater prosperity for all

- 3.1 To raise aspirations and increase educational attainment
- 3.2 To increase skill levels
- 3.3 To increase the business base and overall productivity
- 3.4 To expand the range of job opportunities
- 3.5 To improve the balance of homes and jobs
- 3.6 To increase local earnings relative to living costs

Accessibility

CO4 To provide a higher level of access to jobs and services for all ages and in both urban and rural areas and improve connectivity with the rest of the region

- 4.1 To increase the potential for travel by more sustainable modes
- 4.2 To provide effective access to health, recreation and social services for all
- 4.3 To ensure that transport infrastructure is 'fit for purpose', both in terms of its capacity to serve both existing and new development and to support economic objectives

Implementation

CO5 To ensure effective and timely delivery of development and infrastructure in line with the overall strategy

- 5.1 To provide a continuity of housing and business land and premises
- 5.2 To provide a framework for development contributions to infrastructure required to achieve the objectives
- 5.3 To integrate infrastructure programmes, working closely with key agencies
- 5.4 To provide contingencies based on a risk assessment

Scoring criteria



Compatible



Possible Conflict



Neutral



Uncertain or unknown

Matrix for Comparing Plan Objectives against SA Objectives

SA Objectives	CO1	CO2	CO3	CO4	CO5
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 the 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	?	✓	?	~	?

Commentary

- CO1** Plan Objective is supportive of the social SA Objectives, which collectively deal with inclusiveness, safety, health and components that contribute to achieving vibrant communities. Uncertainty as to whether this Plan Objective will positively contribute to reducing greenhouse emissions as there will be a need to provide housing and attract people to further develop communities. Equally it is uncertain whether the provision of housing, services and facilities required under this Plan Objective would be able to contribute to reducing waste generation – though there is scope for achieving the sustainable management of waste.
- CO2** Plan Objective is compatible with the environmental SA Objectives that deal with the sustainable management of natural resources including land, water and biodiversity, the SA Objective to protect and enhance the natural and built environment and the SA Objective to reduce waste generation.
- CO3** Plan Objective is supportive of the economic SA Objectives, the objective to reduce deprivation and social exclusion and the need to improve accessibility to facilities. There is uncertainty whether the level of economic growth, to provide greater prosperity for all, proposed by this objective would contribute to reducing greenhouse gas emissions or conflict with this SA Objective. The same can be said of the compatibility of this Plan Objective with the SA Objective to reduce waste generation – though sustainable waste management could be achieved.
- CO4** Plan Objective is supportive of the SA Objectives concerned with health and well-being, social inclusion, economic growth (due to the Objectives requirement for improved access to jobs), improving accessibility, reducing congestion and improving sustainable travel choice, and the need to reduce greenhouse gas emissions.
- CO5** Plan Objective is supportive of the SA Objectives to provide housing and jobs, improve health and well-being, reduce deprivation, support economic growth, and improve access to facilities and services. There is uncertainty as to the impacts on the SA Objectives to improve efficiency in land use and the prudent use of natural resources, reducing road congestion, reducing greenhouse gas emissions, the sustainable management of water and waste, reducing waste generation, conserving biodiversity, and protecting the high quality environment, this will become clearer as the options are developed to deliver this Plan Objective and tested through the SA process.

Strategic Spatial Objectives

Spatial Strategy

SO1 To achieve a pattern of activity and development that responds positively to the South East Plan and the area's particular local circumstances and environmental resources in contributing to the Community Strategy and the Spatial Vision

- 1.1 To meet the development requirements and otherwise accord with the development strategy of the South East Plan
- 1.2 To guide sustainable development and help build more sustainable communities, with a better balance between homes and jobs
- 1.3 To maintain the character of settlements, the relationship between them and with their landscape settings
- 1.4 To give particular attention to promoting economic regeneration and growth for the Hastings/Bexhill area
- 1.5 To give particular attention to supporting the 'market towns' roles of Battle and Rye
- 1.6 To meet local needs and support vibrant, mixed communities in the rural areas whilst giving particular attention to the ecological, agricultural, public enjoyment and intrinsic value of the countryside

Bexhill

SO2 To strengthen the identity of the town and for it to become one of the most attractive places to live on the south coast, attractive to families, the young and elderly alike, within an integrated approach to securing a more prosperous future for the Bexhill and Hastings area

- 2.1 To foster a more balanced demographic profile, while at the same time providing for the needs of older people
- 2.2 To improve the quality of the built environment
- 2.3 To increase the range of local job opportunities
- 2.4 To secure investment in improved community infrastructure
- 2.5 To ensure that development strengthens the identity of the town and its character

Battle

SO3 To support the market town and tourist centre role and character of Battle, and conserve its historic core and setting

- 3.1 To enhance the commercial and tourism attractiveness of the town centre
- 3.2 To conserve the key characteristics of the town and its setting that contribute to the AONB
- 3.3 To reduce congestion and improve accessibility, especially by non-car modes
- 3.4 To maintain the town's physical identity
- 3.5 To provide increased opportunities for employment locally
- 3.6 To improve the level of community facilities and sports/recreation facilities

Rye

SO4 To improve the economic and social well-being of Rye, including in relation to its market town role, tourism and the Port of Rye, whilst fully respecting and sensitively managing its historic character, vulnerability to flooding and ecologically important setting

- 4.1 To provide high quality education and employment
- 4.2 To enhance sustainable tourism and leisure
- 4.3 To improve the availability of day to day goods and services
- 4.4 To secure investment (in community facilities and) in new and/or improved pedestrian and cycle routes linking residents to their facilities
- 4.5 To conserve and enhance the unique character and quality of the Citadel and its distinctive landscape setting
- 4.6 To protect and sensitively manage the high quality ecological and landscape resources
- 4.7 To continue to manage, and protect the community from, the risk of flooding
- 4.8 To enhance the character and amenities (including visitor amenities) of Rye Harbour

Rural Areas

SO5 To promote and support an active, accessible and well managed countryside whilst having full regard to its protection and enhancement. To continue to promote vibrant, inclusive villages, and settlement groupings, that retain their essential character, diversity and relationship with their surroundings

- 5.1 To recognise the individual distinctiveness of villages
- 5.2 To retain and enhance the rich cultural heritage of villages
- 5.3 To ensure viable and accessible rural services
- 5.4 To be more inclusive, especially in terms of access to housing
- 5.5 To support local employment opportunities

- 5.6 To ensure that new development helps meet local needs, enhances or supports local services and community facilities and is in harmony with its setting
- 5.7 To promote use of public transport to larger and neighbouring settlements
- 5.8 To promote environmentally sensitive land management that respects and conserves the historic landscape mosaic and supports a diversity of habitats
- 5.9 To support agriculture and foster other land-based industries
- 5.10 To retain and better manage ancient woodland
- 5.11 To support sustainable tourism and recreation, including improved access to the countryside
- 5.12 To ensure effective and appropriate use of existing sites and buildings, especially for employment generating purposes, including tourism

Shared Objective for Bexhill and Hastings

SO6 To secure a more prosperous future for the Hastings and Bexhill area. Economic regeneration and growth will be generated through joined up working concentrating on:

a) the provision of high quality education opportunities, skills training and economic development

b) social regeneration

c) strategic physical and environmental projects and programmes.

- 6.1 To develop an integrated learning and employment strategy, in conjunction with other key agencies, that secures both increased skills and business investment across the area
- 6.2 To support the Bexhill/Hastings Link Road and the Baldsloew link as being essential for the economic and social regeneration of the two towns and to improve road and rail connections to the rest of the South East
- 6.3 To develop and support a 'local transport strategy' for Hastings and Bexhill that brings forward more sustainable travel patterns and critical investment in all modes of transport infrastructure
- 6.4 To ensure that there is a range of housing supply across Hastings and Bexhill to support sustainable growth, including for economically active people and families
- 6.5 To secure investment in, and otherwise assist, areas of socio-economic need, with particular regard to social inclusion, getting people back into work and dealing with the problems created by the 'informal economy'
- 6.6 To promote the development of Pebsham Countryside Park and other cross-boundary environmental schemes, including green space and urban fringe management
- 6.7 To recognise the important contribution of culture, sports arts, tourism and leisure to the economies of Hastings and Bexhill and to the health and well-being of people living there.

Matrix for Comparing Plan Objectives against SA Objectives

SA Objectives	SO1	SO2	SO3	SO4	SO5	SO6
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 the 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	?	?	?	?	?	?

Commentary

- SO1** Plan Objective is compatible with SA Objectives to provide opportunity for everyone to live in a decent home, to improve health and well-being, reduce deprivation and social exclusion, sustain economic growth, improve accessibility, reduce road congestion, conserve biodiversity and protect and enhance the high quality built and natural environment. Uncertainty whether this objective will minimise the risk of flooding as areas of the district are at risk of flooding; achieving a reduction in greenhouse gas emissions and waste generation is unclear at this stage as achieving a pattern of development in accordance with the South East Plan indicates growth levels that could compromise these SA Objectives.
- SO2** Plan Objective is compatible with the social and environmental SA Objectives. Uncertainty over the efficiency in land use as Bexhill is focus for strategic growth and demands for development could require large-scale release of Greenfield land, furthermore it is not clear the true biodiversity value of land that may be required. Achieving a reduction in greenhouse gas emissions and waste generation is unclear at this stage as achieving strategic growth levels could compromise these SA Objectives.
- SO3** Plan Objective is compatible with SA Objectives to improve the health and well-being of the population, sustain economic growth, improve accessibility to services and facilities, facilitate increased engagement in leisure and cultural activities, reduce road congestion and conserve biodiversity and protect and enhance the high quality natural and built environment. Uncertainty over whether the objective will contribute to reducing greenhouse gas emissions or waste generation and the prudent use of natural resources, this will become clearer as the options are developed to deliver this Plan Objective and tested through the SA process.
- SO4** Plan Objective conforms with SA Objectives to improve the health and well-being of the population, reduce deprivation and social exclusion, sustain economic growth, improve accessibility to services and facilities, facilitate increased engagement in leisure and cultural activities, reduce road congestion, conserve biodiversity, protect and enhance the high quality natural and built environment and minimise the risk of flooding and resulting detriment to people and property. It is unclear whether there will be a negative effect on efficiency in land use and the prudent use of natural resources, reducing emissions of greenhouse gases and reducing waste generation, this will become clearer as the options are developed to deliver this Plan Objective and tested through the SA process. Objectives are not currently addressing housing need which is considered to be an issue in Rye – suggest adding housing to first sub-objective.

- SO5** Plan Objective is compatible with SA Objectives to provide opportunity for everyone to live in a decent home, to improve health and well-being, reduce deprivation and social exclusion, improve accessibility, reduce road congestion, and protect and enhance the high quality built and natural environment. Plan Objective is compatible with SA Objectives to sustain economic growth and to facilitate increased involvement in leisure activities. Uncertainty whether there will be negative effects on reducing greenhouse gas emissions, minimising the risk of flooding and on reducing waste generation, this will become clearer as the options are developed to deliver this Plan Objective and tested through the SA process.
- SO6** Plan objective positively addresses the SA Objectives concerned with housing, health, social exclusion and deprivation, education, the economy, accessibility, culture and leisure and congestion and sustainable travel patterns. There are a number of question marks over the potential environmental impact of the objectives, for example it is unclear the effects on biodiversity, water quality, emissions, waste generation and the high quality environment that will result as a consequence of the implementation of the objective in relation to house-building and building the link road. Mitigation through the EIA will address a number of environmental concerns but ultimately there is likely to be residual negative effects on the environment.

Overall Comment

It may perhaps be considered that the above assessment of objectives has been overly cautious in respect of the number of question marks against the (predominantly) environmental objectives. It could be argued that the majority of these question marks could legitimately be marked as adverse effects based upon general assumptions that house-building, economic and development-led objectives negatively affect the environment; however, the spirit of these objectives is that they work in harmony to improve the sustainability of the District. Therefore where it is genuinely not clear how the implementation of one objective might mitigate the potentially adverse effects of another a question mark has been inserted as the appropriate assessment given the stage which the plan has reached.

APPENDIX 3

PLAN OPTIONS

Scale of Growth

Option 1 – Draft South East Plan requirements of 280 per annum for 2006-2026 or 5,600 over the 20-year plan period

Option 2 – Draft South East Plan requirements for 2006-2026 of 280 per annum + 25% = 350 per annum = 7,000 over the 20-year plan period

SPATIAL OPTIONS

Overall Spatial Distribution

Option 1 - Based on Relative Proportion of Current Population - Essentially, this option apportions housing growth relative to population. In order to adhere to the 200/80 split that in the Draft South East Plan, this has been done in two parts, by South Coast Sub-Region (about 56,000) and by the remainder of the District (just under 31,000).

This option would generally maintain the existing pattern of settlements and the relationship between them. Bexhill would be the location for just over half the housing growth to 2026. Compared to other options, option 1 results in a comparatively high proportion of housing growth directed towards the rural village areas (104 dwellings per annum). Some 35,000 people live in this area, of which about 8,000 live in settlements of below 100 population.

Option 2 – Based on Service Centre Role - This option apportions housing growth according to relative service role, so that growth is directed towards settlements that support a range of services. Services in this context may be taken to include shops, schools, community, health and sporting facilities, etc.

Generally, a 'service' role increases reflects the size of the settlement. However, there are exceptions, particularly at the village level where small villages can in some circumstances act as a service centres for much wider area. Conversely, villages with larger populations sometimes have limited services, particularly if they are located in close proximity to a much larger town, such as Hastings.

As the main service town in the district, Bexhill is the appropriate location for a high proportion of new growth. The two small market towns of Battle and Rye are next in the service hierarchy, followed by the rural villages. The split between villages would be based upon the service centre hierarchy identified in the background 'Rural Settlement Strategy'.

Option 3 – Trend-based Option - Option 3 directs future growth in the same proportion as has been exhibited in trends of development over the last 5 Years. Hence, it reflects market forces to a large extent.

This distribution based on development trends corresponds quite closely to the distribution based upon population (option 1). This may be partially explained by the fact that many completions are “windfalls” within development boundaries of settlements, the existence of which tend to reflect their size.

This option also results in a relatively high apportionment of growth to the rural villages, reflecting the high proportion of growth that has taken place outside Bexhill, Battle and Rye in recent years.

Option 4 - Based on the Extension of Current Housing Commitments to 2011

This forecast future distribution of housing represents the continuation of what is expected to happen over the Local Plan period to 2011. It is assessed by analysing large site commitments, past completion rates on windfall sites and the allocation of sites in the Rother District Local Plan.

By this method the relative distribution for the period 2007-2011 is Bexhill (48%), Battle (14%), Rye (9%) and the rural parishes (29%).

Theoretically, option 4 should have been expected to produce similar results to option 2, given that they are both influenced by Local Plan policy. Indeed, the proportion of development in the market towns vis-à-vis the villages is similar. Perhaps surprisingly though, Bexhill is still relatively low and the market towns and rural villages still relatively high. Indeed, this option gives a higher proportion of development to the two market towns than all other options, except option 5. The low apportionment to Bexhill needs to be interpreted in the context that option 4 is a four year snap-shot of current planning strategy. Considerable growth is earmarked for North-East Bexhill post 2011.

Option 5 - Based on Housing Needs - Using analysis contained within the Housing Needs Assessment 2005, this option is based upon the locational preferences (up to two) expressed by concealed households forming in each area to 2009.

This option results in relatively low growth apportionment to Bexhill, but very high levels of growth being directed to Rye and Battle, since the two market towns are both popular locational preferences for households on the housing register.

Bexhill

<i>Option</i>	<i>Central theme</i>	<i>Scale of growth</i>	<i>Main areas of change</i>	<i>Strategy emphases</i>	<i>Strengths/ weaknesses</i>
1	Maintain Bexhill's role	Low-medium	North-east and north-west Bexhill	Efficient urban area, including town centre; Regeneration of parts of town, its facilities and environment	Retains town character; Low risk/ low interventions; Limited economic/ demographic change
2	Expand Bexhill's role	Large	North and west Bexhill Bexhill town centre	Strong identity; Growth areas; New transport infrastructure; Retail growth; New facilities; Major public realm projects;	Supports demographic change; Meets growth agenda; Relies on investment in roads, etc; High scale of job creation?
3	Coordinated approach to the Bexhill/ Hastings area	Medium-large	North Bexhill and west Hastings; Hastings town centre; Pebsham park; Bulverhythe; Ravenside	A shared catchment; 'Green heart'; Cross-boundary infrastructure, including Wilting Station and bus corridors	Efficiencies in delivering facilities Joint "voice" Weakens identity of town

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Battle

Option	Central theme	Scale of growth	Main areas of change	Strategy emphases	Strengths/ weaknesses
1	Continued development to support the town's role. This would mean a continuation of the adopted Local Plan's strategy.	Medium	<p>It is unlikely that another site as large as Blackfriars could be found, but it may be possible to find several smaller sites to give approximately the same growth rate.</p> <p>Sites would need to be identified that were not in conflict with the strategy aims, especially the need to conserve the High Weald Area of Outstanding Natural beauty.</p>	<p>Growth in the service centre role of the town employment and economic opportunities and housing choice.</p> <p>Improving accessibility is likely to prove difficult, but improvements to managing car and coach parking are possible.</p>	<p><u>Strengths</u> This option would be likely to secure the earlier construction of the second primary school already provided for as part of the Blackfriars development. A second primary school in this location should meet the objective of reducing cross town traffic.</p> <p>Services and facilities should be retained and likely improved.</p> <p><u>Weaknesses</u> There would be some changes to the physical appearance of Battle.</p>
2	Limited growth	Limited/low	A low growth option could largely limit development to infilling and development or redevelopment within the confines of the existing development boundary. This approach would give rise to less development than under the existing strategy.	<p>Best use would need to be made of any development opportunities within the town to consolidate both its role and its urban 'form'.</p> <p>As a service centre for surrounding villages, development in those villages will also impact upon Battle.</p> <p>The level of development at Battle needs to be considered alongside that in the rural areas, as they will together meet the likely requirement for development in the inland parts of the District.</p>	<p><u>Strengths</u> The physical appearance of Battle would be largely unaltered.</p> <p><u>Weaknesses</u> Limited scope for planning gain to help improve local facilities, services and infrastructure, including affordable housing.</p>

Rye

Option	Central theme	Scale of growth	Main areas of change	Strategy emphases	Strengths/ weaknesses
1	Strengthen the market town role of Rye and the commercial role of Rye Harbour and the Port of Rye	Medium	Extension to development boundary to the north of Rye. Extension to employment area to include land west of Rastrum site. Regeneration of parts of town, including town centre. (Within development boundary and Rye Harbour Road employment area utilising existing allocations and commitments.)	Growth in service centre role of town, employment and economic opportunities and housing choice.	<p>Strengths:</p> <ul style="list-style-type: none"> • Regeneration of Rock Channel and Harbour Road areas • Opportunity to deliver significant amount of affordable housing • Opportunity to deliver increased housing choice • Development supports enhancement of service centre role of Rye <p>Weaknesses:</p> <ul style="list-style-type: none"> • Unrealistic amount of land required for the significant environmental constraints • Requires use of significant amount Greenfield land
2	Strengthen the social functions of Rye and Rye Harbour and make the most of the important environmental circumstances	Limited / Low	Within the development boundary and Rye Harbour Road Employment Area - focus on infill and redevelopment (including utilising existing allocations and commitments). Regeneration of parts of town, including the town centre.	Enhancing social functions including: accessibility across the town by foot or cycle; community facilities and services (including education and its links to local business); and housing choice. Respecting, improving and utilising the important environmental assets.	<p>Strengths:</p> <ul style="list-style-type: none"> • Retention of development boundary safeguarding against further deterioration of the setting of Rye and views to and from the AONB • Regeneration of Rock Channel • Increase in pedestrian and cycle linkages across the town providing better connectivity <p>Weaknesses:</p> <ul style="list-style-type: none"> • More limited scope for increasing the supply of affordable housing (unless higher percentages were sought in this area) and improving housing choice

Rural Areas - Villages

Option	Central theme	Scale of growth	Main areas of change	Strategy emphases	Strengths/ weaknesses
1	Continue to Focus on Service Centres	Low, Medium or High	'Rural Service Centres' (Robertsbridge and Ticehurst), and to a lesser extent 'Local Service Villages' (Burwash, Hurst Green, Sedlescombe, Northiam, Westfield, Peasmarsh, Broad Oak, Catsfield)	Service role of settlements (ie provision of shops, schools, health facilities, post offices, pubs, community halls, play areas, sports facilities, places of worship, library, petrol stations)	<p>Strengths</p> <ul style="list-style-type: none"> • Conformity with 'Preferred Option' at District-wide level. • Conformity with government guidance (PPS7). • Allows maximum amount of people to benefit from provision of services, which in turn increases economic viability of services themselves. • Cost effective – option that would require less <i>new</i> infrastructure and services. <p>Weaknesses</p> <ul style="list-style-type: none"> • Does not take into account transport infrastructure.
2	Development to Support Community Needs and Deficiencies	Low, Medium or High	Housing Needs Assessment identified particular needs in east and north (centred on Rye and Ticehurst respectively), but no need in villages in centre (centred on Battle). Other needs spread across the district.	Led by Housing needs to a large degree. Secondary emphasis on locally identified need for supporting services (e.g. play areas, village halls). Such specific needs may have been identified in a number of sources, including Rother District Council evidence studies or Parish Plans.	<p>Strengths</p> <ul style="list-style-type: none"> • Arguably the option that does most to address key issue of affordable housing. • May be popular at local level <p>Weaknesses</p> <ul style="list-style-type: none"> • Question marks over reliability of supporting information, particularly regarding housing pressures (e.g housing registers dependent on where availability is perceived to be) and locally identified 'needs' (where information has only been forthcoming from a minority of parishes) • Difficult and complex to implement, (eg may be dependent on S106 at DC level) • Directs development towards where services are lacking (arguably the opposite of service centre approach advocated by PPS7)

<i>Option</i>	<i>Central theme</i>	<i>Scale of growth</i>	<i>Main areas of change</i>	<i>Strategy emphases</i>	<i>Strengths/ weaknesses</i>
					<ul style="list-style-type: none"> • Arguably over-emphasises affordable housing issue. • Expensive – may require new facilities and infrastructure.
3	Focus Development on Few Larger Villages	Low – Medium	Robertsbridge, Northiam, Ticehurst, Hurst Green	Settlements that have a service role as well as good accessibility.	<p>Strengths</p> <ul style="list-style-type: none"> • Incorporates consideration of service role combined with consideration of accessibility. <p>Weaknesses</p> <ul style="list-style-type: none"> • May result in levels of growth in identified settlements disproportionate to current populations and therefore possible negative impacts on cohesiveness of selected towns. • May result in genuine housing needs within smaller settlements being overlooked.
4	Dispersed Development 4a: Population based across villages 4b: Historic Farmstead based	4a - Low, Medium or High 4b - Low	4a – Spread between all 45 villages identified in the Rural Settlement Strategy according to relative population. 4b – Spread even more widely, incorporating tiny hamlets and even smaller historic farmsteads.	More manageable growth at a greater number of settlements. Reinforces historic pattern of settlement within High weald AONB.	<p>Strengths</p> <ul style="list-style-type: none"> • Reinforces historic settlement pattern to a greater degree. • Spreads development in a way that could be perceived as ‘equal’ • Conforms with High Weald AONB and English Heritage representations. <p>Weaknesses</p> <ul style="list-style-type: none"> • Population does not necessarily correspond to either accessibility, provision of services, or local needs – all factors that constitute ‘good planning’. • Directs development to settlements that may not even have a defined development boundary (i.e. were not considered appropriate locations for development at local plan)

<i>Option</i>	<i>Central theme</i>	<i>Scale of growth</i>	<i>Main areas of change</i>	<i>Strategy emphases</i>	<i>Strengths/ weaknesses</i>
					<ul style="list-style-type: none"> • Arguably contrary to government guidance in the form of PPS7, particularly 4b therefore cannot really be considered as a realistic alternative as a result. • May lead to additional strain on infrastructure and increased travel patterns.
5	Focus Development on Transport Corridors	Low, Medium or High	Two existing transport corridors. The two main trunk roads (A21 and A259) and the two main rail lines follow broadly similar north/south (to London via Robertsbridge) and east/west routes (to Ashford & Kent via Rye).	Economic development led. Emphasises strengthening Rother's role within wider South-East England context. Emphasis on connectivity to London (via A21) and Europe (via Ashford, Folkestone, Dover)	Strengths <ul style="list-style-type: none"> • Facilitates greater commuting (north to London and Tunbridge Wells, south to Hastings and Bexhill, east to Kent). • May have knock-on benefit of facilitating regeneration of Hastings and Bexhill • Enhances Rother's role in region. • Helps re-enforces rail services. Weaknesses <ul style="list-style-type: none"> • Negative environmental impacts - may encourage commuting longer distances and more car travel. • Less incentive to provide jobs and facilities locally. • Possible negative impacts on village identity. • May lead to higher house prices and worsening affordability gap.

Countryside

<i>Option</i>	<i>Central theme</i>	<i>Strategy emphases</i>	<i>Strengths/ weaknesses</i>
1	Continue to tightly control development in the countryside, with the aim of balancing the tension between the protection of the countryside for its own sake while having regard to the pressures and potentials for development	Continuation of current policy direction in Local Plan. Strategy in line with Government policy statements and guidance in respect of the countryside and areas of AONB designation, whilst allowing limited opportunities for housing needs and employment opportunities to ensure vitality of rural areas.	<p>S: A significant part of the District is designated within the High Weald Area of Outstanding Natural Beauty, the primary purpose of which is to conserve and enhance the natural beauty of the landscape. By strictly controlling new building development in the open countryside, landscape character, natural resources, wildlife habitats, and tranquil areas will continue to be protected for the benefit of all.</p> <p>W: Schemes which would benefit economy of the countryside may be overlooked. Also local needs housing may be compromised.</p>
2a	Allow intensified development in the countryside to stimulate and support farming economies, and maximise economic, tourist and recreational potential	Allows Council to pursue intensified development in the countryside to make maximum use of natural resources and potentials. Driver of option is financial gain over preservation and enhancement.	<p>S: Positive impacts for the economy as intensified development could take a number of forms and may be associated with or separate from agricultural industries, such as new employment sites, tourist and recreational facilities</p> <p>W: Negative impacts on the countryside's intrinsic character and beauty by the intensification of existing uses, loss of Greenfield sites and the intensification of traffic.</p>
2b	To override countryside policies of development restraint, by the intensification and extension of isolated farmsteads to provide dwellings for those involved in land based economic activity	Root of strategy is High Weald AONB Unit's proposal to benefit the management of the countryside, by the intensification and extension of farmstead sites for residential purposes to meet rural housing needs. Occupancy of such development to be confined to those in local land-based economic activity.	<p>S: The provision of new affordable housing within historic farmsteads may help to meet the skills gap of those engaged in land-based economic activity that will help to sustain and enhance the natural beauty of the AONB. Also potential for use of farmsteads for land based enterprise and to incorporate renewable energy projects such as woodfuel. Such developments have the potential to reinstate farm complexes.</p> <p>W: Detrimental impact on historic settlement pattern and setting. Loss of Greenfield sites and intensification of traffic movements. Potential legal considerations in terms of enforceability of occupancy conditions.</p>

CROSS-CUTTING/THEMATIC OPTIONS

COMMUNITIES

Affordable Housing - Percentage

Option 1: Continue with the percentages set out in Local Plan Policy HG1.

Option Two (Preferred): Adjust the percentage requirements for affordable housing by means of a requirement for:

- **50% in Rural Villages**
- **40% in Rye and Battle**
- **35% in Bexhill**

Affordable Housing – Threshold

Option 1: Continue with the thresholds set out in Local Plan Policy HG1, as supported by the Affordable Housing Supplementary Planning Document 2006

Option Two: Lower the threshold in urban areas, by either of the methods below:

- **Option 2a: would be to lower the threshold in all urban areas from the current 15 to 10, or;**
- **Option 2b (Preferred) is to lower it in Rye and Battle to 10 but to maintain it at 15 in Bexhill.**

Option Three: Lower the threshold in rural areas by either of the methods below:

- **3a) Lower the rural threshold from 5 to 3, and from 0.2ha to 0.12ha**
- **3b) Maintain threshold of 5, but require all developments of 3 and 4 bedrooms to provide one affordable dwelling**

Affordable Housing – Type

Option One: Apply a minimum of 25% social housing and 10% intermediate on all sites.

Option Two: Bexhill Option: Social rented would comprise 20-25% of the mix on Bexhill major development sites, with the balance (15-20%) comprising intermediate housing.

Option 3: Rural Option - A proposed mix of 10%-20% intermediate, 20%-30% social rented in rural areas

Affordable Housing Allocations

Option 1: Retain principle of exception sites in line with current local plan policy

Option 2: Allocate small sites (less than 10 dwellings) wholly or substantially for affordable housing in areas of need

Housing Mix

Option 1: Retain Local Plan policy of 30% requirement of 1&2 bed properties as stands

Option 2: Aim for a higher target of 40% in rural areas, where the need is greatest

ENVIRONMENT

Design Quality

Option	Central theme	Strategy emphases	Strengths/ weaknesses
1	Maintain a general expectation of design quality as a consideration in the planning process	Maintaining existing Local Plan position - Policies DS1, GD1, HG4, HG9, EM3 all generally seek to ensure development respects and does not detract from the character and appearance of the locality	these policies go some way to ensuring the overall objectives of achieving quality in the built and natural environment; Current lack of clearer and robust design policies and locally specific policies a disadvantage at Appeal Stage.
2	Set achieving high design quality as a central theme in the planning process	Strengthened Policies for Design Quality and Landscape Stewardship: Development of Key Design Principles against which planning applications will be tested; new development required to contribute positively to the character of the site and surroundings	Meets current Central Government Guidance on design in the planning system, Gives clear criteria against which design quality can be tested; Successful implementation relies on skilled and rigorous assessment by Development Control Team

Biodiversity and Greenspace

Option	Central theme	Strategy emphases	Main areas of change	Strengths/ weaknesses
1	Using existing policy to conserve and enhance natural green space when opportunities arise.	Continue to identify improvements in association with development schemes.	Already policy exists for NE Bexhill, sites in Hastings Fringe, Rye and Battle. Mainly as a result of landscaping, buffer strips, links and recreation. In association with a generic policy	<p>Strengths</p> <ul style="list-style-type: none"> • Improvement opportunities focus resources to areas where most pressure. • Caters for unanticipated development. • Flexible. <p>Weaknesses</p> <ul style="list-style-type: none"> • Does not provide a strategic tool for decision making. • Improvement can be confined to where development proposed. • As existing does not tackle biodiversity and climate change issues.
2	Use of ANGst model helps to build up evidence base by mapping sites and identify areas where potential for improvement. Provides a district wide framework.	Will provide a systematic approach to the district wide provision of green space which can be used to identify shortfalls. This will also take on board identification of green networks.	Will be associated with mainly: New development and urban fringe. Also ancient woodland coastal habitats. Cross boundary approach Romney Marsh Living Landscape. Identification of district wide networks and linkages.	<p>Strengths</p> <ul style="list-style-type: none"> • Evidence base built up as justification for requiring provision of green space and developer contributions. • Provision can be identified in rural areas. • Elaborates on areas of strategic opportunity eg Romney Marsh Living Landscape (coastal habitat) in accordance with NRM4. • Emphasis on accessibility (ANGst) but biodiversity given importance in accordance with SE Plan and PPG9. • Proactive – gives green space importance. <p>Weaknesses</p> <ul style="list-style-type: none"> • Relatively new approach, which still needs developing.

				<ul style="list-style-type: none"> • Maybe unclear in terms of objectives • May deflect resources from priorities.
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Sustainable resource Management

Option	Central theme	Strategy emphases	Strengths/ weaknesses
1	Achieve more sustainable development through the promotion and application of new Government targets and set supportive criteria for both efficient use of resources and renewable energy production.	Promotion of sustainable resource management. Led by Government policy – produce framework for development in line with national policy. Opportunities for larger schemes to deliver higher standards. Criteria for assessing renewables schemes in line with PPS1 Supplement	S: Allows authority to be led by future changes the Government make to Building Regulations to meet their targets – providing consistency with national approach. Not unduly onerous for developers. Equitable insofar as not introducing more demanding requirements than our neighbouring authorities. W: doesn't strive for exemplar sustainable development – which may be appropriate (there may be political will for) in the high quality environment of the District. Doesn't necessarily encourage schemes for renewable energy generation.
2	Achieve exemplar sustainable development by extending beyond the Government targets and setting locally specific targets and criteria for the efficient use of resources and identify opportunities for renewable energy production.	Allows Council to require standards higher than those currently set and use future Government standards prior to their mandatory status. Opportunity to identify areas within the District suitable for the generation of renewable energy.	S: puts the District at the forefront of planning for sustainable resource management. Ensures better resource management in rural areas and particularly allows for tighter control over greenfield and AONB sites. Presents opportunities for the identification of suitable areas for renewable energy production. Greater potential for meeting Government targets. W: may place unduly onerous obligations on certain sites that affect their viability. Difficulties of identification of appropriate standards/targets – potential issues from differences with national policy and other LAs.

ECONOMY

<i>Option</i>	<i>Strategy emphases</i>	<i>Spatial implications</i>	<i>Strengths/weaknesses</i>
1. To make generous provision for sites and premises,	<p>Anticipates/plans for a “step change” in the economy</p> <p>Involves reducing economic inactivity</p> <p>Promotional of inward investment</p> <p>Provides scope for less out-commuting</p>	<p>Greater land requirement, with focus on both regeneration areas and areas of economic potential</p> <p>May support more jobs for older people remaining in the labour market</p>	<p>Strong economic growth, especially of higher value business, is still uncertain</p> <p>However, it is supported by wide-ranging regeneration efforts</p> <p>Productivity improvements may absorb growth, particularly through the adoption of new working practices including greater use of ICT for home working</p>
2. To set aside only modest areas for employment uses.”	<p>Assumes continuation of trends</p> <p>More emphasis on “smart growth and employment linked to “quality of life” moves</p> <p>Stress on the importance of upgrading local skills</p>	<p>Lesser land allocated for employment uses</p> <p>Economic growth more dispersed and based on existing distribution</p>	<p>May have less impact on the ‘ecological footprint’</p> <p>Limitations to the numerical adjustments to land requirement to meet the needs of firms for modern space</p> <p>May mean lost opportunities</p>

TRANSPORT

<i>Option</i>	<i>Strategy emphases</i>	<i>Spatial implications</i>	<i>Strengths/weaknesses</i>
1. Focus on investment in road and rail transport	Reducing intra-regional peripherality	A21 corridor schemes; development likely to support investment in new stations and roads	<p>Addresses perceived core reason for weak economy</p> <p>Limited public funds/programmes</p> <p>Environmental impacts</p>
2. Focus on investment in improvements in local transport infrastructure and services	Reducing reliance on the car for local journeys	<p>Local schemes, especially in towns;</p> <p>Reduction in road space for buses, cycling</p>	<p>Reduces carbon footprint</p> <p>Improves currently low levels of non-car travel</p> <p>Limitations in rural areas</p>

APPENDIX 4

INITIAL SUSTAINABILITY APPRAISAL

Sustainability appraisal scoring criteria

Symbol	Likely effect against the SA Objective
✓	Potentially significant beneficial effect
(✓)	Option supports this objective though it may only have a minor effect
~	3. Policy has no effect 4. 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 and may result in minor adverse effects
X	Potentially significant adverse effect

Each option 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

The final point, referring to magnitude, serves as an initial proxy for identifying the relative significance of the impacts of the Option. This activity also provides an initial opportunity to identify potential cumulative and synergistic impacts and to consider appropriate mitigation measures. 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

Scale of Growth

Option 1 – Draft South East Plan requirements of 280 per annum for 2006-2026 or 5,600 over the 20-year plan period

Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	✓	✓	✓	Rate of development over the 20-year plan period is marginally higher than the average Structure Plan requirements and this should help to deliver a greater amount of affordable dwellings.
To improve the health and well-being of the population and reduce inequalities in health	(✓)	✓	✓	Greater access to affordable homes should contribute to improving health and well being of residents. Consideration should be given to appropriate levels of density and the provision of community facilities and services to ensure maximum benefits.
To reduce crime and the fear of crime	~	(✓)	(✓)	Scope exists for contributing to reducing the fear of crime through general regeneration, and 'secure by design' developments that seek to provide measures that improve the feeling of safety, such as open and well-lit walkways.
To reduce deprivation and social exclusion	(✓)	✓	✓	Opportunity exists for the regeneration of areas of deprivation, the urban centres of Bexhill and Rye which have wards in deprivation particularly for child poverty for example.
To raise educational achievement levels and develop the opportunities for lifelong learning	~	~	(✓)	Additional infrastructure and community facilities provided in combination with this level of new housing support this objective. Where concentrations of development are likely to occur such as North East Bexhill this would trigger the provision of a new primary school. Opportunities then arise for improving the standard of provision in the area and in time to raise educational levels.

To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	(✓)	(✓)	Option would provide a number of new dwellings to support long-term economic growth, in both urban and rural economies.
To improve accessibility to services and facilities for all ages across the District	(✓)	✓	✓	This scale of growth would enable greater access to services and facilities through the location of development and the provision or improvement of additional facilities through contributions as well as well as improvements to the PRow network – improving travel choice and accessibility to services.
To encourage and facilitate increased engagement in cultural and leisure activities	~	~	(✓)	The importance of accessible green space to healthy living is well documented and new development would be required to provide access to quality spaces for leisure and recreation. Option would not necessarily encourage or facilitate engagement in cultural activities.
To improve efficiency in land use and encourage the prudent use of natural resources	(X)	(X)	(X)	The scale of growth will result in the development of greenfield sites and cannot rely on previously developed land or the re-use of buildings to provide the necessary number. The Council will seek to ensure the prudent use of natural resources in the construction of all development within the district.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(X)	(X)	(X)	The delivery of this scale of growth will ultimately add to the growth of traffic in the District and a proportion of this will be car use – particularly given the rural nature of the District. Areas will see improved travel choice through the location and contributions of development providing access to jobs and services by a wider choice of modes of travel. Air quality is not currently a problem in the District but where possible air quality impacts should be considered and mitigated.
To reduce emissions of Greenhouse gases	(X)	(X)	(X)	This level of growth will inevitably have negative effects on the objective to reduce greenhouse gas emissions in both construction and operation phases and associated transport movements. Mitigation in the form of sustainable construction requirements and building operationally sustainable homes will be key in addressing this objective.

To minimise the risk of flooding and resulting detriment to people and property	?	?	?	It is unclear at this stage whether this level of development will result in an increase in the number of properties in the floodplain. The SFRA will inform.
To maintain, improve and manage water resources in a sustainable way	?	?	?	The southeast region is a particularly dry part of the country and water resources need to be carefully planned. The Council will seek to ensure water efficiency in construction and operation of new development. The overall scale of growth will place demands on water supply, which need to be better understood.
To conserve and enhance biodiversity	(X)	(X)	(X)	This level of growth will result in the development of greenfield sites, sites in the countryside as well as previously developed sites which may contain biodiversity value. Therefore there is likely to be a net loss in biodiversity in the District. This can be mitigated in part through requirements for habitat enhancement and creation as part of contributions frameworks.
To protect and enhance the high quality natural and built environment	~	~	~	Strong design and sustainable construction policies should ensure the protection and enhancement of the built and natural environment – adding to the natural beauty and character of the AONB and historic environments alike. There maybe some loss of countryside due to the demand for greenfield land.
To reduce waste generation and disposal, and achieve the sustainable management of waste	(X)	(X)	X	The scale of growth in this option could have a potentially significant effect on waste generation through construction and operation. Opportunities for sustainable management of waste through increased recycling and composting. Sustainable construction requirements should help to limit waste produced in construction and aim to re-use materials where possible.
Conformity with other policy/initiatives: Draft South East Plan				
Non-conformity: Possible conflict with government target to achieve 60% development on brownfield land				
Summary: Option performs well against the social and economic SA Objectives and should deliver increased affordable dwellings, an increase in the choice of dwellings type and tenure, better access to jobs, services and facilities.				

Scale of Growth

Option 2 – Draft South East Plan requirements for 2006-2026 of 280 per annum + 25% = 350 per annum = 7,000 over the 20-year plan period

Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	✓	✓	✓	This scale of growth should have significant positive benefits for this SA Objective, increasing housing affordability, choice and mix.
To improve the health and well-being of the population and reduce inequalities in health	(✓)	✓	✓	Greater access to affordable homes should contribute to improving health and well being of residents. Consideration should be given to appropriate levels of density and the provision of community facilities and services to ensure maximum benefits.
To reduce crime and the fear of crime	~	(✓)	(✓)	Scope exists for contributing to reducing the fear of crime through general regeneration, and 'secure by design' developments that seek to provide measures that improve the feeling of safety, such as open and well-lit walkways.
To reduce deprivation and social exclusion	(✓)	✓	✓	Opportunity exists for the regeneration of areas of deprivation, the urban centres of Bexhill and Rye which have wards in deprivation particularly for child poverty for example.
To raise educational achievement levels and develop the opportunities for lifelong learning	(✓)	✓	✓	Additional infrastructure and community facilities provided in combination with this level of new housing support this objective. Where concentrations of development are likely to occur such as North East Bexhill this would trigger the provision of a new primary school – there are likely to be more opportunities for primary school provision with this scale of

				growth. Opportunities then arise for improving the standard of provision in the area and in time to raise educational levels.
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	(✓)	?	?	A greater scale of growth could provide increased support for the economic growth of the District. However the required economic growth may require a step change in the type of sector that flourishes in the District and this may not be dependent or even benefit from increased growth per se.
To improve accessibility to services and facilities for all ages across the District	(✓)	✓	✓	This scale of growth would enable greater access to services and facilities through the location of development and the provision or improvement of additional facilities through contributions as well as well as improvements to the PRoW network – improving travel choice and accessibility to services.
To encourage and facilitate increased engagement in cultural and leisure activities	~	~	(✓)	The importance of accessible green space to healthy living is well documented and new development would be required to provide access to quality spaces for leisure and recreation. Option would not necessarily encourage or facilitate engagement in cultural activities.
To improve efficiency in land use and encourage the prudent use of natural resources	X	X	X	This scale of growth will result in the development of greenfield sites and cannot rely on previously developed land or the re-use of buildings to provide the necessary number. The Council will seek to ensure the prudent use of natural resources in the construction of all development within the district.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(X)	X	X	The delivery of this scale of growth will ultimately add to the growth of traffic in the District and a proportion of this will be car use – particularly given the rural nature of the District. This option could result in significant negative effects on this SA Objective. Areas will see improved travel choice through the location and contributions of development providing access to jobs and services by a wider choice of modes of travel. Air quality is not currently a problem in the District but where possible air quality impacts should be considered and mitigated.

To reduce emissions of Greenhouse gases	(X)	X	X	This level of growth could have significant negative effects on the objective to reduce greenhouse gas emissions in both construction and operation phases and associated transport movements. Mitigation in the form of sustainable construction requirements and building operationally sustainable homes will be key in addressing this objective.
To minimise the risk of flooding and resulting detriment to people and property	?	?	?	It is unclear at this stage whether this increased level of development will result in an increase in the number of properties in the floodplain. The SFRA will inform.
To maintain, improve and manage water resources in a sustainable way	?	?	?	The southeast region is a particularly dry part of the country and water resources need to be carefully planned. The Council will seek to ensure water efficiency in construction and operation of new development. This overall scale of growth will place potentially significant demands on water supply, which need to be better understood.
To conserve and enhance biodiversity	(X)	X	X	This level of growth will result in the development of greenfield sites, sites in the countryside as well as previously developed sites which may contain biodiversity value. Therefore there is likely to be a net loss in biodiversity in the District. This can be mitigated in part through requirements for habitat enhancement and creation as part of contributions frameworks.
To protect and enhance the high quality natural and built environment	~	~	~	Strong design and sustainable construction policies should ensure the protection and enhancement of the built and natural environment – adding to the natural beauty and character of the AONB and historic environments alike. There maybe some loss of countryside due to the demand for greenfield land.
To reduce waste generation and disposal, and achieve the sustainable management of waste	(X)	X	X	The scale of growth in this option could have a potentially significant effect on waste generation through construction and operation. Opportunities for sustainable management of waste through increased recycling and composting. Sustainable construction requirements should help to limit waste produced in construction and aim to re-use materials where possible.

Conformity with other policy/initiatives: Draft South East Plan – indications are that SE Plan housing figures are only a guide and could be regarded as minimum requirements.
Non-conformity: Possible conflict with government target to achieve 60% development on brownfield land. Possible conflict with the AONB Objectives
Summary: Option performs well against the social SA Objectives, providing greater opportunities for contributions to developing social infrastructure including PRoW. Uncertainty in respect of the economic growth required for the District and particularly that part of the District in the Sussex coast Sub Region and what level of growth would be appropriate for the type of economic growth desired. Possibility of greater significance of negative effects on the SA Objectives concerned with making efficient use of land, reducing greenhouse gas emissions, reducing traffic congestion and improving air quality, conserving and enhancing biodiversity and reducing waste generation.

DISTRICT WIDE SPATIAL DISTRIBUTION

Distribution of Growth Based upon South East Plan Housing Requirements of 280 per Annum

Option 1 – Based on relative proportion of current population – apports housing growth according to the current population distribution. Bexhill would therefore be the location for just under half the housing growth to 2026

Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	~	~	~	The distribution options are all based upon the same overall scale of growth (280 per annum) and therefore the overall provision does not change. It has been considered prudent for assessment purposes to assume this batch of options would have neutral effects against this SA Objective.
To improve the health and well-being of the population and reduce inequalities in health	(✓)	(✓)	(✓)	Directing development according to levels of population can help to bring homes, facilities and amenities to those areas in need.
To reduce crime and the fear of crime	~	~	~	
To reduce deprivation and social exclusion	~	~	~	The options for the distribution of housing do not offer significantly different opportunities for addressing deprivation and social exclusion.
To raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	(✓)	(✓)	Directing growth to already populated areas can have the effect of concentrating workforce resources which can help to support local economies. This may be particularly important

				for the rural economy.
To improve accessibility to services and facilities for all ages across the District	(✓)	(✓)	(✓)	Directing growth to areas of highest population could serve to increase accessibility to new and improved services and facilities for greater numbers of the population, but perhaps to a lesser extent in the rural areas.
To encourage and facilitate increased engagement in cultural and leisure activities	(✓)	(✓)	(✓)	Directing growth to areas of highest population could serve to increase accessibility to cultural and leisure services and facilities for greater numbers of the population including in the rural areas.
To improve efficiency in land use and encourage the prudent use of natural resources	(X)	X	X	This option would deliver a comparatively high proportion of growth to the rural villages which would likely require a higher rate of greenfield building than under other distribution options in the long-term.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(X)	(X)	(X)	As this option focuses a large proportion of development to the rural villages there is a likelihood that car use will significantly increase as people will travel to the service centre towns and villages for at least a proportion of their requirements – including education, employment, shopping etc.
To reduce emissions of Greenhouse gases	(X)	X	X	This distribution of development is likely to encourage car use given the proportion of new development that will be required in the rural area of the District.
To minimise the risk of flooding and resulting detriment to people and property	?	?	?	SFRA to Guide development.
To maintain, improve and manage water resources in a sustainable way	?	?	?	It is not possible at this stage to conclude what the impacts on water supply and quality might be from the various distribution options.
To conserve and enhance biodiversity	?	X	X	The high proportion of development that would be directed to the villages via this option could require a significant amount of greenfield land that could result in a negative effect on this objective.
To protect and enhance the high quality natural and built environment	?	X	X	This option is likely to give rise to unacceptable levels of change within the AONB and could not be reasonably said to

				minimise adverse impact on landscape setting of rural settlements.
To reduce waste generation and disposal, and achieve the sustainable management of waste	?	?	?	There may be some variations in waste generation due to distribution patterns and variations in existing opportunities for the sustainable management of waste across the District – however new development design should incorporate facilities for the separation and collection of materials for recycling.
Conformity with other policy/initiatives:				
Non-conformity: PPS7 Sustainable Development in Rural Areas – development in rural areas should be based upon sustainable development principles – future growth under this option would not be considering sustainability principles first, purely existing population figures.				
Summary: The option could deliver minor beneficial effects for health and well-being, for economic growth and access to services and culture and leisure activities. There would be a likelihood of adverse effects against the SA Objectives to improve efficiency in land use and the prudent use of natural resources; to reduce greenhouse gas emissions; to conserve and enhance biodiversity and to protect and enhance the natural and built environment. Unclear what the effects would be against the SA Objectives relating to water management, flooding and waste – these will be addressed further down the options hierarchy.				

Distribution of Growth Based upon South East Plan Housing Requirements of 280 per Annum

Option 2 – Based on service centres – apportions housing growth according to the relative service role, so that growth is directed towards settlements that support a range of services.

Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	~	~	~	The distribution options are all based upon the same overall scale of growth (280 per annum) and therefore the overall provision does not change. It has been considered prudent for assessment purposes to assume this batch of options would have neutral effects against this SA Objective.
To improve the health and well-being of the population and reduce inequalities in health	(✓)	(✓)	(✓)	Directing development according to existing service provision would have the effect of strengthening the existing pattern of provision and presents opportunities to increase healthy travel modes such as cycling and pedestrian by locating new growth close to employment, leisure and service provision.
To reduce crime and the fear of crime	~	~	~	
To reduce deprivation and social exclusion	~	~	~	The options for the distribution of housing do not offer significantly different opportunities for addressing deprivation and social exclusion.
To raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	(✓)	(✓)	(✓)	Directing growth according to relative service role will have the effect of strengthening the service settlements through an increased population supporting services and opening

				opportunities for increases in jobs and services.
To improve accessibility to services and facilities for all ages across the District	✓	✓	✓	The service centres are already the most accessible areas of the District and directing future growth to these areas will facilitate improvements in travel choice through opportunities for better public transport provision, cycle and pedestrian access.
To encourage and facilitate increased engagement in cultural and leisure activities	✓	✓	✓	Generally the service centres are also the main centres for cultural and leisure activity so directing growth to these areas should have the effect of improving access for greater numbers of people. Contributions from developments would also assist in improving access to facilities by a choice of travel modes including cycle and pedestrian links.
To improve efficiency in land use and encourage the prudent use of natural resources	?	?	(X)	In the short and medium term it is unclear whether the required level of development would improve efficiency in land use. It is clear in the long term that this option would require substantial greenfield land take and following the service centre approach this would be necessary in areas with sensitive and important historic and environmental resources.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(✓)	(✓)	?	This option could help to improve levels of self-containment. This option presents significant opportunities to improve travel choice, locating growth in areas with relatively good existing transport infrastructure and requiring further improvements to encourage modes other than the car. Service centres also provide a range of jobs and services for people to live, work and shop locally should reduce the need to travel by car. Uncertainty over the long term effects as the inevitable spread of these settlements to accommodate growth may in certain circumstances increase car use or could encourage patterns of commuting as yet unidentified.
To reduce emissions of Greenhouse gases	(✓)	(✓)	?	This distribution option addresses this objective through reducing the need to travel and associated energy consumption by locating people near to services and provisions.

				Uncertainty whether over the long term the effects will remain positive as travel patterns associated with edge of settlement development could result in an increase in car use.
To minimise the risk of flooding and resulting detriment to people and property	?	?	?	SFRA to Guide development.
To maintain, improve and manage water resources in a sustainable way	?	?	?	It is not possible at this stage to conclude what the impacts on water supply and quality might be from the various distribution options.
To conserve and enhance biodiversity	?	(X)	X	As the plan period progresses more greenfield land will be needed (which typically has higher biodiversity value), whilst areas of highest biodiversity value would be protected there is likelihood that there will be a loss of habitats and connectivity of habitats which would need to be mitigated as far as possible.
To protect and enhance the high quality natural and built environment	✓	(✓)	?	This option should have beneficial effects for this SA Objective as it is reinforcing the existing (historic) settlement pattern and hierarchy of settlements. Other options will ensure the design quality minimises any negative effects on the AONB and historic settlements. Uncertainty over the long term of the impact to individual settlements. For example Rye is of significant historic importance and is severely constrained in development terms due to environmental designations and flood risk and the level of growth that may be required through this option could change the character of this town. Mitigation may be required to modify certain settlements growth quota.
To reduce waste generation and disposal, and achieve the sustainable management of waste	?	?	?	There may be some variations in waste generation due to distribution patterns and variations in existing opportunities for the sustainable management of waste across the District – however new development design should incorporate facilities for the separation and collection of materials for recycling.
Conformity with other policy/initiatives: PPS7 Sustainable Development in Rural Areas – this options seeks to locate future growth using recognised sustainability principles				

Non-conformity:

Summary: This distribution option follows general principles of sustainability by seeking to locate new growth in sustainable locations that offer a range of employment, services and facilities that assist reducing the need to travel by car and growth in emissions of greenhouse gases and promotes healthy lifestyles through facilitating walking, cycling and access to leisure. However there are issues that need to be considered surrounding the suitability of some settlements to accommodate the levels of growth that may be required by this distribution pattern. Unclear what the effects would be against the SA Objectives relating to water management, flooding and waste – these will be addressed further down the options hierarchy.

Distribution of Growth Based upon South East Plan Housing Requirements of 280 per Annum

Option 3 – Based on trends of development over the last 5 years – (reflecting market forces in that it is based upon actual completions over the course of the last 5 years)

Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	~	~	~	The distribution options are all based upon the same overall scale of growth (280 per annum) and therefore the overall provision does not change. It has been considered prudent for assessment purposes to assume this batch of options would have neutral effects against this SA Objective.
To improve the health and well-being of the population and reduce inequalities in health	(✓)	(✓)	(✓)	According to the NHS 2007 health profile, life expectancy in Rother is increasing and compared to England averages the health of Rother residents is favourable. It would not appear that trends in development patterns over the last 5 years have been detrimental to health, however access to health facilities will still be better in some areas than others and where services are lacking new growth should aim to redress the balance.
To reduce crime and the fear of crime	~	~	~	
To reduce deprivation and social exclusion	~	~	~	The options for the distribution of housing do not offer significantly different opportunities for addressing deprivation and social exclusion.
To raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	

To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	(✓)	(✓)	The Focus on East Sussex 2008 Annual Monitor (produced by ESCC) indicates that as a whole the county's economy is not performing well, though skills levels have improved across the county. Allowing the continuation of new growth based upon trends of development over the last five years would result in a high amount of growth in the villages which could support growth in the rural, land based economy. However if the aim for the District is to encourage innovation and higher skilled employment activities in the main service centres then this option may not contribute as significantly to that.
To improve accessibility to services and facilities for all ages across the District	(✓)	(✓)	(✓)	The development trends over the last 5 years have to a certain extent reflected population distribution. Over 30% of development has been small-site windfalls, which due to planning policy are mostly within urban and populated areas. Therefore a continuation of this trend would provide opportunities for improving accessibility where greater numbers of the population reside, including in the villages.
To encourage and facilitate increased engagement in cultural and leisure activities	(✓)	(✓)	(✓)	Focussing future growth distribution on past trends should have a positive effect on this SA Objective as growth has generally occurred in existing settlements which have a range of cultural and leisure activities, and new growth can contribute to improving accessibility to such facilities or to the improvement in their quantity and quality.
To improve efficiency in land use and encourage the prudent use of natural resources	?	(X)	X	Future growth requirements cannot continue to rely on windfalls and this distribution option would require the allocation of a significant amount of greenfield land as most settlements within the rural area have tight development boundaries and a lack of previously developed sites.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	?	(X)	(X)	As with option 1 this option would deliver a large proportion of development to the villages where there is a likelihood of greater car use than within the urban areas. People are likely to travel to the larger settlements for some or all of their

				requirements including, education, employment shopping etc.
To reduce emissions of Greenhouse gases	(X)	X	X	This distribution of development is likely to encourage car use, given the proportion of development that would be delivered in the rural part of the District.
To minimise the risk of flooding and resulting detriment to people and property	?	?	?	SFRA to Guide development.
To maintain, improve and manage water resources in a sustainable way	?	?	?	It is not possible at this stage to conclude what the impacts on water supply and quality might be from the various distribution options.
To conserve and enhance biodiversity	?	X	X	This option would require the allocation of a number of greenfield sites on the edges of rural settlements which could have negative effects including habitat loss and habitat connectivity decline.
To protect and enhance the high quality natural and built environment	?	X	X	This option is likely to give rise to unacceptable levels of change within the AONB and may not be judged to minimise adverse impact on landscape setting of settlements within and adjacent to the AONB.
To reduce waste generation and disposal, and achieve the sustainable management of waste	?	?	?	There may be some variations in waste generation due to distribution patterns and variations in existing opportunities for the sustainable management of waste across the District – however new development design should incorporate facilities for the separation and collection of materials for recycling.
Conformity with other policy/initiatives: Adopted Local Plan 2006				
Non-conformity: PPS7 – development in rural areas should be based upon sustainable development principles – future growth under this option would not be considering sustainability principles first, but trends				
Summary: This option has similar effects to option 1 as to a greater extent it reflects existing population patterns and development boundaries because over 30% of this development has been small-site windfalls which due to the nature of current planning policy are within urban development boundaries. If the Council wished to continue this trend it would need to allocate land rather than rely on windfall and this would necessarily require a significant proportion of greenfield land which has negative implications for the SA Objectives to improve efficiency in land use, reduce road congestion, air pollution and greenhouse gas emissions and to conserve and enhance biodiversity and the high quality natural and built environments.				

Distribution of Growth Based upon South East Plan Housing Requirements of 280 per Annum

Option 4 – Based on Local Plan Strategy to 2007 - 2011 (a continuation of the current policy approach as set out in the Local Plan adopted in 2006)

Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	~	~	~	The distribution options are all based upon the same overall scale of growth (280 per annum) and therefore the overall provision does not change. It has been considered prudent for assessment purposes to assume this batch of options would have neutral effects against this SA Objective.
To improve the health and well-being of the population and reduce inequalities in health	(✓)	(✓)	(✓)	This option based upon the Local Plan Strategy is broadly comparable with option 2 the service centre-led approach. However the option sees higher growth directed to Battle and the villages and lower level to Bexhill (though the North East Bexhill SPD area would deliver greater growth post 2011). Need to ensure through the next level options that development distributed in the villages does not exacerbate inequalities in health.
To reduce crime and the fear of crime	~	~	~	
To reduce deprivation and social exclusion	~	~	~	The options for the distribution of housing do not offer significantly different opportunities for addressing deprivation and social exclusion.
To raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	

To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	(✓)	(✓)	(✓)	The Local Plan Strategy aims to deliver growth in a sustainable fashion to service centre settlements and the villages to support existing economies both urban and rural economies.
To improve accessibility to services and facilities for all ages across the District	(✓)	(✓)	(✓)	Whilst the option to some extent focuses on the service centres for growth, which are generally accessible it still directs a relatively high (3 rd highest option) to the villages. This could serve to support local services and facilities and consequently improve access. To improve beneficial effects at the next level of options growth should be considered in relation to improving accessibility for residents to services and facilities.
To encourage and facilitate increased engagement in cultural and leisure activities	(✓)	(✓)	(✓)	The option directs the most growth of all the options to Battle, which is recognised for its cultural assets. Still a relatively high proportion of growth directed to the villages and depending on the next level distribution this may or may not improve accessibility to cultural and leisure facilities.
To improve efficiency in land use and encourage the prudent use of natural resources	(X)	X	X	The projection for development on PDL based upon Local Plan allocations and commitments sites is approximately 50% PDL over the Plan period. Projecting the Local Plan strategy forward would require a significant proportion of greenfield land to be identified as PDL opportunities within or adjacent to development boundaries (Strategy approach) are scarce. The option also directs a relatively significant proportion of development to the villages which would most likely require significant greenfield land take.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	?	(X)	(X)	As with option 3 this option would deliver a relatively large proportion of development to the villages where there is a likelihood of greater car use than within the urban areas. People are likely to travel to the larger settlements for some or all of their requirements including, education, employment shopping etc. Furthermore this option directs the highest levels of growth of all the options to Battle, which has significant traffic and congestion issues.

To reduce emissions of Greenhouse gases	(X)	X	X	This distribution of development is likely to encourage car use, given the proportion of development that would be delivered in the rural part of the District and outside development boundaries where access to a range of travel choices could be reduced.
To minimise the risk of flooding and resulting detriment to people and property	?	?	?	SFRA to Guide development.
To maintain, improve and manage water resources in a sustainable way	?	?	?	It is not possible at this stage to conclude what the impacts on water supply and quality might be from the various distribution options.
To conserve and enhance biodiversity	?	X	X	This option would require the allocation of a number of greenfield sites on the edges of rural settlements (and particularly Battle) which could have negative effects including habitat loss and habitat connectivity decline.
To protect and enhance the high quality natural and built environment	?	X	X	This option is likely to give rise to unacceptable levels of change within the AONB and may not be judged to minimise adverse impact on landscape setting of settlements within and adjacent to the AONB.
To reduce waste generation and disposal, and achieve the sustainable management of waste	?	?	?	There may be some variations in waste generation due to distribution patterns and variations in existing opportunities for the sustainable management of waste across the District – however new development design should incorporate facilities for the separation and collection of materials for recycling.
Conformity with other policy/initiatives: ESCC and Brighton & Hove Structure Plan 1991-2011				
Non-conformity:				
Summary: The current strategy approach is broadly speaking looking to locate development as sustainably as possible by focussing development within or on the edge of existing settlements with service centre roles. However, there is a relatively large proportion of development directed to the villages –at this level of option appraisal it is unclear what the distribution between the villages may look like and how sustainable the resultant distribution may be. This will be investigated at the next tier of options. This option would be likely to give rise to negative effects on the SA Objective to reduce congestion, particularly given the current congestion problems in Battle and Rye and the relatively poor transport infrastructure in the District. The option may be encouraging car use due to the level of				

growth focussed at the villages and have associated negative effects for the Objective to reduce greenhouse gas emission, including from transport. There is a likelihood of adverse effects on conserving and enhancing biodiversity and the high quality built and natural environments.

Distribution of Growth Based upon South East Plan Housing Requirements of 280 per Annum

Option 5 – Based on Housing Needs Assessment 2005

Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	~	~	~	The distribution options are all based upon the same overall scale of growth (280 per annum) and therefore the overall provision does not change. It has been considered prudent for assessment purposes to assume this batch of options would have neutral effects against this SA Objective.
To improve the health and well-being of the population and reduce inequalities in health	✓	✓	✓	This option is based upon locational preferences expressed by concealed households; the resulting distribution would deliver higher levels to Battle and particularly Rye than the other options. As this distribution is 'need driven' it could be argued to result in more positive effects for improving health and well-being as perceived well-being (often circumstance based) is an important part of overall health considerations. The option therefore delivers growth to where residents perceive it is needed.
To reduce crime and the fear of crime	~	~	~	
To reduce deprivation and social exclusion	~	~	~	The options for the distribution of housing do not offer significantly different opportunities for addressing deprivation and social exclusion.
To raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	

To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	?	?	?	This distribution directs less growth to Bexhill than the other options, given that this is the urban centre and economic focus of the District this growth may not be enough to advance its economy in line with aspirations. Is the level of growth directed to the villages enough to sustain the rural economy? Does locational preference stated indicate a desire to live closer to places of employment? If so would this be a positive aspect for the economy?
To improve accessibility to services and facilities for all ages across the District	✓	✓	✓	Given that this option is based upon information generated from residents expressed preferences, it could be considered to represent preferences in respect of living closer to the services and facilities they utilise.
To encourage and facilitate increased engagement in cultural and leisure activities	✓	✓	✓	The option directs a significant proportion of growth collectively to Bexhill, Battle and Rye where access to cultural and leisure facilities is good. This option would deliver the highest growth levels to Battle and Rye of all the options and these two market towns have significant cultural infrastructure.
To improve efficiency in land use and encourage the prudent use of natural resources	(X)	(X)	(X)	The large proportion of growth directed to the market towns will require the development of greenfield land outside the current development boundaries which may not be considered a prudent use of natural resources or efficient use of land
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(X)	X	X	The two market towns currently experience problems of congestion and delivering the levels of growth suggested by this option is likely to exacerbate the situation and lead to deterioration in air quality.
To reduce emissions of Greenhouse gases	(X)	X	X	As much of the development to accommodate this level of growth in the market towns would require sites outside the development boundaries this will not necessarily present significant options to reduce greenhouse gas emissions by encouraging modes of transport other than the car. Mitigation in the form of green travel plans and ensuring delivery of cycle ways and pedestrian routes could reduce the impacts.

To minimise the risk of flooding and resulting detriment to people and property	?	?	?	SFRA to Guide development.
To maintain, improve and manage water resources in a sustainable way	?	?	?	It is not possible at this stage to conclude what the impacts on water supply and quality might be from the various distribution options.
To conserve and enhance biodiversity	?	X	X	This option would require the allocation of a number of greenfield sites on the edges of settlements which could have negative effects including habitat loss and habitat connectivity decline.
To protect and enhance the high quality natural and built environment	?	X	X	Particular concern over the market towns and conserving and enhancing their important, high quality built environments and their high quality natural environment settings.
To reduce waste generation and disposal, and achieve the sustainable management of waste	?	?	?	There may be some variations in waste generation due to distribution patterns and variations in existing opportunities for the sustainable management of waste across the District – however new development design should incorporate facilities for the separation and collection of materials for recycling.
Conformity with other policy/initiatives: broadly in line with PPS7 objective to <i>“focus most development in, or next to, existing towns and villages”</i> . Housing Needs Assessment 2005				
Non-conformity:				
Summary: As the option is based on locational preferences expressed by District residents it is assumed there would be a link between such locations and health and well-being, and accessibility to services and facilities as well as cultural and leisure facilities. The level of growth this option would direct to the market towns however could result in adverse effects on the SA Objectives to ensure efficient use of land and resources, to reduce congestion and improve air quality, to reduce greenhouse gases, to conserve and enhance biodiversity, the built and natural environments.				

BEXHILL

Strategy Options Bexhill

Option 1 Maintain Bexhill's Role (low-medium growth level; main areas of change – north-east and north west Bexhill; strategy emphasis: efficient urban area; regeneration of parts of town, facilities and environment)

Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	✓	(✓)	?	Option would deliver a level of dwellings that in the short and medium term would have a positive effect on ensuring everyone has the opportunity to live in affordable home. Question mark over whether the option would continue to deliver at the required rate in the long term.
To improve the health and well-being of the population and reduce inequalities in health	(✓)	(✓)	?	It is acknowledged that decent and affordable housing can have positive effects on improving the health and well-being of the population; therefore this option would be likely to have positive effects on the population's health and well-being, particularly in the short to medium term.
To reduce crime and the fear of crime	~	~	~	
To reduce deprivation and social exclusion	(✓)	(✓)	(✓)	Option includes an element of regeneration and the focus on urban efficiency and improving facilities and the environment which should collectively produce positive effects on reducing deprivation and social exclusion, which are particularly acute in parts of Bexhill.
To raise educational achievement levels and develop the opportunities for lifelong learning	(✓)	(✓)	(✓)	The level of growth and the regeneration component of this option should both support this SA Objective. The level of growth should ensure new education facilities which will be of high quality and uplift in social cohesion as a result of

				regeneration should contribute to improved attainment in schools.
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	(✓)	(✓)	?	This option presents more limited opportunities for economic growth and demographic change to support that growth than option 2. However the level of growth and regeneration element of this option should have positive effects on this SA Objective in the short and medium term.
To improve accessibility to services and facilities for all ages across the District	(✓)	(✓)	(✓)	The option aims to create an efficient urban area which would include efficient travel within the town by means of transport other than the car – so as to ensure maximum accessibility for everyone.
To encourage and facilitate increased engagement in cultural and leisure activities	(✓)	(✓)	(✓)	Option includes the regeneration of parts of the town, its facilities and environment – this should aim to improve accessibility to cultural and leisure activities.
To improve efficiency in land use and encourage the prudent use of natural resources	(X)	(X)	X	Whilst the option seeks to make efficient use of land through regeneration opportunities the option requires a significant amount of greenfield land to the north-east and north-west of Bexhill.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(X)	(X)	X	The option would require the building of a new road from Bexhill to Hastings to facilitate the development at north-east Bexhill and a further access road from this new road to service north-west Bexhill. Whilst this may in the short to medium term serve to reduce congestion levels, it does not encourage reduced car usage and air pollution levels would be likely to increase due to the new roads.
To reduce emissions of Greenhouse gases	(X)	(X)	X	Correspondingly this option is likely to have adverse effects on reducing emissions of greenhouse gases.
To minimise the risk of flooding and resulting detriment to people and property	✓	✓	✓	The strategic locations for development lie outside the floodplain which will serve to increase the proportion of people living outside areas of high risk of flooding.
To maintain, improve and manage water resources in a sustainable way	?	?	?	All new development should be built with water efficiency in mind. Unclear at this stage whether there will be any issues

				with water supply or treatment.
To conserve and enhance biodiversity	(X)	(X)	X	The strategic sites and site for the new road are all greenfield land which will have a biodiversity value. Mitigation should consider habitat creation and enhancement where possible.
To protect and enhance the high quality natural and built environment	✓	✓	✓	Opportunities within this option to enhance the built and natural environment through regeneration of the environment within the urban area and natural environment enhancements on the urban fringes.
To reduce waste generation and disposal, and achieve the sustainable management of waste	(X)	(X)	X	This level of growth will not reduce waste generation and disposal in the District. The sustainable management of waste would be expected in construction and would desirably be incorporated into site and scheme design.
Conformity with other policy/initiatives: Draft South East Plan and Sussex Coast Sub Region focus				
Non-conformity:				
Summary: Due to the level of growth attached to this option and the regeneration elements it should have positive effects for housing, health, social inclusion, accessibility and protecting and enhancing the character of the town. As the strategic growth areas are all greenfield land the option would be likely to have adverse effects on biodiversity and the efficient use of land. The new road associated with this option may in the short to medium term help relieve congestion in the long term there are likely to be negative effects on air pollution and it does not reduce car usage.				

Strategy Options Bexhill

Option 2 Expand Bexhill's Role (scale of growth: large; main areas of change: north (north-east and north-west) and west Bexhill and town centre; strategy emphasis: new transport infrastructure; retail growth; new facilities; major public realm projects)

Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	✓	✓	✓	The scale of growth associated with this option should ensure that everyone has the opportunity to live in an affordable home.
To improve the health and well-being of the population and reduce inequalities in health	✓	✓	✓	Associated links with decent, affordable housing; opportunity for new facilities with this option which could include health facilities as well as new pedestrian and cycle routes which can encourage healthy lifestyles.
To reduce crime and the fear of crime	~	~	~	
To reduce deprivation and social exclusion	✓	✓	✓	Major opportunities to address deprivation through regeneration and new growth areas enabling new facilities and major public realm projects which can significantly improve living environments and opportunities.
To raise educational achievement levels and develop the opportunities for lifelong learning	✓	✓	✓	The higher growth level and associated infrastructure with this option would enable new high quality facilities to be built. Option supports economic step change and growth in job opportunities should facilitate raising aspirations of those in education and consequently achievement levels. Improvements in links between schools and businesses possible.

To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	✓	✓	✓	Option presents significant opportunities for economic growth
To improve accessibility to services and facilities for all ages across the District	✓	✓	✓	In addition to new facilities and services that could be provided through this strategy option, new transport infrastructure would improve accessibility across the Town.
To encourage and facilitate increased engagement in cultural and leisure activities	✓	✓	✓	Option includes an element focused on public realm improvements and major projects – adding to the cultural offer of Bexhill. New facilities and new transport infrastructure should both serve to encourage and facilitate engagement in cultural and leisure activities.
To improve efficiency in land use and encourage the prudent use of natural resources	X	X	X	This option would require the loss of a significant amount of greenfield land on the fringes of Bexhill for mixed use development and for new road infrastructure.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(X)	X	X	This level of expansion and the associated new roads around Bexhill would not ensure air quality continues to improve. Travel choice may favour the car to commute out from Bexhill from fringe settlements and in time road congestion would be likely to increase as new roads attract traffic.
To reduce emissions of Greenhouse gases	(X)	X	X	Correspondingly this option is likely to have negative effects on reducing emissions of greenhouse gases due to high development rates and increased road infrastructure.
To minimise the risk of flooding and resulting detriment to people and property	✓	✓	?	Most of the strategic areas for growth around Bexhill are not considered at risk from flooding. There is a question mark for the longer term as there is an area at risk from flooding in the strategic area of search at west Bexhill near Little Common. Mitigation in the form of creating a buffer zone along the water course which could be a wildlife corridor with stream-side walk may be sufficient.
To maintain, improve and manage water resources in a sustainable way	?	?	?	All new development should be built with water efficiency in mind. Unclear at this stage whether there will be any issue with water supply or treatment. Concerning water treatment

				and run-off issues for sites to the west of Bexhill – need to ensure no adverse impact on Pevensy Levels Ramsar site.
To conserve and enhance biodiversity	(X)	X	X	The strategic sites and the sites for new road infrastructure are greenfield land which will have biodiversity value. The sites to the west of Bexhill would require new road infrastructure which would be likely to pass through woods of high biodiversity value.
To protect and enhance the high quality natural and built environment	(✓)	(✓)	(✓)	The option presents significant opportunities for improving the built environment through public realm projects, regeneration and sensitive new development. There are also opportunities to improve the urban fringes and their interaction with the surrounding countryside by providing green corridor links. Need to ensure no detrimental effects on the AONB, landscape setting and archaeology.
To reduce waste generation and disposal, and achieve the sustainable management of waste	X	X	X	This level of growth will not reduce waste generation and disposal in the District. The sustainable management of waste would be expected in construction of new development and infrastructure and would desirably be incorporated into site and scheme designs.
Conformity with other policy/initiatives: Draft South East Plan and particularly the economic focus for the Sussex Coast Sub Region				
Non-conformity:				
Summary: This option presents significant opportunities for providing affordable homes, improving health, deprivation, accessibility, educational attainment and for meeting the regional aspiration for economic growth in the Sussex Coast Sub region. As might be expected with a higher growth option there is a likelihood of adverse effects against the 'environmental' SA Objectives including efficiency in land use, reducing greenhouse gas emissions, improving air quality, conserving and enhancing biodiversity and reducing waste generation. Mitigation proposals could lessen the significance of effects but there will need to be some acceptance that there are negative aspects to higher growth aspirations.				

Strategy Options Bexhill

Option 3 Coordinated Approach to the Bexhill / Hastings Area (scale of growth: medium to large; main areas of change: north (north-east and north-west) Bexhill and west Hastings, Hastings town centre, Pebsham Park, Bulverhythe and Ravenside; strategy emphasis: a shared catchment, green heart, cross boundary infrastructure including Wilting Station and bus corridors)

Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	✓	✓	✓	The scale of growth associated with this option should ensure that everyone has the opportunity to live in an affordable home.
To improve the health and well-being of the population and reduce inequalities in health	✓	✓	✓	Associated links with decent, affordable housing; opportunity for new facilities with this option which could include health facilities as well as new pedestrian and cycle routes which can encourage healthy lifestyles.
To reduce crime and the fear of crime	~	~	~	
To reduce deprivation and social exclusion	?	?	?	Does the coordinated approach weaken the opportunity to focus on regenerating Bexhill which currently has pockets of high deprivation?
To raise educational achievement levels and develop the opportunities for lifelong learning	?	?	?	Would the shared focus, in terms of access to education, favour the east of Bexhill to the detriment of Bexhill as a whole? If there were to be efficiencies in delivering new facilities associated with education and life long learning would these be focused in Hastings or Rother?
To sustain economic growth and competitiveness and encourage innovation	(✓)	(✓)	(✓)	Option presents significant opportunities for economic growth as part of the economic uplift of the Hastings Bexhill area

in higher value, lower impact activities				however need to ensure focus is not too Hastings-heavy and that the needs and aspirations of Bexhill are addressed.
To improve accessibility to services and facilities for all ages across the District	(✓)	(✓)	(✓)	Whilst this option may present efficiencies in delivering facilities – these could be focused on the east side of Bexhill which may not benefit the residents in the west of Bexhill. Transport infrastructure including new road infrastructure, Wilting station and bus corridors could facilitate movements between Bexhill and Hastings and accessibility to services and facilities – particularly for those in central or eastern parts of Bexhill and those commuting to Hastings.
To encourage and facilitate increased engagement in cultural and leisure activities	✓	✓	✓	Option includes the creation of a new countryside park at Pebsham and improved leisure facilities at Ravenside.
To improve efficiency in land use and encourage the prudent use of natural resources	X	X	X	This option would require the loss of a significant amount of greenfield land on the fringes of Bexhill and Hastings for mixed use development and for new road infrastructure.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(X)	(X)	X	This level of expansion and the associated new roads around Bexhill and Hastings would not ensure air quality continues to improve. Travel choice may favour the car to commute out from Bexhill and Hastings from fringe settlements and in time road congestion would be likely to increase as new roads attract traffic. Option is somewhat mitigated by new station at Wilting serving the new development there with links to London (via Battle and Tunbridge Wells).
To reduce emissions of Greenhouse gases	(X)	X	X	Correspondingly this option is likely to have negative effects on reducing emissions of greenhouse gases due to high development rates and increased road infrastructure.
To minimise the risk of flooding and resulting detriment to people and property	✓	✓	?	Most of the strategic areas for growth around north east Bexhill and west Hastings are not considered at risk from flooding. There is a question mark for the longer term as Bulverhythe is at risk from flooding and these issues would need to be resolved with the EA prior to any consent.

To maintain, improve and manage water resources in a sustainable way	?	?	?	All new development should be built with water efficiency in mind. Unclear at this stage whether there will be any issue with water supply or treatment.
To conserve and enhance biodiversity	(X)	(X)	(X)	The strategic sites and the sites for new road infrastructure are greenfield land which will have biodiversity value. The greenfield land take could be considered to be partly mitigated by the creation of the Pebsham countryside park which would seek to create habitats in the place of the current landfill site.
To protect and enhance the high quality natural and built environment	(✓)	(✓)	(✓)	The option presents opportunities to improve the urban fringes and their interaction with the surrounding countryside and provide green corridor links. Need to ensure no detrimental effects on the AONB, landscape setting and archaeology.
To reduce waste generation and disposal, and achieve the sustainable management of waste	X	X	X	This level of growth will not reduce waste generation and disposal in the District. The sustainable management of waste would be expected in construction of new development and infrastructure and would desirably be incorporated into site and scheme designs.
Conformity with other policy/initiatives: Draft South East Plan and particularly the Sussex Coast Sub Region part of the Plan				
Non-conformity:				
Summary: There is more uncertainty associated with this option particularly around the option's ability to address deprivation issues in Bexhill and the need to raise educational attainment. The option could be considered to weaken the identity of Bexhill as the focus tends to be Hastings-led and the major improvements would be seen in Hastings and on the east of Bexhill – so the option doesn't necessarily consider the holistic needs of Bexhill as its own entity. Similar issues surrounding efficiency in land use, conserving biodiversity and generation of waste.				

BATTLE

Strategy Options Battle

Option 1 Continue to Support the Market Town Role of Battle (scale of growth: medium; main areas of change: the east and west avoiding central areas to the southwest and northeast of the high street; strategy emphasis: growth in service centre role, economic opportunities and housing choice)

Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	✓	✓	✓	This option should provide enough new housing to allow everybody the choice and opportunity to live in a decent and affordable home.
To improve the health and well-being of the population and reduce inequalities in health	✓	✓	✓	Housing choice and affordability has close links with the health and well-being of the population. Furthermore this level of growth should help secure the new health facilities identified as needed by the PCT in a timely fashion.
To reduce crime and the fear of crime	~	~	~	
To reduce deprivation and social exclusion	✓	✓	✓	Deprivation is not identified as a specific issue in Battle. Option would enable growth in the service centre role which should result in an improvement in job opportunities and social and education facilities which should positively address this objective.
To raise educational achievement levels and develop the opportunities for lifelong learning	✓	✓	✓	Growth level associated with this option is likely to secure the earlier construction of the second primary school.
To sustain economic growth and competitiveness and encourage innovation	✓	✓	✓	The option is designed to facilitate economic growth and enhancement in employment and economic opportunities.

in higher value, lower impact activities				
To improve accessibility to services and facilities for all ages across the District	?	?	?	Whilst the option would enable growth in services and facilities, accessibility is already identified as an issue for Battle and improving accessibility is likely to prove difficult given the layout of the town and the surrounding environmental assets. Options for pedestrian and cycle access routes should be considered a priority.
To encourage and facilitate increased engagement in cultural and leisure activities	✓	✓	✓	Option would increase size of the population in Battle thus increasing the number of people with access to the historical cultural and leisure opportunities in Battle.
To improve efficiency in land use and encourage the prudent use of natural resources	(X)	X	X	This option would require significant greenfield development outside the development boundary and this is not considered to improve efficiency in land use, particularly given Battle's location in the AONB.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(X)	X	X	Congestion is already identified as an issue for Battle and the growth rate associated with this option would likely exacerbate the congestion issues, which will have a direct impact on air quality.
To reduce emissions of Greenhouse gases	(X)	X	X	Correspondingly this is likely to have a negative effect on reducing greenhouse gas emissions.
To minimise the risk of flooding and resulting detriment to people and property	✓	✓	✓	Battle does not have areas at risk from flooding – so new development associated with this option would help to minimise the risk of flooding and resulting detriment to people at a District level.
To maintain, improve and manage water resources in a sustainable way	?	?	?	All new development should be built with water efficiency in mind. Unclear at this stage whether there will be any issue with water supply or treatment.
To conserve and enhance biodiversity	X	X	X	Major opportunities for development with this option are greenfield sites with potentially high biodiversity value. Need to ensure appropriate mitigation and creation of new habitats where possible to compensate for habitat loss due to development.

To protect and enhance the high quality natural and built environment	?	?	?	Unclear at this stage the exact likely locations of any new development and how that would impact upon the historic settlement and the surrounding AONB. Design policies should ensure that new development enhances this special landscape and historic town.
To reduce waste generation and disposal, and achieve the sustainable management of waste	X	X	X	This level of growth will not reduce waste generation and disposal in the District. The sustainable management of waste would be expected in construction of new development and infrastructure and would desirably be incorporated into site and scheme designs.
Conformity with other policy/initiatives: PPS7 Development in Rural Areas				
Non-conformity:				
Summary: This option and its associated level of growth present a good opportunity for Battle to enhance its service centre role and sustain its economic growth, provide enough housing to meet the needs of the growing number of households and raise its educational attainment and encourage engagement in cultural and leisure activities. Due to its location in the AONB, the historic layout of the town and historic and archaeological assets, this level of growth is likely to lead to negative impacts on the environmental assets, as well as the usual negative environmental impacts associated with higher levels of development.				

Strategy Options Battle

Option 2 Limited Growth / Consolidation (scale of growth: low; main areas of change: primarily development and redevelopment within the development boundary; strategy emphasis: making best use of development opportunities within the town to consolidate its role and urban form)

Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	(✓)	(✓)	?	The option could limit the potential for affordable housing provision.
To improve the health and well-being of the population and reduce inequalities in health	(✓)	(✓)	?	The option could limit the potential for service improvements including those service and facilities that relate to health and well-being.
To reduce crime and the fear of crime	~	~	~	
To reduce deprivation and social exclusion	(✓)	(✓)	(✓)	Deprivation and social exclusion are not considered to be a major issue for Battle. Redevelopment opportunities that may be associated with this option should aim to reduce deprivation and social exclusion.
To raise educational achievement levels and develop the opportunities for lifelong learning	?	(✓)	?	There is more limited scope with this option to secure early construction of the second primary school. Question over the long term gains for education provision as incremental infill development may not trigger a requirement for further provision which may result in a long term under provision.
To sustain economic growth and competitiveness and encourage innovation	?	?	?	The options presents more limited scope for economic growth and increased employment opportunities and it is unclear at

in higher value, lower impact activities				this stage whether this level of growth would be sufficient to sustain the desired level of economic growth.
To improve accessibility to services and facilities for all ages across the District	(✓)	?	?	This option presents more limited opportunities for service improvements.
To encourage and facilitate increased engagement in cultural and leisure activities	(✓)	(✓)	?	Short and medium term beneficial effects may be considered likely through development opportunities enabling greater numbers of households to have access to the cultural and leisure facilities within Battle.
To improve efficiency in land use and encourage the prudent use of natural resources	(X)	?	(✓)	Short to medium term this option would deliver growth on the Blackfriars site which is a greenfield allocation. Option should see more beneficial effects as time progresses as future development opportunities would be focused on infill and redevelopment which are more likely to be found on previously developed sites.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(X)	(X)	(X)	Congestion is highlighted as an issue for Battle and further consolidation of the town and increasing the number of dwellings and households is likely to exacerbate the problems, notwithstanding the general principle of development within town boundaries increasing opportunities for people not to use their cars.
To reduce emissions of Greenhouse gases	(X)	(X)	(X)	The level of growth and resultant potential increase in numbers of households and associated car use would likely have adverse effects on this objective.
To minimise the risk of flooding and resulting detriment to people and property	✓	✓	✓	Battle does not have areas at risk from flooding – so new development associated with this option would help to minimise the risk of flooding and resulting detriment to people at a District level.
To maintain, improve and manage water resources in a sustainable way	?	?	?	All new development should be built with water efficiency in mind. Unclear at this stage whether there will be any issue with water supply or treatment.
To conserve and enhance biodiversity	?	?	(✓)	Short to medium term outcomes for this option may be slightly adverse due to the greenfield development at Blackfriars

				though longer term the confinement of development to within the development boundary could have broadly positive effects for this objective.
To protect and enhance the high quality natural and built environment	(✓)	(✓)	(✓)	This option could limit the extent of change around the fringes of Battle which interact with the AONB. Need to ensure all development respects and enhances the high quality natural and built environment.
To reduce waste generation and disposal, and achieve the sustainable management of waste	(X)	(X)	(X)	This option for lower growth should help to limit the waste generated and particularly where land and buildings can be reused in redevelopment opportunities.
Conformity with other policy/initiatives: PPS7 Development in Rural Areas				
Non-conformity:				
Summary: There is less scope with this option to ensure that everyone has the opportunity to live in an affordable home and for planning gain to help improve local facilities and services – including the early construction of the second primary school. Greater uncertainty in respect of sustaining economic growth and whether a limited growth option would be sufficient to support growth in the local economy. Potential for greater efficiency in land use and less adverse effects for reducing greenhouse gas emissions, congestion, waste generation and improving air quality.				

RYE AND RYE HARBOUR

Strategy Options Rye				
Option 1: Strengthen the Market Town Role of Rye and the Commercial Role of Rye Harbour and the Port of Rye (scale of growth: medium; main areas of change: extension to the development boundary to the north of Rye; extension to employment area to include land west of Rastrum site; regeneration of parts of town including town centre; strategy emphasis growth in service role, employment and economic opportunities)				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	✓	✓	✓	This option presents the best opportunities of the two options to deliver the quantity and choice of accommodation to ensure everyone has the opportunity to live in a decent, affordable home.
To improve the health and well-being of the population and reduce inequalities in health	✓	✓	✓	Housing choice and affordability has close links with the health and well-being of the population. The PCT has not identified a need for additional facilities in Rye, need to ensure where growth levels may put a strain on services that contributions are made to improving and expanding the services available.
To reduce crime and the fear of crime	~	~	~	
To reduce deprivation and social exclusion	✓	✓	✓	Deprivation is identified as an issue for Rye and this option would enable growth in the service centre role of Rye (and provide a good quantity and choice of affordable accommodation) which should result in an improvement in job opportunities and social and education facilities which should positively address this objective.

To raise educational achievement levels and develop the opportunities for lifelong learning	✓	✓	✓	There are new education facilities planned for Rye which should be of higher quality than existing. This level of growth may present further opportunities for educational facilities enhancement and where appropriate consideration should be given to life long learning and adult education opportunities to help tackle deprivation as well as fostering links between education and local businesses.
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	✓	✓	✓	This option is designed to facilitate and stimulate economic growth and enhancement in employment and economic opportunities. The Rye harbour Road employment area has been regenerating itself and presents good opportunities for further growth. The option also seeks to support the Port of Rye which is of great importance to Rye and its fishing and tourism industries.
To improve accessibility to services and facilities for all ages across the District	✓	✓	✓	Regeneration, redevelopment and development through this option would contribute to improving accessibility by providing a greater quantity of services and facilities as well as improvements to and the creation of cycle ways and pedestrian links across the town.
To encourage and facilitate increased engagement in cultural and leisure activities	✓	✓	✓	Rye has a rich cultural scene and has good access to recreational and leisure activities; growth in this area will facilitate increased engagement in such activities.
To improve efficiency in land use and encourage the prudent use of natural resources	(✓)	(X)	(X)	The option would be able to make efficient use of land through the regeneration of Rock Channel, the Town Centre and Rye Harbour Road employment areas, but the long term prospects for accommodating this level of growth would require a substantial amount of greenfield land to the west and north of Rye.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(X)	(X)	X	Congestion is an issue for Rye, which suffers from through traffic and local traffic including a proportion of HGV traffic to and from the Harbour Rd employment area and this level of growth may compound the problem.

To reduce emissions of Greenhouse gases	(X)	(X)	X	Correspondingly this is likely to have an adverse effect on reducing greenhouse gas emissions.
To minimise the risk of flooding and resulting detriment to people and property	(X)	(✓)	(✓)	In the short term the redevelopment of Rock Channel and parts of the town which fall into the EA's flood zones 2 and 3 would not minimise the risk of flooding; in the medium to long term this option would deliver growth in areas outside of flood risk areas.
To maintain, improve and manage water resources in a sustainable way	?	?	?	All new development should be built with water efficiency in mind. Unclear at this stage whether there will be any issue with water supply or treatment.
To conserve and enhance biodiversity	(✓)	(X)	X	Regeneration opportunities in the short term should help conserve the biodiversity in the area. The area has some important biodiversity within internationally designated sites, whilst the option does not propose any development within these sites, the level of growth and ensuing additional number of potential visitors to such sites could place pressure on them – the AA will confirm and mitigate any negative effects. The medium to long term requirements for this level of growth would require a substantial amount of greenfield land which potentially has good biodiversity value.
To protect and enhance the high quality natural and built environment	?	(X)	(X)	Potential for adverse effects due to the need for expansion to accommodate this level of growth. Whilst design policies should help conserve the high quality built environment the level of growth will undoubtedly affect the setting of Rye on the north and west side which will impact upon views to and from the AONB.
To reduce waste generation and disposal, and achieve the sustainable management of waste	X	X	X	This level of growth will not reduce waste generation and disposal in the District. The sustainable management of waste would be expected in construction of new development and infrastructure and would desirably be incorporated into site and scheme designs.
Conformity with other policy/initiatives: PPS7 Development in Rural Areas				

Non-conformity:
Summary: This option and its associated level of growth present a good opportunity for Rye to enhance its service centre role and sustain economic growth, provide enough affordable accommodation and choice of accommodation to meet the growing number of households and raise its educational attainment as well as facilitating engagement in cultural and leisure activities. Due to Rye's significant national historic importance, rich archaeology, ecology and location on the edge of the AONB, this level of growth is likely to lead to adverse impacts on Rye's environmental assets.

Strategy Options Rye				
Option 2: (scale of growth: limited/low; main areas of change: within the development boundary and Rye Harbour employment area focusing on infill and redevelopment opportunities including the Town Centre; strategy emphasis: enhancing social functions and respecting and utilising the important environmental assets)				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	(✓)	(X)	(X)	This option is likely to limit the potential scope for providing affordable housing – the need for which is particularly acute in Rye.
To improve the health and well-being of the population and reduce inequalities in health	?	?	?	There may be particular links between affordable housing provision and health and well-being in Rye. It has high levels of deprivation and particularly child poverty which is likely to have a 'knock-on' effect on health. It is unclear how this option would positively address health if the quantum of affordable housing is not sufficient.
To reduce crime and the fear of crime	~	~	~	Whilst this option has been judged to be neutral there are

				known links between deprivation and crime, regeneration and redevelopment opportunities should ensure 'secured by design' principles are key to designing new facilities.
To reduce deprivation and social exclusion	(✓)	(✓)	?	The regeneration opportunities within this option combined with the focus of facilitating social inclusion should have a positive effect on this objective. Unclear whether this will be sufficient in the long term to reduce deprivation as the area may lack an adequate range of employment and economic opportunities and sufficient good quality affordable housing choices.
To raise educational achievement levels and develop the opportunities for lifelong learning	(✓)	?	?	There are new education facilities planned for Rye which should be of higher quality than existing. Uncertainty for the medium and long term as growth in the economy – the focus of option 1 helps to incentivise children and parents but this option does not present the same opportunities for economic growth. Would be beneficial if good links between education and local business could be fostered and opportunities for life long learning were maximised.
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	(✓)	?	?	The regeneration of Rock Channel and parts of the town should have a positive effect on sustaining economic growth. It is less clear how long term economic growth will be sustained.
To improve accessibility to services and facilities for all ages across the District	(✓)	(✓)	(✓)	The option seeks to maximise opportunities for linking social and employment functions across the town with a good range of cycle and pedestrian routes. The regeneration of Rock Channel proposes riverside walkways and good pedestrian links to the citadel.
To encourage and facilitate increased engagement in cultural and leisure activities	(✓)	(✓)	(✓)	Rye has a rich cultural scene and has good access to recreational and leisure activities; limited growth in this area will still facilitate increased engagement in such activities.
To improve efficiency in land use and encourage the prudent use of natural resources	(✓)	(✓)	(✓)	This option should help to improve efficiency in land use through regeneration and infill opportunities.

To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(✓)	(✓)	(✓)	This level of growth, combined with the urban regeneration and infill focus and resisting urban sprawl should help to locate new residents within easy walking and cycling reach of most of the services and facilities they require and discourage car use. Furthermore the option focuses on providing a good range of pedestrian and cycle ways linking parts of the town.
To reduce emissions of Greenhouse gases	~	~	~	This is judged to be neutral due to potential benefits of reducing car use being offset by building rates and an increase in the number of residences and local facilities and services.
To minimise the risk of flooding and resulting detriment to people and property	(X)	?	?	Some of the regeneration planned in the short term will be located in the EA's flood zones 2 and 3. It is unclear how future infill and redevelopment opportunities will avoid flood zones 2 and 3 and how the planning of new development will deal with emergency planning issues surrounding Rye as a 'dry island'.
To maintain, improve and manage water resources in a sustainable way	?	?	?	All new development should be built with water efficiency in mind. Unclear at this stage whether there will be any issue with water supply or treatment.
To conserve and enhance biodiversity	(✓)	(✓)	(✓)	This option should better help to conserve and enhance biodiversity through lower levels of growth and more constrained growth in that it does not allow for urban sprawl into greenfield sites (barring the current reserve site allocation).
To protect and enhance the high quality natural and built environment	(✓)	(✓)	(✓)	Design policies should ensure that the high quality built environment is preserved and enhanced by new development and this will be particularly important when infilling and intensifying the town. This option prevents further urban sprawl and so preserves views to and from the AONB to a greater extent.
To reduce waste generation and disposal, and achieve the sustainable management of waste	(X)	(X)	(X)	In absolute terms this option would be less adverse as net dwelling gain would be less than option 1 therefore generating less waste in construction and operation. Furthermore the option focuses on infill and redevelopment and should ensure

				where possible that buildings are re-used.
Conformity with other policy/initiatives:				
Non-conformity:				
Summary: There is less scope with this option to ensure that everyone has the opportunity to live in an affordable home and this is particularly important in light of the Housing Needs Assessment identifying a significant need for affordable housing in Rye. The option is generally more positive than option 1 for environmental matters and presents marginally less opportunity for enhancing and addressing social functions and issues.				

RURAL AREAS

Strategy Options Rural Areas				
Option 1: Continue to Focus on Service Centres (main areas of change: rural service centres and to a lesser extent local service villages; strategy emphasis: service role of settlements)				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	~	~	~	The scale of overall growth for the rural villages has been set at the higher level of the options hierarchy and does not change between options. Therefore the overall provision of housing here will be the same. The ability to provide affordable dwellings does not change between options as there are different approaches that can be taken to ensure provision, small rural exception sites could deliver 100% affordable, as well as larger sites providing say 40% affordable.
To improve the health and well-being of	✓	✓	✓	This option seeks to locate growth where there are existing

the population and reduce inequalities in health				health facilities and therefore a greater number of people will benefit from good access to them. Furthermore given the existing health infrastructure is in place expanding the service as a result of new development through additional doctors, dentists, pharmacists, for example is more easily achievable than if new facilities were needed.
To reduce crime and the fear of crime	~	~	~	All new development should follow 'secured by design' principles and minimise future fear of crime issues.
To reduce deprivation and social exclusion	?	?	?	The opportunity exists for new development to address deprivation and social exclusion through regeneration of an area or the provision of much needed facilities for example. The detail of where development will be located specifically is more a matter for the Site Allocations DPD.
To raise educational achievement levels and develop the opportunities for lifelong learning	(✓)	(✓)	(✓)	By locating growth in settlements with educational facilities allows greater numbers of people access to this provision locally. Investment in school facilities may be possible through planning gain which should improve the quality of provision and benefit the wider community.
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	(✓)	(✓)	(✓)	This option allows the maximum amount of people to benefit from the provision of services, which in turn increases the economic viability of services themselves. This option then serves to strengthen the economies of the service role settlements.
To improve accessibility to services and facilities for all ages across the District	✓	✓	✓	This option allows the maximum amount of people to benefit from the provision of services.
To encourage and facilitate increased engagement in cultural and leisure activities	✓	✓	✓	In analysing the service role of settlements sports facilities, community halls, libraries, play spaces and places of worship were included. This should mean that locating growth in areas with these provisions should facilitate increased engagement in cultural and leisure activities.
To improve efficiency in land use and encourage the prudent use of natural	?	?	?	Unclear at this stage the options ability to reuse land and buildings – this will be better assessed at Site Allocations.

resources				
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	~	~	Whilst the option seeks to locate residents near to services and facilities and therefore to some job opportunities, it does not take into account transport infrastructure. Therefore it can be assessed as neutral insofar as the positive effects of locating people to reduce their need to travel may be neutralised by poor transport choice and lack of a wider range of job opportunities.
To reduce emissions of Greenhouse gases	(✓)	(✓)	(✓)	The option seeks to locate residents where their need to travel may be reduced and should therefore help to reduce emissions of greenhouse gases. The options beneficial effect may be slightly weakened by encouraging car use through poor transport choice or individual commuter decisions.
To minimise the risk of flooding and resulting detriment to people and property	?	?	?	This will be assessed at Site Allocations.
To maintain, improve and manage water resources in a sustainable way	?	?	?	All new development should be built with water efficiency in mind. Unclear at this stage whether there will be any issue with water supply or treatment.
To conserve and enhance biodiversity	?	?	?	This will be assessed at Site Allocations.
To protect and enhance the high quality natural and built environment	?	?	?	Considering the rural villages and AONB holistically it could be argued that focusing development in existing service centres helps preserve the AONB by restricting growth to a few key settlements. The counter argument to this is that the rest of the villages within the District and AONB would suffer decline due to lack of investment and growth to support them.
To reduce waste generation and disposal, and achieve the sustainable management of waste	(✓)	(✓)	(✓)	This option could have beneficial effects for reducing waste generation as focussing on existing service centres means greater opportunities to upgrade existing infrastructure rather than constructing new – which could be more waste intensive.
Conformity with other policy/initiatives: PPS7 Development in Rural Areas; The Preferred option at District-wide level.				
Non-conformity:				

Summary: there are many uncertainties assessing this level of option as detail on precise locations within or around the settlements is still unknown, the impacts would become much clearer at Site Allocations stage. The option performs well in respect of access to services and facilities including health, education, cultural and leisure activities and some job opportunities and consequently has the potential for beneficial effects against the objective to reduce greenhouse emissions. The option has the potential to generate less waste than the other options in this set due the potential for upgrading existing service provision rather than building new.

Strategy Options Rural Areas				
Option 2: Development to Support Community Needs and deficiencies (main area of change: east and north of District centred on Rye and Ticehurst – no need in centre of District; strategy emphasis: led by housing needs with secondary emphasis need for supporting services)				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	~	~	~	The scale of overall growth for the rural villages has been set at the higher level of the options hierarchy and does not change between options. Therefore the overall provision of housing here will be the same. The ability to provide affordable dwellings does not change between options as there are different approaches that can be taken to ensure provision, small rural exception sites could deliver 100% affordable, as well as larger sites providing say 40% affordable.

To improve the health and well-being of the population and reduce inequalities in health	(✓)	(✓)	(✓)	Theoretically this option could have beneficial effects for the health and well-being of the population as it would be providing for need as identified by residents' preferences. This being the case perceived health and well-being should increase given the known links between good accommodation and health. However the access to health facilities may not be as good as with other options, though clearly there could be room to improve the provision with the right level of growth.
To reduce crime and the fear of crime	~	~	~	All new development should follow 'secured by design' principles and minimise future fear of crime issues.
To reduce deprivation and social exclusion	(✓)	(✓)	(✓)	The opportunity exists for new development to address deprivation and social exclusion through regeneration of an area or the provision of much needed facilities for example. There are high levels of deprivation in Rye – where this option would direct a significant proportion of growth. The component of this option that seeks to locate growth where there is an identified need for supporting services in order to secure such services could also help to reduce social exclusion through improved accessibility.
To raise educational achievement levels and develop the opportunities for lifelong learning	?	?	?	The provision of or improvements to education facilities is triggered by a set level of growth which may not be reached in some locations with this option and consequent pressure could be placed on existing provision.
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	?	?	?	This option relies on need identified by residents themselves, which may be based upon work place orientation, their choice of school or other amenity issues such as visual attraction to a place, recreational facilities etc. It is unclear how this pattern of development will support economic growth.
To improve accessibility to services and facilities for all ages across the District	(X)	(X)	(X)	Potentially negative effects against this objective because this option directs development towards where services are lacking. Whilst there may be some opportunities to deliver new services and facilities alongside development this will not

				always be the case.
To encourage and facilitate increased engagement in cultural and leisure activities	?	?	?	There could be mixed results for progress against this objective because in some areas, for example Rye, where a strong 'need' is identified there is good provision in cultural and leisure facilities, but this may not be the case for other preferential locations.
To improve efficiency in land use and encourage the prudent use of natural resources	?	?	?	Unclear at this stage the options ability to reuse land and buildings – this will be better assessed at Site Allocations.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	?	?	?	Unclear the exact nature of locations across the District and how this will effect car movements, commuter patterns, public transport use etc. There are known congestion problems in Rye and the location of development here should consider minimising the impacts on the road network through good pedestrian and cycle access to service and facilities including public transport. Potential for increased car movements District wide as people travel to service centres for their work and life needs.
To reduce emissions of Greenhouse gases	(X)	(X)	(X)	Potential for adverse effects against the objective to reduce greenhouse gas emissions due to the potential for increased trips by car to reach everyday services and facilities. Furthermore potential for increased construction due to the need to provide facilities in some cases and increased emissions associated with construction and operation of these new facilities.
To minimise the risk of flooding and resulting detriment to people and property	?	?	?	This will be assessed at Site Allocations.
To maintain, improve and manage water resources in a sustainable way	?	?	?	All new development should be built with water efficiency in mind. Unclear at this stage whether there will be any issue with water supply or treatment.
To conserve and enhance biodiversity	?	?	?	This will be assessed at Site Allocations.

To protect and enhance the high quality natural and built environment	?	?	?	Unclear at this stage the final distribution of growth and how it will effect the high quality natural and built environment. The potential for Rye to accommodate significant levels of growth for example are severely constrained by its environmental assets including high quality built environment.
To reduce waste generation and disposal, and achieve the sustainable management of waste	(X)	(X)	(X)	This option has greater potential than option 1 to have adverse effects for reducing waste generation as there is a likelihood of building more new facilities which will generate waste in construction and operation.
Conformity with other policy/initiatives:				
Non-conformity: PPS7 Development in Rural Areas				
Summary: there are many uncertainties assessing this level of option as detail on precise locations within or around the settlements is still unknown, the impacts would become much clearer at Site Allocations stage. There is potential for beneficial effects for improving health and well being and reducing social exclusion. There is potential for adverse effects on reducing greenhouse gas emissions and waste arising due to the likely need to build and operate a supply of new facilities.				

Strategy Options Rural Areas				
Option 3: Focus development of Few Larger Villages (main areas of change: Robertsbridge, Northiam, Ticehurst, Hurst Green; strategy emphasis: settlements with service role and good accessibility)				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	~	~	~	The scale of overall growth for the rural villages has been set at the higher level of the options hierarchy and does not change between options. Therefore the overall provision of

				housing here will be the same. The ability to provide affordable dwellings does not change between options as there are different approaches that can be taken to ensure provision, small rural exception sites could deliver 100% affordable, as well as larger sites providing say 40% affordable.
To improve the health and well-being of the population and reduce inequalities in health	~	~	~	Concentrating development in a few larger villages would ensure new residents had good access to health facilities; however the effect is marked as neutral as the option does not consider the potential and needs of other villages and their populations.
To reduce crime and the fear of crime	~	~	~	All new development should follow 'secured by design' principles and minimise future fear of crime issues.
To reduce deprivation and social exclusion	?	?	?	The opportunity exists for new development to address deprivation and social exclusion through regeneration of an area or the provision of much needed facilities for example.
To raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	The villages at the focus of this option are concentrated in the north and northeast of the District, so if educational facilities in these villages were to be upgraded the benefits would only be felt by those areas served by these four villages. There is not a good geographical spread across the rural villages' area so whilst there would be some localised benefits – considering the whole of the rural villages' area – the effects are judged to be neutral.
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	?	?	?	The four villages at the focus of this option are recognised as providing greater access to jobs than others, so in terms of supporting these economies the option performs well. However, restricting development across the rest of the rural area could be detrimental to the rural economy as a whole.
To improve accessibility to services and facilities for all ages across the District	~	~	~	Whilst the option aims to focus development in four villages with greater access to services than others and with better public transport links it cannot address service provision in the

				other villages which cover a large geographical area. Therefore the benefits that may be possible in some areas are neutralised when considering the rural area as a whole.
To encourage and facilitate increased engagement in cultural and leisure activities	~	~	~	Similar issues arise with this objective; whilst there may be some benefits in the locality of new development a large area of the District is neglected.
To improve efficiency in land use and encourage the prudent use of natural resources	?	?	?	Unclear at this stage the options ability to reuse land and buildings – this will be better assessed at Site Allocations.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	~	~	The option considers public transport provision and focuses on areas well served by public transport, theoretically resulting in beneficial effects for improving travel choice. This is somewhat counterbalanced by the fact that all new provision of facilities will be focused in the north and northeast of the rural area potentially encouraging car use from other areas where public transport options are reduced or more cumbersome than taking the car.
To reduce emissions of Greenhouse gases	(X)	(X)	(X)	Due to the geographical concentration of the villages identified for growth in this option there is a likelihood that car use will continue to increase in the rest of the rural area which would have a negative effect on reducing greenhouse gas emissions.
To minimise the risk of flooding and resulting detriment to people and property	?	?	?	This will be assessed at Site Allocations.
To maintain, improve and manage water resources in a sustainable way	?	?	?	All new development should be built with water efficiency in mind. Unclear at this stage whether there will be any issue with water supply or treatment.
To conserve and enhance biodiversity	?	?	?	This will be assessed at Site Allocations.
To protect and enhance the high quality natural and built environment	?	?	?	Considering the rural villages and AONB holistically it could be argued that focusing development in four key villages helps preserve the AONB by restricting growth to a few key settlements. The counter argument to this is that the rest of the villages within the District and AONB would suffer decline

				due to lack of investment and growth to support them.
To reduce waste generation and disposal, and achieve the sustainable management of waste	(✓)	(✓)	(✓)	This option could have beneficial effects for reducing waste generation as focussing on four key villages with good service provision means greater opportunities to upgrade existing infrastructure rather than constructing new – which could be more waste intensive.
Conformity with other policy/initiatives:				
Non-conformity:				
Summary: This option results in a number of neutral effects against SA Objectives – this is often due to the positive and negative effects balancing each other out. This is primarily due the geographical concentration of the four villages which are the focus of development for this option and therefore the relative neglect of a large geographical area of the District – home to a significant number of smaller villages.				

Strategy Options Rural Areas				
Option 4a: Dispersed Development (main areas of change: spread based upon population size between all 45 villages identified in the Rural Settlement Strategy; strategy emphasis: manageable growth at a greater number of settlements and reinforcing historic pattern of development within High Weald AONB)				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	~	~	~	The scale of overall growth for the rural villages has been set at the higher level of the options hierarchy and does not change between options. Therefore the overall provision of housing here will be the same. The ability to provide

				affordable dwellings does not change between options as there are different approaches that can be taken to ensure provision, small rural exception sites could deliver 100% affordable, as well as larger sites providing say 40% affordable.
To improve the health and well-being of the population and reduce inequalities in health	?	?	?	Unclear how this option would address the health and well-being of the rural population. Whilst there could clearly be some benefits to villages where the level of development leads to improvements in health facilities – or health facilities where there were none; there may also be a number of settlements where growth levels are not sufficient to warrant these improvements but instead serve to place a degree of additional strain on local health services / facilities or place new residents in areas with no local health facilities.
To reduce crime and the fear of crime	~	~	~	All new development should follow ‘secured by design’ principles and minimise future fear of crime issues.
To reduce deprivation and social exclusion	?	?	?	The opportunity exists for new development to address deprivation and social exclusion through regeneration of an area or the provision of much needed facilities for example.
To raise educational achievement levels and develop the opportunities for lifelong learning	?	?	?	Similar argument to that constructed under the health objective – it is unclear how the provision of new or upgraded educational facilities as a result of development would be distributed and what residual strains will result.
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	(✓)	(✓)	(✓)	It could be argued that reinforcing the existing population pattern across the rural area would maintain economic growth in the rural economy.
To improve accessibility to services and facilities for all ages across the District	(X)	(X)	(X)	Population does not necessarily correspond to either accessibility, provision of services or local needs therefore to distribute new growth based upon population would not necessarily serve to improve accessibility and is perhaps more likely to reduce it by a resultant greater amount of people in areas which lack good service provision.

To encourage and facilitate increased engagement in cultural and leisure activities	(X)	(X)	(X)	A similar argument applies here that distribution by population size will not necessarily facilitate increased engagement in leisure and cultural activities and could actually hinder it.
To improve efficiency in land use and encourage the prudent use of natural resources	?	?	?	Unclear at this stage the options ability to reuse land and buildings – this will be better assessed at Site Allocations.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(X)	(X)	(X)	Potential for increased car use as population sizes of settlements do not reflect service provision or accessibility.
To reduce emissions of Greenhouse gases	(X)	(X)	(X)	Potential for increased car usage.
To minimise the risk of flooding and resulting detriment to people and property	?	?	?	This will be assessed at Site Allocations.
To maintain, improve and manage water resources in a sustainable way	?	?	?	All new development should be built with water efficiency in mind. Unclear at this stage whether there will be any issue with water supply or treatment.
To conserve and enhance biodiversity	?	?	?	This will be assessed at Site Allocations.
To protect and enhance the high quality natural and built environment	(✓)	(✓)	(✓)	The option protects and reinforces the historic settlement pattern which characterises the High Weald AONB.
To reduce waste generation and disposal, and achieve the sustainable management of waste	(X)	(X)	(X)	This option has potential to have adverse effects for reducing waste generation as there is a likelihood that new facilities which will generate waste in construction and operation will need to be built where populations exceed service provision and new development exacerbates this.
Conformity with other policy/initiatives: High Weald AONB Unit & English Heritage representations;				
Non-conformity: PPS7 Development in Rural Areas				
Summary: the option has a greater potential for adverse effects than options 1-3 due to its underlying principle of dividing growth on the basis of population with no regard to service provision, community needs or accessibility. The option may be problematic in the context of current Local Plan policy regarding development boundaries. Only a selected group of larger villages have development boundaries and other policy does not allow for extensive development in other villages. Therefore the application of this option would require a major change of policy direction on this issue in the LDF.				

Strategy Options Rural Areas				
REJECTED AT OUTSET - DOES NOT CONFORM TO NATIONAL POLICY: Option 4b: Dispersed Development including Historic Farmsteads (main areas of change: spread even more widely incorporating tiny hamlets and even smaller farmsteads; strategy emphasis: manageable growth targeted to specific housing needs at a greater number of settlements)				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	~	~	~	The scale of overall growth for the rural villages has been set at the higher level of the options hierarchy and does not change between options. Therefore the overall provision of housing here will be the same. The ability to provide affordable dwellings does not change between options as there are different approaches that can be taken to ensure provision, small rural exception sites could deliver 100% affordable, as well as larger sites providing say 40% affordable.
To improve the health and well-being of the population and reduce inequalities in health	?	?	?	Unclear how this option would address the health and well-being of the rural population. Whilst there could clearly be some benefits to villages where the level of development leads to improvements in health facilities – or health facilities where there were none; there may also be a number of settlements where growth levels are not sufficient to warrant these improvements but instead serve to place a degree of additional strain on local health services / facilities or place new residents in areas with no local health facilities.
To reduce crime and the fear of crime	~	~	~	All new development should follow 'secured by design' principles and minimise future fear of crime issues.

To reduce deprivation and social exclusion	?	?	?	The opportunity exists for new development to address deprivation and social exclusion through regeneration of an area or the provision of much needed facilities for example.
To raise educational achievement levels and develop the opportunities for lifelong learning	?	?	?	Similar argument to that constructed under the health objective – it is unclear how the provision of new or upgraded educational facilities as a result of development would be distributed and what residual strains will result.
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	(✓)	(✓)	(✓)	It could be argued that reinforcing the existing population pattern across the rural area would maintain economic growth in the rural economy. It is recognised in the High Weald AONB Management Plan that there is a need for increased connection between settlements and that part of the economy based on the local countryside and development affordable housing tied to environmental employment at farmsteads could offer part of the solution.
To improve accessibility to services and facilities for all ages across the District	(X)	(X)	(X)	Wider dispersal of development would not necessarily correspond to either accessibility, provision of services or local needs, therefore to distribute new growth based upon general wide dispersal would not necessarily serve to improve accessibility and is perhaps more likely to reduce it by a resultant greater amount of people in areas which lack good service provision.
To encourage and facilitate increased engagement in cultural and leisure activities	(X)	(X)	(X)	A similar argument applies here that this distribution will not necessarily facilitate increased engagement in leisure and cultural activities and could actually hinder it.
To improve efficiency in land use and encourage the prudent use of natural resources	(X)	(X)	(X)	New development will effectively be on greenfield land.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(X)	(X)	(X)	High potential for increased car use as distribution does not reflect service provision or accessibility.

To reduce emissions of Greenhouse gases	(X)	(X)	(X)	Potential for increased car usage.
To minimise the risk of flooding and resulting detriment to people and property	?	?	?	This will be assessed at Site Allocations.
To maintain, improve and manage water resources in a sustainable way	?	?	?	All new development should be built with water efficiency in mind. Unclear at this stage whether there will be any issue with water supply or treatment.
To conserve and enhance biodiversity	?	?	?	This will be assessed at Site Allocations.
To protect and enhance the high quality natural and built environment	X	X	X	The option undermines the form and integrity of the area's historic farmsteads and the historic settlement pattern which characterises the High Weald AONB.
To reduce waste generation and disposal, and achieve the sustainable management of waste	(X)	(X)	(X)	This option has potential to have adverse effects for reducing waste generation as there is a likelihood that new facilities which will generate waste in construction and operation will need to be built where populations exceed service provision and new development exacerbates this.
Conformity with other policy/initiatives: High Weald AONB Unit				
Non-conformity: PPS7 Development in Rural Areas				
Summary: Option 4b has similar effects to option 4a as would be expected given the underlying approach based upon a wide dispersal. In considering this approach to development in the countryside, there is a need to balance the aspirational nature of the High Weald AONB Unit's proposal to benefit the management of the environment, with the physical impact of such a proposal on the landscape character and integrity of the District's historic farmstead patterns.				

Strategy Options Rural Areas

Option 5 Focus Development on Transport Corridors (main areas of change: A21 and A259 transport corridors and the north/south and east/west railway corridors; strategy emphasis: economic development led – strengthening Rother’s role within the wider South East England context. Emphasis on connectivity to London and Europe)				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	~	~	~	The scale of overall growth for the rural villages has been set at the higher level of the options hierarchy and does not change between options. Therefore the overall provision of housing here will be the same. The ability to provide affordable dwellings does not change between options as there are different approaches that can be taken to ensure provision, small rural exception sites could deliver 100% affordable, as well as larger sites providing say 40% affordable.
To improve the health and well-being of the population and reduce inequalities in health	?	?	?	This option seeks to locate growth irrespective of community need and service provision and may therefore not be addressing the requirements of existing and new residents in respect of improving health and well-being.
To reduce crime and the fear of crime	~	~	~	All new development should follow ‘secured by design’ principles and minimise future fear of crime issues.
To reduce deprivation and social exclusion	?	?	?	The opportunity exists for new development to address deprivation and social exclusion through regeneration of an area or the provision of much needed facilities for example.
To raise educational achievement levels and develop the opportunities for lifelong learning	?	?	?	It is unclear how the provision of new or upgraded educational facilities as a result of development would be distributed and what residual strains will result.
To sustain economic growth and competitiveness and encourage innovation	✓	✓	✓	Potential for beneficial effects for the economy by focusing growth where people and businesses have good access to

in higher value, lower impact activities				transport systems and links to the wider region and Europe via Ashford, Folkestone and Dover. Concentrating development along the best transport links in the District should help to reinforce Rother's role in the region and support rail services and general connectivity, which is fundamental to a thriving economy.
To improve accessibility to services and facilities for all ages across the District	~	~	~	Whilst the option may strengthen connectivity across the District it may not necessarily improve accessibility to local services and facilities used by residents on a day-to-day basis. Furthermore it may result that there is less incentive to provide jobs and services locally if development is situated near to good transport links, particularly if there are good public transport links.
To encourage and facilitate increased engagement in cultural and leisure activities	~	~	~	The effects may be judged as neutral insofar as any gains in accessibility to our major trunk roads and rail services which link our cultural and leisure facilities may be offset by the location of new development requiring residents to travel to reach them.
To improve efficiency in land use and encourage the prudent use of natural resources	(X)	(X)	(X)	Potential for negative effects as development is not guided to existing settlements where there are often more opportunities to improve efficiency in land use.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(X)	(X)	(X)	The option could encourage car use by locating along the main trunk road corridors. Furthermore growth along the trunk roads will include opportunities for businesses that may add traffic to these routes.
To reduce emissions of Greenhouse gases	(X)	(X)	(X)	The option is likely to lead to increased traffic movements on the trunk roads which would have an adverse effect on reducing greenhouse gas emissions.
To minimise the risk of flooding and resulting detriment to people and property	?	?	?	This will be assessed at Site Allocations.
To maintain, improve and manage water resources in a sustainable way	?	?	?	All new development should be built with water efficiency in mind. Unclear at this stage whether there will be any issue

				with water supply or treatment.
To conserve and enhance biodiversity	?	?	?	This will be assessed at Site Allocations.
To protect and enhance the high quality natural and built environment	(X)	(X)	(X)	The option is not reinforcing historic patterns of settlement or taking the opportunity to enhance existing settlements, as they are not the focus for growth. It does not aim to enhance the high quality natural environment and may be detrimental to village identity.
To reduce waste generation and disposal, and achieve the sustainable management of waste	?	?	?	Unclear at this stage what the effects on reducing waste generation will be. There may be requirements for additional services and facilities to be built alongside new development and these would generate waste in construction and operation. Conversely there may be opportunities to use the transport systems in place to link new residents to existing services and facilities.
Conformity with other policy/initiatives:				
Non-conformity:				
Summary: The effects of this option would become clearer when locations for development along the transport routes were known. There is the potential with this option for it to encourage car use and a general increase in travelling by road, which would result in adverse effects against the objectives to reduce car usage and greenhouse gas emissions. There would be a need to ensure that village and settlement identities were not adversely affected.				

Countryside

Option 1: Continue to limit development in the countryside, with the aim of balancing the tension between the protection of the countryside for its own sake while having regard to the pressures and potentials for development		
Sustainability Appraisal Objectives	Assessment	Comments / Proposed Mitigation

	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	(X)	(X)	(X)	Local housing needs may be compromised as the option seeks to protect countryside over and above providing affordable housing where needed.
To improve the health and well-being of the population and reduce inequalities in health	~	~	~	Whilst the option seeks to protect the countryside which has value for people in terms of facilitating healthy lifestyles – the option neglects to consider the real need of rural residents for affordable homes suitable to their needs. There are clear and understood links between the opportunity to live in a decent and affordable home and improving health and well-being.
To reduce crime and the fear of crime	~	~	~	
To reduce deprivation and social exclusion	(X)	(X)	(X)	There are pockets of relative deprivation in the countryside, including Camber, Iden, Winchelsea Beach and Catsfield for example. These particular areas score particularly poorly against the indicator barriers to housing; therefore continuation of the current policy approach could exacerbate this situation.
To raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	(X)	(X)	(X)	Schemes which would benefit the economy of the countryside may be overlooked with this tight control in place. This option may not encourage innovation or sustain economic growth and competitiveness.
To improve accessibility to services and facilities for all ages across the District	(✓)	(✓)	(✓)	By limiting development in the countryside the option restricts development in areas less well served by transport infrastructure and other services and facilities and could be considered therefore to improve accessibility overall. It could be argued that the provision of development in villages and hamlets within the countryside can help to provide much needed services and facilities and therefore improve

				accessibility locally, but this is not considered to outweigh the former point.
To encourage and facilitate increased engagement in cultural and leisure activities	~	~	~	Larger scale leisure opportunities in larger settlements and conversely sense of community may be strong in small hamlets.
To improve efficiency in land use and encourage the prudent use of natural resources	✓	✓	✓	The option aims to safeguard the natural resource of the countryside from inappropriate development and could be argued therefore to encourage the prudent use of natural resources.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(✓)	(✓)	?	Restricting new growth in the countryside should assist in maintaining the air quality in rural areas. In terms of improving travel choice and reducing car usage the option seeks to protect those areas less well served by transport infrastructure and so could be argued that it aims to reduce car use and improve travel choice by steering development to areas with better existing transport infrastructure and where improvements to such infrastructure is more appropriate in environmental terms. Question in the long term whether option would lead to increased congestion round the larger towns and villages?
To reduce emissions of Greenhouse gases	~	~	~	
To minimise the risk of flooding and resulting detriment to people and property	?	?	?	Much of the countryside in the District lies outside the floodplain and as such could be a more suitable place to build in flood risk terms, however there are areas of countryside where flooding is an issue and these should be avoided. Building on greenfield sites in the countryside would ultimately increase the area of hard surface and potentially increase surface run-off issues in the District. Mitigate by use of SuDS and allow development to be guided by the SFRA and sequential and exception tests.
To maintain, improve and manage water resources in a sustainable way	~	~	~	

To conserve and enhance biodiversity	✓	✓	✓	By strictly controlling new building development in the open countryside, wildlife habitats and tranquil areas will continue to be protected for the benefit of all.
To protect and enhance the high quality natural and built environment	✓	✓	?	A significant part of the District is designated within the High Weald Area of Outstanding Natural Beauty, the primary purpose of which is to conserve and enhance the natural beauty of the landscape. By strictly controlling new building development in the open countryside the landscape character will continue to be protected for the benefit of all. Question over the long term implications and whether there would be undue pressure on the towns and villages for development that may jeopardise the character of the built environment?
To reduce waste generation and disposal, and achieve the sustainable management of waste	~	~	~	
Conformity with other policy/initiatives: PPS1 Creating Sustainable Communities; PPS7 Sustainable Development in Rural Areas; PPS3 Housing;				
Non-conformity:				
Summary: The option may be considered to unduly stifle housing delivery in areas of need for affordable housing in the countryside and consequently not contribute to reducing inequality and deprivation where evidence shows this is due to a lack of access to affordable, decent homes. An issue which may further compound the relative pockets of deprivation in the countryside, is the limiting ability of the option to address rural economic concerns where schemes which would benefit the economy of the countryside may be overlooked. Positive effects may be expected in relation to the SA Objectives to ensure the prudent use of natural resources, to conserve and enhance biodiversity and to protect and enhance the high quality natural environment. Uncertainty over the longer terms effects for road congestion issues and the quality of the built environment for the District as a whole.				

Option 2: Supporting more extensive development in the countryside to stimulate and support farming economies, and maximise economic, tourist and recreational potential

Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	?	?	?	Option doesn't explicitly identify the position on housing development in the countryside.
To improve the health and well-being of the population and reduce inequalities in health	?	?	?	Unclear how the option would improve the health and well-being of the population. Clearly greater employment opportunities in rural areas for local people could have beneficial effects for those peoples health, however option doesn't caveat those jobs in tourism and recreation, for example, would be filled by local/rural residents.
To reduce crime and the fear of crime	~	~	~	
To reduce deprivation and social exclusion	?	?	?	Whilst the option clearly aims to stimulate the rural economy and therefore could be said to contribute to reducing deprivation in rural areas, the option does not indicate whether affordable housing in such areas would be allowed and from the evidence it is the barriers to housing indicator that these areas of deprivation score worst in.
To raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	It could be argued that improving the economic opportunities of rural areas could provide more incentive for young people to achieve higher levels of educational attainment.
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	✓	✓	✓	Option is clearly directed at stimulating and supporting the rural economies through maximising farming, recreation and tourism potential.
To improve accessibility to services and	?	?	?	Greater access to employment should be realised through this

facilities for all ages across the District				option, but it is unclear how accessibility to housing, and other services and facilities will be improved.
To encourage and facilitate increased engagement in cultural and leisure activities	✓	✓	✓	Option seeks to encourage an increase in recreational and leisure facilities in the countryside. Some tourism opportunities that might be realised through this option may also be cultural opportunities which would encourage increased engagement in cultural activities.
To improve efficiency in land use and encourage the prudent use of natural resources	?	?	?	Allowing intensified development to support farming economies could be argued to improve efficiency in land use given the current world position in relation to food production and rising prices. However it may not be such an efficient use of land or the prudent use of resources if, for example, a major new tourist attraction unrelated to the existing countryside were proposed.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(X)	(X)	(X)	The likelihood of increased traffic movements from the intensification of farming economies is likely to produce negative effects for this objective. New recreational and tourist activities are also likely to generate increased traffic movements in the countryside. Mitigation should consider ways to ensure green tourism and travel choice.
To reduce emissions of Greenhouse gases	(X)	(X)	(X)	Likely to be an increase in greenhouse gas emissions from the intensification of farming economies, the building of new tourism facilities and traffic movements associated with such development.
To minimise the risk of flooding and resulting detriment to people and property	~	~	~	Development would be guided by the SFRA and sequential and exception tests and no new development should increase the risk of flooding elsewhere.
To maintain, improve and manage water resources in a sustainable way	?	?	?	Farming can be very water-intensive and there is a clear need to ensure water is managed sustainably.
To conserve and enhance biodiversity	(X)	(X)	(X)	Biodiversity can be adversely (and beneficially affected) by farming techniques and operations. Need to ensure consideration is given to biodiversity and opportunities to

				maintain and enhance biodiversity are taken where possible – particularly in relation to new tourist and recreational opportunities.
To protect and enhance the high quality natural and built environment	(X)	(X)	(X)	It is generally accepted that maintaining existing land uses and patterns of development will protect the high quality landscape – this option would clearly allow some changes that could be considered detrimental to the character of countryside. Furthermore increased traffic movements would adversely affect the high quality natural and built environment.
To reduce waste generation and disposal, and achieve the sustainable management of waste	(X)	(X)	(X)	Intensification of farming economies and the creation of new tourist attractions would likely increase waste generation. Need to ensure sustainable waste management.
Conformity with other policy/initiatives: PPG21 Tourism; PPS7 Sustainable Development in Rural Areas – in relation to sustainable economic growth and diversification				
Non-conformity: elements of PPS7 that relate to a high level of protection for the most valued environments – in this instance the AONB				
Summary: A great deal of uncertainty largely due to the fact that the option does not indicate the position for housing development with this option – is it purely development for economic purposes or will this be balanced with affordable housing provision where required? Beneficial effects for the SA Objectives concerning the economy, culture and leisure; adverse effects for the SA Objectives relating to the protection of the high quality natural environment, reducing road congestion and improving air quality, and reducing waste generation.				

Option 3: To override countryside policies of development restraint, by the intensification and extension of isolated farmsteads to provide dwellings for those involved in land based economic activity		
Sustainability Appraisal Objectives	Assessment	Comments / Proposed Mitigation

	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	✓	✓	✓	Option seeks to redress the housing shortage in rural areas, particularly for those people engaged in land-based economic activity in the District.
To improve the health and well-being of the population and reduce inequalities in health	(✓)	(✓)	(✓)	Clear and understood links between housing provision where it is needed and health and well-being.
To reduce crime and the fear of crime	~	~	~	
To reduce deprivation and social exclusion	✓	✓	✓	The pockets of deprivation in the rural areas particularly concerns the lack of affordable, decent housing – this option should help to reduce deprivation by meeting the rural housing needs through the intensification of existing farmsteads to provide dwellings. Need to ensure that dwellings provided are for recognised local needs and not attracting potentially high-earning commuters from outside the District that wish to reside in a rural location.
To raise educational achievement levels and develop the opportunities for lifelong learning	(✓)	(✓)	(✓)	The provision of new affordable housing within historic farmsteads may help to meet the skills gap of those engaged in land-based economic activity and raise aspirational educational attainment. Also potential for use of farmsteads for land based enterprise which could aid education aspirations.
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	(✓)	(✓)	(✓)	Potential for use of farmsteads for land based enterprise and to incorporate renewable energy projects such as wood-fuel and such diversification can help to support and sustain economic growth in the rural areas. The reinstatement of farm complexes should produce positive effects for the rural economy.
To improve accessibility to services and facilities for all ages across the District	?	?	?	Accessibility for land-based workers could be improved through the provision of dwellings close to places of

				employment and neighbouring settlements with service and facility provisions. However the implications on a District-wide scale could be adverse as increasing the spread of population would mean that in the main more people would be further from major services and facilities such as large food stores, public transport interchanges, banks etc.
To encourage and facilitate increased engagement in cultural and leisure activities	~	~	~	
To improve efficiency in land use and encourage the prudent use of natural resources	?	?	?	On the one hand the reinstatement of the historic farmstead could be seen as making efficient use of land and buildings that have previously been occupied in such a capacity. On the other hand – the likely requirement for a proportion of greenfield land for some of the farmstead developments could be considered as inefficient given the opportunities District-wide for brownfield land development.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(X)	(X)	(X)	Likelihood of intensification of traffic movements between farmsteads and their neighbouring settlements and places of work.
To reduce emissions of Greenhouse gases	~	~	~	Potential for an increase in greenhouse gas emissions as with all options proposing development, however this could be offset by the opportunities for renewable energy projects. Consider making renewable energy a requirement for the development of farmsteads.
To minimise the risk of flooding and resulting detriment to people and property	~	~	~	Development will be guided by the SFRA and sequential and exception test.
To maintain, improve and manage water resources in a sustainable way	~	~	~	SuDS and sustainable water management would be ensured through the cross-cutting policies.
To conserve and enhance biodiversity	(X)	(X)	(X)	Likelihood that where farmsteads have been unoccupied for any length of time their biodiversity interests will have increased as nature has begun to reclaim. Inevitably in

				developing the farmsteads biodiversity will be lost and particularly this could be an issue for any areas of greenfield land where biodiversity may be greatest.
To protect and enhance the high quality natural and built environment	(X)	(X)	(X)	Due to the option allowing the intensification and extension of isolated farmsteads, it is considered that there will be a detrimental impact on the historic settlement pattern of the countryside. The majority of which is designated as AONB because of the intrinsic value of this settlement pattern. Increases in traffic movements could also compound this issue. Mitigation should consider ways to incorporate biodiversity considerations into the redevelopment of farmsteads.
To reduce waste generation and disposal, and achieve the sustainable management of waste	(X)	(X)	(X)	The option is likely to increase waste generation in the District, due to the allowance for intensification and extension to farmsteads and possibility of new land-based enterprise that may have waste implications.
Conformity with other policy/initiatives:				
Non-conformity: possible conflict with PPS7; PPG13 Transport; PPS3 Housing				
Summary: The option should produce beneficial effects for the provision of decent affordable homes for all, health and well-being, reducing deprivation, raising educational attainment and perhaps to a lesser extent rural economic growth. There are concerns over the potential legal considerations in terms of the enforceability of occupancy conditions. Adverse effects may be expected for the SA Objectives concerning reducing traffic movements, conserving and enhancing biodiversity and the high quality natural and built environment and reducing waste generation.				

COMMUNITIES

Strategy Options: Affordable Housing - Percentage

Option 1: Continue with the percentages set out in Local Plan Policy HG1 (40% affordable on sites of 15 dwellings and above in Bexhill, Battle and Rye and on sites of 5 or more within the village development boundaries)

Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	(✓)	(✓)	(✓)	Option has been successful in increasing the delivery of affordable housing; however it does not recognise the differing extent of the affordability crisis between different parts of the District.
To improve the health and well-being of the population and reduce inequalities in health	(✓)	(✓)	(✓)	The option would have some beneficial effect on the health and well-being of the population where improvements in the provision of affordable housing have been delivered – however the option fails to recognise differing needs across the District and therefore would not deliver the maximum benefits in relation to this objective.
To reduce crime and the fear of crime	~	~	~	
To reduce deprivation and social exclusion	(X)	(X)	(X)	The option does not recognise the differing extent of the affordability crisis between different parts of the District and therefore could be argued to have adverse effects on reducing social exclusion and deprivation.
To raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	
To sustain economic growth and competitiveness and encourage innovation	(X)	(X)	(X)	The affordability crisis and differential across the District is potentially contributing to stifling the economic growth in the

in higher value, lower impact activities				District.
To improve accessibility to services and facilities for all ages across the District	(X)	(X)	(X)	The trend of the greatest number of affordable dwellings being built in the rural areas maybe reducing overall accessibility across the District to major services and facilities. (Although it could be argued that providing dwellings in rural villages is helping to support local services and therefore maintaining accessibility to some services and facilities in local areas)
To encourage and facilitate increased engagement in cultural and leisure activities	~	~	~	
To improve efficiency in land use and encourage the prudent use of natural resources	(X)	(X)	(X)	As the majority of new housing has been provided within the villages in the rural areas it could be argued that efficient use of land is not being maximised as appropriate previously developed sites in towns, arguable more sustainable, are taking longer to develop possibly due to higher requirements for affordable housing.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(X)	(X)	(X)	The distribution of development under this option has favoured the countryside locations and this does not support this objective in terms of reducing car usage and increasing travel choice.
To reduce emissions of Greenhouse gases	(X)	(X)	(X)	Pattern of distribution evident with this option is not beneficial in reducing greenhouse gas emissions due to likelihood of increased car usage due to rural location of new development.
To minimise the risk of flooding and resulting detriment to people and property	~	~	~	
To maintain, improve and manage water resources in a sustainable way	~	~	~	
To conserve and enhance biodiversity	?	?	?	Possibility that development in the rural villages may be compromising biodiversity more than the opportunities in the more urban centres?
To protect and enhance the high quality natural and built environment	?	?	?	Whilst development is occurring within development boundaries there is still a question over whether this is

				enhancing the built environment within villages and furthermore whether the relative lack of development in the more urban towns is stifling regeneration and built environment improvements?
To reduce waste generation and disposal, and achieve the sustainable management of waste	~	~	~	
Conformity with other policy/initiatives: South East Plan including Sussex Coast Sub-Region Chapter; Rother Local Plan 2006				
Non-conformity:				
Summary: Whilst the option has been successful in increasing the delivery of affordable housing, a flat 40% doesn't at present recognise the different requirements within different parts of the District, particularly between Bexhill and the rural area. This issue leads to the potential for adverse effects against the SA Objectives to reduce social exclusion, car usage and greenhouse gas emissions and would likely not improve accessibility or efficiency in land use.				

Strategy Options: Affordable Housing - Percentage				
Option 2: Option Two: Adjust the percentage requirements for affordable housing by means of a requirement for: <ul style="list-style-type: none"> • 50% in Rural Villages • 40% in Rye and Battle • 35% in Bexhill 				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	✓	✓	✓	Option should increase overall provision of affordable housing: a higher requirement of affordable housing in rural areas would not necessarily hamper the economics of development to the

				same extent as other areas as rural locations are highly sought after relative to other parts of the District. Option should help facilitate development in the District's largest urban service centre – Bexhill.
To improve the health and well-being of the population and reduce inequalities in health	✓	✓	✓	Improved provision where needed should help to improve the health and well-being of the population.
To reduce crime and the fear of crime	~	~	~	
To reduce deprivation and social exclusion	✓	✓	✓	Option is aimed at reducing the disparities of affordable housing delivery and should therefore contribute to reducing social exclusion and deprivation.
To raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	(✓)	(✓)	(✓)	Option should support this objective by increasing the supply of affordable (and market) housing in the larger urban areas where economic growth and regeneration are a focus and accessibility to employment is greatest. Furthermore option should not overly compromise the economics of house-building in rural areas due to the desirability of the location and willingness of those who can afford more to do so in order to achieve a rural living location.
To improve accessibility to services and facilities for all ages across the District	✓	✓	✓	Encouraging development of housing and particularly affordable housing in the larger urban centres should assist in improving accessibility for greater numbers of people to services and facilities.
To encourage and facilitate increased engagement in cultural and leisure activities	~	~	~	
To improve efficiency in land use and encourage the prudent use of natural resources	(✓)	(✓)	(✓)	Opportunities for regeneration and development on previously developed land should be maximised by this option – although there is clearly a potential for extensive greenfield development

				on the Bexhill fringes.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(✓)	(✓)	(✓)	Option should help to encourage the use of public transport and other sustainable modes as a preference to the car by the urban location of development.
To reduce emissions of Greenhouse gases	~	~	~	Option should better address this objective than option 1 as greater accessibility should help reduce car usage and consequent greenhouse gas emissions. However house-building, either affordable or market, will not reduce greenhouse gas emissions.
To minimise the risk of flooding and resulting detriment to people and property	~	~	~	
To maintain, improve and manage water resources in a sustainable way	~	~	~	
To conserve and enhance biodiversity	?	?	?	Potential for loss of biodiversity around Bexhill fringes, but otherwise greater urban building rates could help preserve biodiversity in other parts of the District.
To protect and enhance the high quality natural and built environment	(✓)	(✓)	(✓)	Opportunities for regeneration and urban enhancement should be maximised with this option.
To reduce waste generation and disposal, and achieve the sustainable management of waste	~	~	~	
Conformity with other policy/initiatives: South East Plan and Sussex Coast Sub-region Chapter				
Non-conformity:				
Summary: it can be surmised that a higher requirement of affordable housing in rural areas would not necessarily hamper the economics of development to the same extent as in other areas and lowering the requirement to 35% for Bexhill should help facilitate development in the District's largest urban service centre. The option should produce beneficial effects for SA Objectives considering housing, health, social exclusion, accessibility, economic growth, efficiency in land use, car use, and the built and natural environment. No adverse effects have been identified at this stage.				

Strategy Options: Affordable Housing – Threshold

Option 1: Continue with the thresholds set out in Local Plan Policy HG1, as supported by the Affordable Housing Supplementary Planning Document 2006

Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	(✓)	(✓)	(✓)	The adoption of the Affordable Housing SPD has resulted in increased delivery of affordable housing. However the problem of affordability is still intensely felt and could be addressed further.
To improve the health and well-being of the population and reduce inequalities in health	(✓)	(✓)	(✓)	Option addresses this Objective but could go further.
To reduce crime and the fear of crime	~	~	~	
To reduce deprivation and social exclusion	(X)	(X)	(X)	There is strong evidence of affordability problems and particularly high housing need in Rye and Battle; therefore an option that sets a threshold the same for Rye, Battle and Bexhill does not address social exclusion and deprivation issues as an option that differentiated could.
To raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	(X)	(X)	(X)	The affordability crisis and differential across the District is potentially contributing to stifling the economic growth in the District.
To improve accessibility to services and facilities for all ages across the District	(X)	(X)	(X)	It has been shown that more development has been occurring in rural areas since the adoption of the SPD which is unlikely to

				improve accessibility across the whole District.
To encourage and facilitate increased engagement in cultural and leisure activities	~	~	~	
To improve efficiency in land use and encourage the prudent use of natural resources	~	~	~	
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(X)	(X)	(X)	The distribution of development under this option has favoured the countryside locations and this does not support this objective in terms of reducing car usage and increasing travel choice.
To reduce emissions of Greenhouse gases	(X)	(X)	(X)	Pattern of distribution evident with this option is not beneficial in reducing greenhouse gas emissions due to likelihood of increased car usage due to rural location of new development.
To minimise the risk of flooding and resulting detriment to people and property	~	~	~	
To maintain, improve and manage water resources in a sustainable way	~	~	~	
To conserve and enhance biodiversity	?	?	?	Possibility that development in the rural villages may be compromising biodiversity more than the opportunities in the more urban centres?
To protect and enhance the high quality natural and built environment	?	?	?	Whilst development is occurring within development boundaries there is still a question over whether this is enhancing the built environment within villages and furthermore whether the relative lack of development in the more urban towns is stifling regeneration and built environment improvements?
To reduce waste generation and disposal, and achieve the sustainable management of waste	~	~	~	
Conformity with other policy/initiatives: Rother Local Plan 2006				
Non-conformity:				

Summary: As discussed, the adoption of the Affordable Housing SPD has resulted in increased delivery of affordable housing; however the problem of affordability is still intensely felt and could be addressed further. Potential for adverse effects similar to those experienced under Percentage Option 1 - potential for adverse effects against the SA Objectives to reduce social exclusion, car usage and greenhouse gas emissions and would be likely not to improve accessibility.

Strategy Options: Affordable Housing – Threshold				
Option 2a: lower the threshold in all urban areas from the current 15 to 10				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	(✓)	(✓)	(✓)	The Housing Needs Survey demonstrated particularly high need in Rye and Battle – which suggests a distinction should be made between the two market towns and Bexhill.
To improve the health and well-being of the population and reduce inequalities in health	(✓)	(✓)	(✓)	
To reduce crime and the fear of crime	~	~	~	
To reduce deprivation and social exclusion	(✓)	(✓)	(✓)	Addressing this objective through lowering the thresholds in the urban areas, should particularly benefit areas of need such as in Rye and Battle.
To raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	
To sustain economic growth and competitiveness and encourage innovation	?	?	?	Option could hamper the delivery of housing to support economic needs in Bexhill as current delivery in Bexhill is

in higher value, lower impact activities				relatively low compared to the rest of the District and this option would exacerbate the situation by requiring affordable units on smaller sized plots.
To improve accessibility to services and facilities for all ages across the District	~	~	~	In theory greater delivery of affordable (and market) housing in the urban areas should increase overall accessibility on a District-wide scale. Slight concern over whether housing development will be hampered in Bexhill by the lowering of the threshold and therefore other locations (potentially less sustainable/accessible) such as rural locations may be favoured?
To encourage and facilitate increased engagement in cultural and leisure activities	~	~	~	
To improve efficiency in land use and encourage the prudent use of natural resources	~	~	~	
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(X)	(X)	(X)	Lowering the threshold in urban areas could compound the existing trend of greater provision in rural areas which are less well-served by public transport and encourage car use.
To reduce emissions of Greenhouse gases	(X)	(X)	(X)	Correspondingly emissions of greenhouse gases may rise.
To minimise the risk of flooding and resulting detriment to people and property	~	~	~	
To maintain, improve and manage water resources in a sustainable way	~	~	~	
To conserve and enhance biodiversity	~	~	~	
To protect and enhance the high quality natural and built environment	~	~	~	
To reduce waste generation and disposal, and achieve the sustainable management of waste	~	~	~	

Conformity with other policy/initiatives:
Non-conformity:
Summary: The Housing needs Survey 2005 demonstrated particularly high housing need in Rye and Battle, which suggests that a distinction should be made between the two market towns and Bexhill. This option makes no such distinction. There is a significant element of uncertainty with this option surrounding the issue of development in Bexhill and whether this new, lower threshold would further still favour rural areas (and possibly the market towns) over Bexhill for development as more desirable locations?

Strategy Options: Affordable Housing – Threshold				
Option 2b: to lower the threshold in Rye and Battle to 10 but to maintain it at 15 in Bexhill				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	✓	✓	✓	Evidence suggests that a distinction should be made between thresholds in Rye and Battle with those of Bexhill due to confirmed housing needs.
To improve the health and well-being of the population and reduce inequalities in health	✓	✓	✓	Option is addressing housing need which should have a positive effect on the health and well-being of the population.
To reduce crime and the fear of crime	~	~	~	
To reduce deprivation and social exclusion	✓	✓	✓	Option is addressing housing need which should have a positive effect on reducing deprivation and social exclusion.
To raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	
To sustain economic growth and competitiveness and encourage innovation	(✓)	(✓)	(✓)	Option should support economic growth through encouraging greater housing provision in Bexhill – the major service town

in higher value, lower impact activities				and economic hub in the District through higher thresholds requirements and should assist economic growth in the market towns through the potential for greatest affordable housing provision in these areas of need consequently supporting the economies of the market towns.
To improve accessibility to services and facilities for all ages across the District	✓	✓	✓	The adjustments in the threshold requirements should assist in encouraging more affordable (and market) housing provision in Bexhill, arguably the most accessible town in the District with the greatest number of services, facilities and employment opportunities.
To encourage and facilitate increased engagement in cultural and leisure activities	~	~	~	
To improve efficiency in land use and encourage the prudent use of natural resources	~	~	~	
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	✓	✓	✓	The adjustments in the threshold requirements should assist in encouraging appropriate levels of housing provision in the towns of the District, therefore distributing a greater proportion to the towns than under current conditions which should place a greater proportion of the population in areas where services and facilities are accessible by sustainable modes of transport and should proportionally help to reduce car use.
To reduce emissions of Greenhouse gases	~	~	~	Accordingly the distribution patterns that may be expected with this option should help to contain rises in greenhouse emissions.
To minimise the risk of flooding and resulting detriment to people and property	~	~	~	
To maintain, improve and manage water resources in a sustainable way	~	~	~	
To conserve and enhance biodiversity	~	~	~	

To protect and enhance the high quality natural and built environment	~	~	~	
To reduce waste generation and disposal, and achieve the sustainable management of waste	~	~	~	
Conformity with other policy/initiatives: Housing Needs Survey 2005, the Housing Market Assessment. The South East Plan				
Non-conformity:				
<p>Summary: The Housing needs Survey 2005 demonstrated particularly high housing need in Rye and Battle, which suggests that a distinction should be made between the two market towns and Bexhill. Therefore, a lower threshold in the market towns vis-à-vis Bexhill may be justifiable since there is stronger evidence of affordability problems in these areas than in Bexhill. The option should also have indirect effects associated with potential increases in housing provision in towns rather than rural areas improving accessibility (and reducing the need for private car use) across the District, reducing social exclusion by more adequate provision of affordable housing where needed, supporting economic growth and possibly assisting in containing the increase in greenhouse gas emissions (though house-building naturally increases emissions).</p>				

Strategy Options: Affordable Housing – Threshold				
Option 3a: Lower the rural threshold from 5 to 3, and from 0.2ha to 0.12ha (based upon a 40% requirement and for comparison purposes with option 3b a 50% requirement)				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	✓	✓	✓	Option should result in an increase in rural affordable housing provision. The option would perform better in respect of this SA Objective than option 3b if the requirement was for 50%,

				however at the standard 40% the options would deliver roughly the same increase in provision.
To improve the health and well-being of the population and reduce inequalities in health	✓	✓	✓	Option is addressing housing need evident in rural areas which should have a positive effect on the health and well-being of the population.
To reduce crime and the fear of crime	~	~	~	
To reduce deprivation and social exclusion	✓	✓	✓	Option is addressing housing need evident in rural areas, which should have a positive effect on social exclusion relating to inequalities in the ability of District residents to afford to live or remain living in rural areas.
To raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	✓	✓	✓	Supporting rural and land-based economies through increased provision of affordable housing likely to be suitable for key rural workers.
To improve accessibility to services and facilities for all ages across the District	?	?	?	Increased affordable dwellings in the rural areas may improve accessibility for rural or land-based workers to their employment, but other aspects of accessibility to services and facilities may be compromised. Option may have the effect of discouraging the development of some of the smaller windfall sites in rural areas which may have the effect of proportionally increasing the provision in urban areas which could be considered to improve accessibility.
To encourage and facilitate increased engagement in cultural and leisure activities	~	~	~	
To improve efficiency in land use and encourage the prudent use of natural resources	~	~	~	It could be argued that providing affordable dwellings on even smaller sites than currently would be improving the efficiency in land use.
To reduce road congestion and pollution levels and ensure air quality continues to	~	~	~	

improve by increasing travel choice and reducing car usage				
To reduce emissions of Greenhouse gases	~	~	~	
To minimise the risk of flooding and resulting detriment to people and property	~	~	~	
To maintain, improve and manage water resources in a sustainable way	~	~	~	
To conserve and enhance biodiversity	~	~	~	
To protect and enhance the high quality natural and built environment	~	~	~	
To reduce waste generation and disposal, and achieve the sustainable management of waste	~	~	~	
Conformity with other policy/initiatives:				
Non-conformity:				
<p>Summary: if the threshold were 50% option 3a would result in the delivery of more affordable housing than option 3b. For example if the threshold were 50%, under option 3a a four dwelling development would comprise two affordable dwellings, however under option 3b the same four dwelling development would only require one affordable unit. Assessment against the SA Objectives shows positive effects for housing, health and well-being, reducing social exclusion and supporting rural economies. No adverse impacts have been identified but there is some uncertainty over the effects on accessibility.</p>				

Strategy Options: Affordable Housing – Threshold

Option 3b: Maintain the rural threshold of 5, but require all developments of 3 and 4 dwellings to provide one affordable dwelling (based upon a 40% requirement and for comparison purposes with option 3b a 50% requirement)

Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	(✓)	(✓)	(✓)	Option should result in an increase in rural affordable housing provision. The option would perform worse in respect of this SA Objective than option 3a if the requirement was for 50%, however at the standard 40% the options would deliver roughly the same increase in provision.
To improve the health and well-being of the population and reduce inequalities in health	✓	✓	✓	Option is addressing housing need evident in rural areas which should have a positive effect on the health and well-being of the population.
To reduce crime and the fear of crime	~	~	~	
To reduce deprivation and social exclusion	✓	✓	✓	Option is addressing housing need evident in rural areas, which should have a positive effect on social exclusion relating to inequalities in the ability of District residents to afford to live or remain living in rural areas.
To raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	✓	✓	✓	Supporting rural and land-based economies through increased provision of affordable housing likely to be suitable for key rural workers.
To improve accessibility to services and facilities for all ages across the District	?	?	?	Increased affordable dwellings in the rural areas may improve accessibility for rural or land-based workers to their

				employment, but other aspects of accessibility to services and facilities may be compromised. Option may have the effect of discouraging the development of some of the smaller windfall sites in rural areas which may have the effect of proportionally increasing the provision in urban areas which could be considered to improve accessibility.
To encourage and facilitate increased engagement in cultural and leisure activities	~	~	~	
To improve efficiency in land use and encourage the prudent use of natural resources	~	~	~	It could be argued that providing affordable dwellings on even smaller sites than currently would be improving the efficiency in land use.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	~	~	
To reduce emissions of Greenhouse gases	~	~	~	
To minimise the risk of flooding and resulting detriment to people and property	~	~	~	
To maintain, improve and manage water resources in a sustainable way	~	~	~	
To conserve and enhance biodiversity	~	~	~	
To protect and enhance the high quality natural and built environment	~	~	~	
To reduce waste generation and disposal, and achieve the sustainable management of waste	~	~	~	
Conformity with other policy/initiatives:				
Non-conformity:				

Summary: if the threshold were 50% option 3a would result in the delivery of more affordable housing than this option 3b. For example if the threshold were 50%, under option 3a a four dwelling development would comprise two affordable dwellings, however under option 3b the same four dwelling development would only require one affordable unit. Assessment against the SA Objectives shows similar results to Option 3a.

Strategy Options: Affordable Housing – Type

Option One: Apply a minimum of 25% social housing and 10% intermediate on all sites.

Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	(✓)	(✓)	(✓)	Option is aiming to implement the South East Plan stipulation of mix which is designed to better address the affordable housing needs in the south east. However local evidence suggests that the needs in rural and urban areas differs enough that apply 'blanket' proportions would not adequately address the local needs.
To improve the health and well-being of the population and reduce inequalities in health	(✓)	(✓)	(✓)	
To reduce crime and the fear of crime	~	~	~	
To reduce deprivation and social exclusion	(✓)	(✓)	(✓)	Option goes some way to addressing deprivation but could be locally tailored to ensure housing type is appropriate to need in specific areas.
To raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	

To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	~	~	
To improve accessibility to services and facilities for all ages across the District	(✓)	(✓)	(✓)	Improving access to suitable housing – option could go further by tailoring the requirements to ensure differences in rural/urban local need are addressed.
To encourage and facilitate increased engagement in cultural and leisure activities	~	~	~	
To improve efficiency in land use and encourage the prudent use of natural resources	~	~	~	
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	~	~	
To reduce emissions of Greenhouse gases	~	~	~	
To minimise the risk of flooding and resulting detriment to people and property	~	~	~	
To maintain, improve and manage water resources in a sustainable way	~	~	~	
To conserve and enhance biodiversity	~	~	~	
To protect and enhance the high quality natural and built environment	~	~	~	
To reduce waste generation and disposal, and achieve the sustainable management of waste	~	~	~	
Conformity with other policy/initiatives: The South East Plan				
Non-conformity: Rother and Hastings Housing Market Assessment 2006				

Summary: This option would rigidly and inflexibly apply the Draft South East Plan stipulation that the mix should include at least 25% social-rented and at least 10% intermediate. This option would apply blanket proportions to urban and rural areas which evidence shows have different needs.

Strategy Options: Affordable Housing – Type

Option Two (Preferred): Stipulate Separate Proportions between Bexhill and Rest of the District, as follows

- **Bexhill Option:** Social rented would comprise 20-25% of the mix on Bexhill major development sites, with the balance (15-20%) comprising intermediate housing.
- **Rural Option:** A proposed mix of 10%-20% intermediate, 20%-30% social rented in rural areas.

Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	✓	✓	✓	Option is recognising the need to stipulate the type of affordable housing to be provided and is using the local evidence to adjust the apportionment.
To improve the health and well-being of the population and reduce inequalities in health	✓	✓	✓	There should consequently be greater health and well-being benefits from providing appropriate types of affordable housing.
To reduce crime and the fear of crime	~	~	~	
To reduce deprivation and social exclusion	✓	✓	✓	The locally tailored stipulation for affordable housing type is more appropriate to the identified need in rural and urban areas of the District and would therefore better address the deprivation and barriers to housing issues in these areas.
To raise educational achievement levels	~	~	~	

and develop the opportunities for lifelong learning				
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	~	~	
To improve accessibility to services and facilities for all ages across the District	✓	✓	✓	Improving access to suitable housing
To encourage and facilitate increased engagement in cultural and leisure activities	~	~	~	
To improve efficiency in land use and encourage the prudent use of natural resources	~	~	~	
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	~	~	
To reduce emissions of Greenhouse gases	~	~	~	
To minimise the risk of flooding and resulting detriment to people and property	~	~	~	
To maintain, improve and manage water resources in a sustainable way	~	~	~	
To conserve and enhance biodiversity	~	~	~	
To protect and enhance the high quality natural and built environment	~	~	~	
To reduce waste generation and disposal, and achieve the sustainable management of waste	~	~	~	
Conformity with other policy/initiatives: Rother and Hastings Housing Market Assessment 2006				
Non-conformity: South East Plan				

Summary: In the Hastings & Rother Housing Market Assessment, DTZ recommended that social rented should comprise no more than 25% due to concerns about the impact of provision of up to 40% social rented would have on the social mix and dynamics of the Bexhill Community. Although the South East Plan suggested that the mix should comprise at least 25% social rented (see option one), a lower level of 20% on some Bexhill sites would be balanced by a higher level on some rural sites. Evidence shows that on sites in rural Rother, Rye and Battle the balance should be tilted slightly more towards social housing, due in part to the stock of social rented dwindling over time as a consequence of the 'right to buy'.

An important caveat to both the above options is that in all circumstances, the Housing Service will advise on the types of affordable housing that are appropriate on individual sites at particular time. If appropriate, the proportions on particular sites may vary from the set standard.

Strategy Options: Affordable Housing – Allocations

Option 1: Retain principle of exception sites in line with current local plan policy

Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	(✓)	(✓)	(✓)	Although in practice the policy has yet to result in additional affordable housing it has not had much time to produce results since Local plan adoption in 2006. The policy remains a positive step to address the issue of affordable housing shortage and should be retained.
To improve the health and well-being of the population and reduce inequalities in health	(✓)	(✓)	(✓)	Whilst significant development has not taken place under this policy the option is still addressing health and well-being albeit potentially on a more localised than District-wide level.
To reduce crime and the fear of crime	~	~	~	

To reduce deprivation and social exclusion	(✓)	(✓)	(✓)	Whilst significant development has not taken place under this policy the option is addressing social exclusion by facilitating people in rural housing need.
To raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	(✓)	(✓)	(✓)	Option contributing to sustaining rural economies.
To improve accessibility to services and facilities for all ages across the District	~	~	~	Some future improvements may be seen in accessibility for key rural workers and those in land based employment in rural areas. May not be considered to be improving District-wide accessibility as not directing development to the 'more sustainable' urban locations
To encourage and facilitate increased engagement in cultural and leisure activities	~	~	~	
To improve efficiency in land use and encourage the prudent use of natural resources	?	?	?	Sites have not come forward under this policy but potential exists in the future for greenfield sites to be developed for affordable housing. It could be argued that due to the policy requiring 100% affordable housing this would be a more efficient use of land (addressing housing need) than if there were to be a proportion of market housing.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	~	~	Sites have not come forward under this policy so difficult to assess the likely future rate of development under this option. The option has potential for increasing car use due to the rural nature of locations that could come forward under this option.
To reduce emissions of Greenhouse gases	~	~	~	
To minimise the risk of flooding and resulting detriment to people and property	~	~	~	Development must avoid areas at significant risk from flooding and implement SuDS where practicable.
To maintain, improve and manage water resources in a sustainable way	~	~	~	

To conserve and enhance biodiversity	?	?	?	Due to the nature of locations likely to come forward under this option there could be a loss of biodiversity.
To protect and enhance the high quality natural and built environment	?	?	?	Depends upon the location, design and implementation of this option – other policy will guide requirements in this respect.
To reduce waste generation and disposal, and achieve the sustainable management of waste	~	~	~	
Conformity with other policy/initiatives: Rother Local Plan 2006				
Non-conformity:				
Summary: Although in practice the policy has yet to result in additional affordable housing it has not had much time to produce results since Local plan adoption in 2006. The policy remains a positive step to address the issue of affordable housing shortage and should be retained. Other policy pertaining to design, biodiversity and sustainable building will be useful in mitigating this option.				

Strategy Options: Affordable Housing – Allocations				
Option 2: Allocate small sites (less than 10 dwellings) wholly or substantially for affordable housing in areas of need				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	(✓)	(✓)	(✓)	PPS3 Housing states that authorities can allocate sites in market towns and larger villages solely for affordable housing. The Hastings & Rother Housing Market Assessment suggests 'This could be a very useful tool for Rother DC to use in encouraging provision of additional affordable housing in its rural area.
To improve the health and well-being of	(✓)	(✓)	(✓)	

the population and reduce inequalities in health				
To reduce crime and the fear of crime	~	~	~	
To reduce deprivation and social exclusion	(✓)	(✓)	(✓)	Option seeks to identify rural sites in areas of recognised housing need – therefore addressing deprivation in relation to housing issues.
To raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	(✓)	(✓)	(✓)	Option contributing to sustaining rural economies.
To improve accessibility to services and facilities for all ages across the District	~	~	~	Some future improvements may be seen in accessibility for key rural workers and those in land based employment in rural areas. May not be considered to be improving District-wide accessibility as not directing development to the 'more sustainable' urban locations.
To encourage and facilitate increased engagement in cultural and leisure activities	~	~	~	
To improve efficiency in land use and encourage the prudent use of natural resources	?	?	?	This may depend upon the locations chosen, but it could be argued that providing 100% affordable housing on sites where there is an identified housing need could be improving the efficiency in land use.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	?	?	?	This may depend upon the locations allocated, the option aims to promote locations that are within or adjacent to settlement boundaries but it is not clear whether this would only apply to settlements with an existing range of services or to any where housing need had been identified. Option could lead to an increase in car use due to the rural locations of new development in relation to the District's services and facilities.

To reduce emissions of Greenhouse gases	?	?	?	An increase in car use would be likely to lead to an increase in greenhouse gas emissions, but as locations are unidentified at present it is unclear what the levels of increase may be.
To minimise the risk of flooding and resulting detriment to people and property	~	~	~	The allocations would be made avoiding areas of significant flood risk.
To maintain, improve and manage water resources in a sustainable way	~	~	~	
To conserve and enhance biodiversity	?	?	?	Depends upon locations identified.
To protect and enhance the high quality natural and built environment	?	?	?	Depends upon the location, design and implementation of this option – other policy will guide requirements in this respect.
To reduce waste generation and disposal, and achieve the sustainable management of waste	~	~	~	
Conformity with other policy/initiatives: PPS 3 Housing				
Non-conformity:				
Summary: allocations that are wholly or substantially for affordable housing on smaller sites could supplement the provision of affordable housing in settlements of particular need.				

Housing Mix

Strategy Options: Housing Mix				
Option 1: Retain Local Plan policy of 30% requirement of 1&2 bed properties as stands				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	(X)	(X)	(X)	Evidence shows that a higher proportion of one and two bed properties than the current local plan requirement of 30% are needed, particularly in rural areas.
To improve the health and well-being of the population and reduce inequalities in health	~	~	~	
To reduce crime and the fear of crime	~	~	~	
To reduce deprivation and social exclusion	~	~	~	Option may not be addressing the needs of some smaller family units or single and young people.
To raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	(X)	(X)	(X)	There is a much greater stock of smaller and rented property in urban areas than the rural areas. This works against the need to attract younger demographic, particularly to rural areas to maintain the future viability of rural economies.
To improve accessibility to services and facilities for all ages across the District	~	~	~	
To encourage and facilitate increased	~	~	~	

engagement in cultural and leisure activities				
To improve efficiency in land use and encourage the prudent use of natural resources	~	~	~	It would be more efficient use of land to build the size of dwellings needed in the District.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	~	~	
To reduce emissions of Greenhouse gases	?	?	?	Building a greater number of smaller dwellings for an increasing number of smaller households may have a more adverse effect on reducing greenhouse gas emissions.
To minimise the risk of flooding and resulting detriment to people and property	~	~	~	
To maintain, improve and manage water resources in a sustainable way	~	~	~	
To conserve and enhance biodiversity	~	~	~	
To protect and enhance the high quality natural and built environment	~	~	~	
To reduce waste generation and disposal, and achieve the sustainable management of waste	~	~	~	
Conformity with other policy/initiatives: PPS 3 Housing				
Non-conformity:				
Summary: The 2006 Housing Market Assessment of Hastings and Rother forecast the household composition of Rother in 2026 as being comprised of 82% one or two person households. A background Paper to the 2005 Housing Needs Assessment entitled 'Rother – Supply/Demand Analysis 2005' indicates that for private sector housing, the only significant shortfall is for 2 bedroom properties. For affordable housing the largest shortfall is for 1 bedroom properties, but there is also a significant shortfall of 2 bedroom properties. Therefore this option may not be appropriately addressing the housing need.				

Strategy Options: Housing Mix				
Option 2: Aim for a higher target of 40% in rural areas, where the need is greatest.				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	(✓)	(✓)	(✓)	The Housing Needs Assessment figures would seem to justify a higher percentage, at least in rural areas where need is greatest. This option may help increase the choice available to younger people and first time buyers still further and support more balanced and inclusive communities in the rural areas
To improve the health and well-being of the population and reduce inequalities in health	(✓)	(✓)	(✓)	
To reduce crime and the fear of crime	~	~	~	
To reduce deprivation and social exclusion	(✓)	(✓)	(✓)	Option is helping address housing needs in rural areas and particularly aiming to attract the younger demographic, particularly to rural areas, where currently they suffer with affordability to house price difficulties and a predominant supply of larger dwellings.
To raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	(✓)	(✓)	(✓)	Option is supporting rural economies.
To improve accessibility to services and facilities for all ages across the District	(✓)	(✓)	(✓)	Improving access to suitable housing.

To encourage and facilitate increased engagement in cultural and leisure activities	~	~	~	
To improve efficiency in land use and encourage the prudent use of natural resources	(✓)	(✓)	(✓)	More efficient use of land is made by building appropriate mix of housing.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	~	~	
To reduce emissions of Greenhouse gases	?	?	?	Building a greater number of smaller dwellings for an increasing number of smaller households may have a more adverse effect on reducing greenhouse gas emissions.
To minimise the risk of flooding and resulting detriment to people and property	~	~	~	
To maintain, improve and manage water resources in a sustainable way	?	?	?	Building a greater number of smaller dwellings for an increasing number of smaller households may result in increased water use – consider sustainable construction techniques to minimise water use.
To conserve and enhance biodiversity	~	~	~	
To protect and enhance the high quality natural and built environment	~	~	~	
To reduce waste generation and disposal, and achieve the sustainable management of waste	~	~	~	
Conformity with other policy/initiatives: PPS 3 Housing				
Non-conformity:				
Summary: A higher proportion of one and two bed properties than the current local plan requirement of 30% would seem to be heavily supported by evidence. The option should be better able to positively address the SA Objectives relating to housing, health and well-being, reducing deprivation, sustaining economic growth, accessibility to appropriate housing and arguably efficiency in land use.				

ENVIRONMENT

Strategy Options: Design in the Built and Natural Environment

Option 1: Maintain a general expectation of design quality as a consideration in the planning process (strategy emphasis: maintaining existing Local Plan position which seeks to ensure development respects character and appearance of locality)

Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	(✓)	(✓)	(✓)	Design policies should not affect the ability to provide enough affordable dwellings. Local Plan Policy GD1 goes some way to ensuring sustainable construction through the promotion of efficient use of energy and water through layout and design. Contributing to providing decent homes.
To improve the health and well-being of the population and reduce inequalities in health	~	~	~	Whilst good site and dwelling design can have positive effects on the well-being of residents, design options do not specifically address amenity provision or access to health services.
To reduce crime and the fear of crime	(✓)	(✓)	(✓)	Good design of new developments can help to reduce fear of crime by avoiding creating negative spaces such as unlit alleyways. Option does not specifically mention designing out crime and therefore could score more positively.
To reduce deprivation and social exclusion	~	~	~	Design options themselves cannot address deprivation and social exclusion. As part of new development good design can facilitate access to amenities and good quality builds can help to improve and regenerate areas.
To raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	

To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	(✓)	(✓)	(✓)	High quality of design and build and attractive communities make the District a more desirable place to live and work and so supports continued economic growth.
To improve accessibility to services and facilities for all ages across the District	~	~	~	Whilst good design can facilitate new walkways and improve connectivity in some respects other aspects of development have more significant opportunities to affect this objective (for example, mixed use developments and planning gain).
To encourage and facilitate increased engagement in cultural and leisure activities	~	~	~	
To improve efficiency in land use and encourage the prudent use of natural resources	~	~	~	It is efficient use of land to build to the highest quality of design.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	~	~	Option seeks to ensure priority to pedestrians in highway design and provision of linkages to existing development
To reduce emissions of Greenhouse gases	~	~	~	Option does promote the efficient use of energy (GD1) which could contribute to reducing greenhouse gas emissions but does not require any specific standards to be met in regards to greenhouse gas emissions or energy efficiency.
To minimise the risk of flooding and resulting detriment to people and property	~	~	~	
To maintain, improve and manage water resources in a sustainable way	~	~	~	Option does promote the efficient use of water (GD1) but does not require any specific standards to be met in regards to the sustainable management of water resources.
To conserve and enhance biodiversity	(✓)	(✓)	(✓)	Element GD1 of this strategy option does seek to protect habitats of ecological value. Option could go further by seeking to enhance the ecological value of sites or surrounding areas.
To protect and enhance the high quality natural and built environment	(✓)	(✓)	(✓)	This option does seek to protect the built and natural environment by ensuring development respects and does not

				detract from it. However design objectives are not clear and the District has been disadvantaged at the Planning Appeal stage for not having clearer design policy and locally specific policies.
To reduce waste generation and disposal, and achieve the sustainable management of waste	~	~	~	Waste is addressed through County waste planning and through sustainable resource management options.
Conformity with other policy/initiatives:				
Non-conformity:				
Summary: This option is broadly supportive of providing sustainably constructed homes, reducing fear of crime, sustaining economic growth, conserving biodiversity, protecting the natural and built environment. The option could score more positively against these objectives with clearer design criteria and locally specific policies.				

Strategy Options: Design in the Built and Natural Environment Option 2: set achieving high design quality as a central theme in the planning process (strategy emphasis: strengthened policies for design quality and landscape stewardship using key design principles including: character & legibility; continuity & enclosure; quality of public realm & ease of movement; diversity landscape setting of buildings and settlements; design in context; building appearance & architectural quality; and sustainable design))				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	✓	✓	✓	Option seeks to use sustainable design criteria in the planning process to ensure sustainable construction.

To improve the health and well-being of the population and reduce inequalities in health	~	~	~	Whilst good site and dwelling design can have positive effects on the well-being of residents, design options do not specifically address amenity provision or access to health services.
To reduce crime and the fear of crime	(✓)	(✓)	(✓)	Good design of new developments can help to reduce fear of crime by avoiding creating negative spaces such as unlit alleyways. Option does not specifically mention designing out crime and therefore could score more positively.
To reduce deprivation and social exclusion	~	~	~	Design options themselves cannot address deprivation and social exclusion. As part of new development good design can facilitate access to amenities and good quality builds can help to improve and regenerate areas.
To raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	✓	✓	✓	The option is considered to provide a more rigorous assessment of design quality. High quality of design and build and attractive communities make the District a more desirable place to live and work and so supports continued economic growth.
To improve accessibility to services and facilities for all ages across the District	~	~	~	Option does include criteria to be developed for 'Ease of Movement' principles, which presumably will concentrate on ease of movement through and within the development site and whilst good design can facilitate new walkways and improve connectivity in some respects other aspects of development have more significant opportunities to affect this objective (for example, mixed use developments and planning gain).
To encourage and facilitate increased engagement in cultural and leisure activities	~	~	~	
To improve efficiency in land use and	~	~	~	It is efficient use of land to build to the highest quality of

encourage the prudent use of natural resources				design.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(✓)	(✓)	(✓)	Design criteria include Ease of Movement and assessment here assumes that pedestrian and cycle movement is a priority. If the criteria include facilitating pedestrian movement within as well as to and from the site this could score more positively. More information regarding the design principles for this area could improve the performance against this objective.
To reduce emissions of Greenhouse gases	?	?	?	Design criteria include 'Sustainable Design' which should seek to ensure energy is used efficiently and 'Ease of Movement' which should encourage mobility by non-car modes. More detail of the design principles being developed for sustainable design should enable a more positive assessment against this objective.
To minimise the risk of flooding and resulting detriment to people and property	~	~	~	
To maintain, improve and manage water resources in a sustainable way	(✓)	(✓)	(✓)	Design criteria include 'Sustainable Design' which should take account of the sustainable management of water resources. More detail regarding the criteria for sustainable design should provide positive results.
To conserve and enhance biodiversity	?	?	?	This option does not specifically indicate how biodiversity will be conserved and enhanced – consider adding design principle to include the protection and enhancement of ecological and geological assets or further explanation of how biodiversity will be covered under the existing design principles.
To protect and enhance the high quality natural and built environment	✓	✓	✓	This option aims to make design quality a central consideration in the planning process and ensure constantly improving design standards
To reduce waste generation and disposal, and achieve the sustainable management of waste	~	~	~	Waste is addressed through County waste planning and through sustainable resource management options.

Conformity with other policy/initiatives: PPS1 requirement for Local Authorities to prepare robust policies on design; PPS3 Housing; By Design – Urban Design in the Planning System (ODPM / CABE 2000)
Non-conformity:
Summary: The option has greater potential for more positive effects against a number of the SA Objectives. Option could be improved further by including design principles covering crime and biodiversity. The option should score more positively when details of the criteria under each key principle are developed. Providing clear criteria against which design quality can be tested should facilitate the successful implementation by development control and consequently improve design quality across the District.

Strategy Options: Biodiversity and Greenspace				
Option 1: Using existing policy to conserve and enhance natural green space when opportunities arise (strategy emphasis: continue to identify improvements in association with development schemes. Main areas of change: NE Bexhill, sites in Hastings Fringe, Rye and Battle: mainly as a result of landscaping, buffer strips, links and recreation, in association with a generic policy)				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	~	~	~	
To improve the health and well-being of the population and reduce inequalities in health	(✓)	(✓)	(✓)	Health and well-being can be improved by good access to greenspace for leisure and recreation. The option provides opportunities to focus resources to areas where there is most pressure for improving this access.

To reduce crime and the fear of crime	~	~	~	Whilst this option is not judged to have a positive or adverse effect on crime, badly designed greenspace can provide opportunities to perpetuate the fear of crime and it is vital that all new greenspace provision follows principles to design out crime and create spaces usable by all members of the community. This may also depend upon how the space is managed.
To reduce deprivation and social exclusion	~	~	~	
To raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	Open space provision, in the form of school playing fields and sports provision, is important for balance and opportunity during the educational life of children.
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	~	~	
To improve accessibility to services and facilities for all ages across the District	(✓)	(✓)	(✓)	The option should make a positive contribution to improving accessibility to greenspace by improving the quality and quantity of it where it is most needed or lacking and by providing greenspace as linkages from developments to other facilities.
To encourage and facilitate increased engagement in cultural and leisure activities	(✓)	(✓)	(✓)	This option should facilitate increased engagement in leisure activities by improving the provision of greenspace areas accessible for leisure activities.
To improve efficiency in land use and encourage the prudent use of natural resources	~	~	~	Impact assumed to be neutral, recognising in this option that open space requirements are driven by District policy and future housing completions (i.e. need to meet dwelling targets) and this will have a medium / long-term effect on the pattern and therefore efficiency of land use.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	~	~	

To reduce emissions of Greenhouse gases	~	~	~	
To minimise the risk of flooding and resulting detriment to people and property	(✓)	(✓)	(✓)	Certain areas of open space will be able to act as a buffer zone where there is a potential for flooding.
To maintain, improve and manage water resources in a sustainable way	?	?	?	Potential for areas of urban open space to be employed in the use of SuDS.
To conserve and enhance biodiversity	~	~	~	There may be some incidental benefit for biodiversity through this option, but the option does not specifically address enhancing biodiversity. The option could be strengthened in this respect to achieve a positive effect against this objective.
To protect and enhance the high quality natural and built environment	(✓)	(✓)	(✓)	This option is designed to help mitigate developments in respect of their setting in the landscape through the use of buffer strips and landscaping areas.
To reduce waste generation and disposal, and achieve the sustainable management of waste	~	~	~	
Conformity with other policy/initiatives:				
Non-conformity:				
Summary: The option presents opportunities for a number of beneficial effects on SA Objectives concerning health and well-being, accessibility, engagement in leisure activities, minimising the risk of flooding and protecting and enhancing the natural and built environment. The option is however limited to improvements where development is proposed and does not as such take a strategic overview of greenspace provision in the District or of the multifunctional nature that greenspace can offer through its ability to mitigate flooding, provide land for sustainable drainage and provide wildlife corridors to support and enhance biodiversity.				

Strategy Options: Biodiversity and Greenspace

Option 2: Use of ANGst model to build up evidence base by mapping sites and identify areas where potential for improvement. Provides a district wide framework. (Strategy emphasis: Will provide a systematic approach to the district wide provision of green space which can be used to identify shortfalls. This will also take on board identification of green networks. Main areas of change: New development and urban fringe. Also ancient woodland coastal habitats. Cross boundary approach Romney Marsh Living Landscape. Identification of district wide networks and linkages.)

Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	~	~	~	
To improve the health and well-being of the population and reduce inequalities in health	(✓)	(✓)	(✓)	Health and well-being can be improved by good access to greenspace for leisure and recreation. The option would be based upon accepted standards of provision and would therefore identify shortfalls in provision and consequently provides opportunities to focus resources to areas where there is most pressure for improving this access.
To reduce crime and the fear of crime	~	~	~	Whilst this option is not judged to have a positive or adverse effect on crime, badly designed greenspace can provide opportunities to perpetuate the fear of crime and it is vital that all new greenspace provision follows principles to design out crime and create spaces usable by all members of the community. This may also depend upon how the space is managed.
To reduce deprivation and social exclusion	~	~	~	
To raise educational achievement levels	~	~	~	Open space provision, in the form of school playing fields and

and develop the opportunities for lifelong learning				sports provision, is important for balance and opportunity during the educational life of children.
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	~	~	
To improve accessibility to services and facilities for all ages across the District	✓	✓	✓	The option is based upon accessibility standards in the provision of green space and so should make a positive contribution to this objective. The option aims to improve accessibility to greenspace by improving the quality and quantity of it where it is most needed or lacking. The option has the ability to address provision in rural areas.
To encourage and facilitate increased engagement in cultural and leisure activities	(✓)	(✓)	(✓)	This option should facilitate increased engagement in leisure activities by improving the provision of greenspace areas accessible for leisure activities.
To improve efficiency in land use and encourage the prudent use of natural resources	?	?	?	Could the identification of strategic networks of green space and linkages or green corridors, result in the more efficient use of land? Regards should be given to the best and most versatile agricultural land and this should be retained where possible.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	~	~	There may be some localised potential for improving travel choice through the creation of green linkages between facilities offering residents the choice to walk or cycle.
To reduce emissions of Greenhouse gases	~	~	~	
To minimise the risk of flooding and resulting detriment to people and property	✓	✓	✓	Greater potential with this option to identify strategic areas to act as buffer zones to mitigate the flood risk to development. Option doesn't preclude the ability to use open space associated with individual development to mitigate flood risk.
To maintain, improve and manage water resources in a sustainable way	(✓)	(✓)	(✓)	Greater scope with this option to identify on a strategic level water courses to be maintained and improved as part of the District wide provision of multifunctional green space. Potential for areas of urban open space to be employed in the use of SuDS.

To conserve and enhance biodiversity	(✓)	(✓)	(✓)	The identification of green networks will be associated with the preservation and enhancement of ancient woodland and coastal habitats which are both important for biodiversity in the District. The emphasis for this option is still underpinned by accessibility standards rather than biodiversity so the option could be strengthened in respect of biodiversity for example, by using the ANGst model and biodiversity evidence to build up the evidence base.
To protect and enhance the high quality natural and built environment	(✓)	(✓)	(✓)	Identifying strategic corridors could help protect the natural environment and the interface with the built environment through urban fringe improvements.
To reduce waste generation and disposal, and achieve the sustainable management of waste	~	~	~	
Conformity with other policy/initiatives: Natural England's ANGst Model; South East Plan and the South East Plan Panel Report and PPS9 in giving importance to biodiversity in greenspace provision.				
Non-conformity:				
Summary: This option would allow an evidence base to be built up to underpin the provision of greenspace and developer contributions. It has greater opportunities for improving accessibility, water resource management and biodiversity than option 1. The option allows elaboration on areas of strategic opportunity identified at the regional level, for example the Romney Marsh Living Landscape coastal habitat in accordance with South East Plan policy NRM4. This option offers a more proactive approach to greenspace provision rather than one that relies on reacting to given development proposals (as with option 1).				

Strategy Options Sustainable resource management

Option 1 Achieve more sustainable development through the promotion and application of new Government targets and set supportive criteria for both efficient use of resources and renewable energy production

Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	(✓)	(✓)	✓	Option contributes to the objective's requirement for sustainably constructed homes. Option will use Government targets that become more demanding over time and will therefore have more positive effects on this objective over the long term.
To improve the health and well-being of the population and reduce inequalities in health	~	~	(✓)	Long terms benefits through future requirements inbuilt into the Code for Sustainable Homes which address health and well-being through daylight, sound insulation, private space and lifetime homes.
To reduce crime and the fear of crime	~	~	~	
To reduce deprivation and social exclusion	~	~	~	Well insulated, solar orientated dwellings may have lower heating requirements and consequent lower fuel bills, which may help to keep the numbers of people in fuel poverty from increasing. Sustainably constructed homes should have reduced running costs through greater water and energy efficiency.
To raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	?	?	There is uncertainty about the true cost of building homes to higher environmental and sustainability standards – unclear what the long terms effects will be in Rother District of increasing

				standards for new homes.
To improve accessibility to services and facilities for all ages across the District	~	~	~	
To encourage and facilitate increased engagement in cultural and leisure activities	~	~	~	
To improve efficiency in land use and encourage the prudent use of natural resources	(✓)	(✓)	✓	Option does not necessarily affect the ability to re-use land and buildings, but should promote the re-use of materials. If greenfield land must be used one could argue that sustainable construction at the least would ensure the most efficient use is made of the site within today's policy context. The option clearly promotes the efficient use of resources.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	~	~	
To reduce emissions of Greenhouse gases	(✓)	(✓)	✓	The government's targets for sustainable development focus on reducing emissions of greenhouse gases and with increasing targets over time this should contribute to meeting this objective.
To minimise the risk of flooding and resulting detriment to people and property	~	(✓)	✓	Until the Government introduces a mandatory level of the Code for Sustainable Homes or a BREAAAM equivalent then flood risk will continue to be addressed through PPS25 methods of SFRA. As the Government introduce mandatory levels this should address flood risk as in the Code for Sustainable Homes.
To maintain, improve and manage water resources in a sustainable way	(✓)	(✓)	✓	Performance of this option will improve over time as the Government introduces higher standards to be met in construction.
To conserve and enhance biodiversity	~	(✓)	✓	Until the Government introduces a mandatory level of the Code for Sustainable Homes or a BREAAAM equivalent then ecological concerns will continue to be addressed through designations and PPS9. As the Government increase the standards to be met in new development, there is likely to be a positive effect on

				this objective as ecology is an assessment category of the Code.
To protect and enhance the high quality natural and built environment	~	~	~	Resultant effects should be neutral as the protection and enhancement of the natural and built environment are covered by other policy. Opportunities for renewable energy production within the AONB may be limited as per PPS22 – only permitted where the objectives of the designation of the area will not be compromised.
To reduce waste generation and disposal, and achieve the sustainable management of waste	~	(✓)	(✓)	Currently construction and demolition produces the most waste by weight of all the waste sectors. As the Government raises the standards for sustainable construction and introduces mandatory levels of the Code this should help address the sustainable management of waste. In terms of reducing waste generation, the responsible sourcing of materials and their environmental impact are a category of the Code and when the higher levels are reached this should help reduce waste generation.
Conformity with other policy/initiatives:				
Non-conformity:				
Summary: the option promotes sustainable resource management in line with the Government's objective for sustainable communities. Beneficial impacts as identified will become greater over time as the Government raises the standards to be met and introduces a mandatory level of the Code for Sustainable Homes and raises this level over time (Level 3 in 2010; Level 4 in 2013) to achieve Code Level 6 by 2016.				

Strategy Options Sustainable resource management

Option 2: Achieve exemplar sustainable development by extending beyond the Government targets and setting locally specific targets and criteria for the efficient use of resources and identify opportunities for renewable energy production.

Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	(✓)	✓	✓	Setting higher standards locally should ensure sustainable construction over the short, medium and long term.
To improve the health and well-being of the population and reduce inequalities in health	(✓)	(✓)	(✓)	Benefits in line with requirements inbuilt into the Code for Sustainable Homes which address health and well-being through daylight, sound insulation, private space and lifetime homes.
To reduce crime and the fear of crime	~	~	~	
To reduce deprivation and social exclusion	~	~	~	Well insulated, solar orientated dwellings may have lower heating requirements and consequent lower fuel bills, which may help to keep the numbers of people in fuel poverty from increasing. Sustainably constructed homes should have reduced running costs through greater water and energy efficiency.
To raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	?	?	?	There is uncertainty about the true cost of building homes to higher environmental and sustainability standards – unclear at this stage the economic impact of building to ‘exemplar’ sustainable construction standards.
To improve accessibility to services and facilities for all ages across the District	~	~	~	
To encourage and facilitate increased engagement in cultural and leisure activities	~	~	~	
To improve efficiency in land use and encourage the prudent use of natural	✓	✓	✓	Option does not necessarily affect the ability to re-use land and buildings, but does promote the re-use of materials. If greenfield

resources				land must be used one could argue that high standards of sustainable construction would ensure the most efficient use is made of the site within today's policy context. The option clearly promotes the efficient use of resources.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	~	~	
To reduce emissions of Greenhouse gases	✓	✓	✓	Requiring higher local standards would contribute to reducing greenhouse gas emissions. All Code levels have a minimum standard for reducing energy/CO ₂ which looks at percentage improvement over target emission rate. Option also commits the Council to identifying opportunities for renewable energy production projects with the aim of contributing to reducing greenhouse gas emissions. .
To minimise the risk of flooding and resulting detriment to people and property	✓	✓	✓	Code level 1 has a minimum requirement for surface water run-off using the Code to set standards would contribute to beneficial effects for this SA Objective.
To maintain, improve and manage water resources in a sustainable way	✓	✓	✓	Requiring higher local standards would contribute to the sustainable management of water resources. All Code levels have a minimum requirement for water consumption.
To conserve and enhance biodiversity	(✓)	(✓)	✓	The consideration of ecology does not have a minimum standard in the Code for Sustainable Homes – clearly as the levels progress more overall points are required and so at the highest level (6) there is a presumption that ecology concerns would be addressed and there is a probability that they will be addressed at lower levels.
To protect and enhance the high quality natural and built environment	(✓)	(✓)	(✓)	Option allows tighter control over the type of construction allowed in the AONB and on rural and greenfield sites.
To reduce waste generation and disposal, and achieve the sustainable management of waste	(✓)	(✓)	✓	There is a minimum requirement for Code level 1 to ensure a site waste management plan is in operation. As standards increase over the life of the plan to stay ahead of rising

				Government standards, waste is likely to be addressed through the provision of household recycling and composting facilities and minimising construction waste arisings.
Conformity with other policy/initiatives:				
Non-conformity:				
Summary: the option aims to place the District at the forefront of sustainable resource management, it ensures better resource management in rural areas and particularly allows for tighter control over greenfield and AONB sites. The option again sees impacts becoming more beneficial over time and this is due to the need to ensure local standards are raised ahead of national standards to maintain the forefront position. There is uncertainty over the economic impacts and this option may place unduly onerous obligations on certain sites that affect their viability – future evidenced-based work in this area will provide a clearer picture.				

ECONOMY

Strategy Options Economy				
Option 1: To make generous provision for sites and premises (Strategy emphasis: anticipates/plans for a “step change” in the economy; involves reducing economic inactivity; promotional of inward investment; provides scope for less out-commuting. Spatial implications: greater land requirement, with focus on both regeneration areas and areas of economic potential; may support more jobs for older people remaining in the labour market)				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	(✓)	(✓)	(✓)	Options aims to promote inward investment and focus on regeneration which could, through a mixed use approach present increased opportunities for providing decent, sustainably

				constructed, affordable homes.
To improve the health and well-being of the population and reduce inequalities in health	(✓)	(✓)	✓	There are links between jobs and health and well being of the population. Option may additionally support jobs for older people to remain in the labour market, which may have benefits for prolonged health and well-being.
To reduce crime and the fear of crime	(✓)	(✓)	(✓)	Mixed-use developments are thought to reduce crime and the fear of crime as the variety of uses provides activity day and night plus commercial security systems that deter criminals. Furthermore regeneration of areas may help to reduce the fear of crime.
To reduce deprivation and social exclusion	(✓)	(✓)	(✓)	Improvements in job opportunities should help to reduce poverty and regeneration of areas should help to reduce social exclusion.
To raise educational achievement levels and develop the opportunities for lifelong learning	(✓)	(✓)	(✓)	A thriving business economy helps to raise educational achievement levels by providing inspiration and jobs to aim at.
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	✓	✓	✓	Supports economic growth; stimulates economic revival in priority regeneration areas; and reduces economic inactivity
To improve accessibility to services and facilities for all ages across the District	(✓)	(✓)	(✓)	Better access to jobs, improvements in transport and community infrastructure through regeneration and new development.
To encourage and facilitate increased engagement in cultural and leisure activities	~	~	~	
To improve efficiency in land use and encourage the prudent use of natural resources	(X)	(X)	(X)	This option would require greater land requirement (than option 2) and whilst the regeneration focus would be beneficial for improving efficiency in land use – the implication is that additional land with good economic potential (therefore could be where transport links are good) would be required
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and	?	?	?	This may depend upon the location of new employment sites – this would be assessed through the Site Allocations DPD.

reducing car usage				
To reduce emissions of Greenhouse gases	(X)	(X)	(X)	Even with sustainable construction techniques the potential exists for a growth in greenhouse gas emissions with this level of provision for economic growth. Opportunities exist for such developments that generate volumes of additional car traffic
To minimise the risk of flooding and resulting detriment to people and property	?	?	?	Depends upon the locations of new development – this would be further assessed at Site Allocations DPD.
To maintain, improve and manage water resources in a sustainable way	?	?	?	All new development should be built with water efficiency in mind. Other policy should ensure sustainable water resources management for all new development.
To conserve and enhance biodiversity	(X)	(X)	(X)	To some extent this depends upon the location of all the proposed development sites, however this options seeks to make generous provision for sites. Further assessed through the Site Allocations DPD.
To protect and enhance the high quality natural and built environment	?	?	?	This may depend upon the locations of proposed new development sites and their associated environmental impacts.
To reduce waste generation and disposal, and achieve the sustainable management of waste	X	X	X	Option aims to facilitate and encourage growth in businesses and business areas which will have a net increase in waste production. There are opportunities for achieving the sustainable management of waste and these are achieved through other policy.
Conformity with other policy/initiatives: Draft South East Plan priority for economic regeneration in the Sussex Coast Sub-Region				
Non-conformity:				
Summary: This option should deliver broadly beneficial effects for the social and economic objectives; a better understanding of the impacts would be achievable when locations for economic growth and regeneration have been identified. The option is likely to deliver adverse effects on a number of the environmental objectives including efficiency in land use, reducing greenhouse gas emissions, enhancing biodiversity and reducing waste generation. This is inevitable with options that promote growth, which ultimately increases waste, traffic and requires land take. Opportunities exist to mitigate these negative effects by ensuring the sustainable use of resources, sustainable construction and where possible renewable energy generation to supply new development.				

Strategy Options Economy

Option 2: To set aside only modest areas for employment uses (Strategy emphasis: assumes continuation of trends; emphasis on 'smart growth' and employment linked to 'quality of life' moves; importance of upgrading local skills. Spatial implications: less land allocated for employment uses, economic growth more dispersed and based upon existing distribution)

Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	~	~	~	Less opportunity for new mixed-use development and regeneration of existing areas which may have included housing.
To improve the health and well-being of the population and reduce inequalities in health	(✓)	(✓)	(✓)	There are links between jobs, skills levels and health and well being of the population. This option focuses on quality of life and upgrading of local skills which should have a beneficial effect on the health and well-being of the population.
To reduce crime and the fear of crime	~	~	~	
To reduce deprivation and social exclusion	?	?	?	The focus on improving local skills could have beneficial effects, but unclear at this stage how this may be achieved. No indication of regeneration opportunities with this option which could further help deprived areas. No major increase in job opportunities which could further help reduce poverty.
To raise educational achievement levels and develop the opportunities for lifelong learning	(✓)	(✓)	(✓)	Option should have beneficial effects through the element focussed on upgrading local skills. 'Smart growth' indicates higher value/higher tech operations which could help to raise educational achievement levels by providing inspiration and evidence of 'well-paid' jobs to aim at.

To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	(✓)	(✓)	(✓)	Option does seek to encourage innovation in higher value activities through the 'smart growth' incentive. Option does not necessarily promote the same level of inward investment as option 1 or offer the same opportunities for mass job gain or employment opportunities for a wide range of residents.
To improve accessibility to services and facilities for all ages across the District	?	?	?	Unclear how the dispersed growth based upon existing distribution will improve accessibility across the District. There may be opportunity for some localised benefits.
To encourage and facilitate increased engagement in cultural and leisure activities	~	~	~	
To improve efficiency in land use and encourage the prudent use of natural resources	(✓)	(✓)	(✓)	'Smart growth' may be considered to be resource-efficient economic growth and would aim to make the best use of existing employment land and premises and improve the value of such spaces.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	?	?	?	Unclear the levels of traffic generation that may be associated with this option. There are traffic issues around some employment areas in the District, for example, Rye Harbour Road employment area that would need to be overcome before new traffic generating business were introduced.
To reduce emissions of Greenhouse gases	?	?	?	Unclear how this option will address this objective. Whilst limiting development on new/green land may improve efficiency in resource use there may be greater opportunities to reduce greenhouse gas emissions on larger sites, and new-build sites rather than existing refurbishment/change of use or smaller infill opportunities.
To minimise the risk of flooding and resulting detriment to people and property	?	?	?	SFRA to inform. There could be adverse effects on this as, for example, the Rye Harbour Road Employment Area is at risk of flooding.
To maintain, improve and manage water resources in a sustainable way	?	?	?	Unclear how refurbishment/change of use opportunities would deliver sustainable water use measures. All new development should be built with water efficiency in mind. Other policy should

				ensure sustainable water resources management for all new development.
To conserve and enhance biodiversity	(✓)	(✓)	(✓)	Option should help to conserve biodiversity on a District wide level by restricting the provision of new land for employment uses.
To protect and enhance the high quality natural and built environment	(✓)	(✓)	(✓)	Option should help to protect the natural and built environment by restricting the amount of new land set aside for employment uses. Need to ensure refurbishment and change of use activities positively enhance the high quality environment, built and natural.
To reduce waste generation and disposal, and achieve the sustainable management of waste	?	?	?	Unclear at this stage of the option's development what the implications on waste will be.
Conformity with other policy/initiatives:				
Non-conformity:				
Summary: There is more uncertainty in assessing this option as it is not yet clear exactly how smart growth will be delivered and what the changes to existing employment areas will be to accommodate and promote this smart growth. The option should deliver generally positive effects on health and well-being, educational achievement, and economic growth. In terms of environmental impacts this option should have less adverse effects than option 1 and could furthermore have beneficial effects on efficiency in land use and resources, conserving biodiversity and protecting the natural environment.				

TRANSPORT & ACCESSIBILITY

Strategy Options Transport

Option 1: Focus on investment in road and rail transport (Strategy emphasis: reducing intra-regional peripherality. Spatial implications: A21 corridor schemes, development likely to support investment in new stations and roads)

Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	~	~	~	
To improve the health and well-being of the population and reduce inequalities in health	~	~	~	Whilst health can be improved by good access to services and facilities the option is focused on road as well as rail options and increasing roads and road traffic would have an adverse effect on air quality which is directly linked to health, as well increased noise and vibrations in some local circumstances which can affect well-being of residents.
To reduce crime and the fear of crime	~	~	~	
To reduce deprivation and social exclusion	?	?	?	Road and rail infrastructure improvements could help reduce incidents of social exclusion & help reduce poverty through opening development opportunities
To raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	(✓)	✓	✓	New road infrastructure facilitates conditional growth along route corridors, as would new stations. Strategic road building should stimulate economic revival. Tourism will benefit from improved road systems
To improve accessibility to services and facilities for all ages across the District	(✓)	(✓)	(✓)	Improved accessibility District wide through better road links and more railway stations improving journey times within and to and from the District. Indirect beneficial effects for community & public transport using the road system.
To encourage and facilitate increased engagement in cultural and leisure activities	(✓)	(✓)	(✓)	Access to leisure and cultural facilities should be improved by this option. Improved access to tourism facilities which may be leisure or cultural amenities will benefit District residents as well

				as non-residents.
To improve efficiency in land use and encourage the prudent use of natural resources	?	?	?	Whilst road building may not be considered to be the most prudent use of natural resources, this option may offer some gains in respect of this objective through the focus on railway improvements including new stations. The option may be more readily assessed when all the new road proposals, road improvements, railway improvements and new stations have been identified in the context of planned development.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(✓)	(✓)	(✓)	The option should help reduce road congestion on the major roads dissecting the District. There is an element of improving travel choice by focusing investment on railways and potential new railway stations. Option does not produce more significant beneficial effects as it does aim to reduce car use or further expand travel choice by considering pedestrians, cyclists or bus users (except by indirect effect of buses using improved road network).
To reduce emissions of Greenhouse gases	(X)	X	X	Road building will not contribute to reducing greenhouse gas emissions – aside from the emissions generated in construction new roads tend to attract traffic and consequently more emissions. Conversely improvements in the railways should attract increased use and this is seen as positive for reducing emissions.
To minimise the risk of flooding and resulting detriment to people and property	~	~	~	Additional hard-surfacing may contribute to localised flooding issues – need to ensure suitable mitigation in place.
To maintain, improve and manage water resources in a sustainable way	~	~	~	Roads built today should be designed to mitigate adverse effects on the water environment and where possible improve local water quality; however roads are a potential source of polluted run-off from accidents as well as day-to day leakages from exhausts and vehicles that can get into nearby watercourses. Monitoring of water quality can help to realise where roads are inadequately designed to deal with pollution events.
To conserve and enhance biodiversity	(X)	(X)	(X)	This option is likely to have adverse effects on biodiversity in the

				District, through potential for habitat loss, fragmentation and air and water pollution.
To protect and enhance the high quality natural and built environment	?	?	?	Opportunities may exist with this option to help protect the built environment by reducing through traffic and congestion for example. Potential also arises for adverse effects on the natural environment through road or rail building where previously countryside prevailed.
To reduce waste generation and disposal, and achieve the sustainable management of waste	(X)	(X)	(X)	The construction associated with this option is likely to generate waste. Additional railway stations and rail services are likely to increase waste.
Conformity with other policy/initiatives:				
Non-conformity:				
Summary: new road and rail infrastructure is likely to have beneficial effects on the District's business and tourism economies and accessibility both within and to and from the District. There could be some localised improvements in congestion and consequent benefits for some of the built environments. Adverse effects might be expected against the objectives to reduce greenhouse gas emissions, conserve and enhance biodiversity (and the natural environment) and reducing waste generation.				

Strategy Options Transport				
Option 2: Focus on investment in improvements in local transport infrastructure and services (Strategy emphasis: reducing reliance on the car for local journeys. Spatial implications: local schemes, especially in towns, more space on roads for buses and cycling)				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	

To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	~	~	~	
To improve the health and well-being of the population and reduce inequalities in health	(✓)	(✓)	(✓)	Potential for beneficial health effects due to increased opportunities for walking and cycling for local journeys. Improved access by modes other than the car should help to reduce inequalities in health.
To reduce crime and the fear of crime	~	~	~	
To reduce deprivation and social exclusion	~	~	~	May be some beneficial effects for reducing social exclusion through improved access by modes other than the car.
To raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	~	~	Option may not support the rural or tourism economies
To improve accessibility to services and facilities for all ages across the District	?	?	?	Potential for some localised improvements in travel choice – particularly in towns, but unclear how the option will address the needs of the rural communities.
To encourage and facilitate increased engagement in cultural and leisure activities	~	~	~	There may be potential for some local improvements in access to facilitate engagement in such activities.
To improve efficiency in land use and encourage the prudent use of natural resources	(✓)	(✓)	(✓)	Option aims to encourage the prudent use of natural resources through making better use of existing resources, for example, improving efficiency in services, prioritising local movements and reducing reliance on the car over road building.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(✓)	(✓)	(✓)	The option may not be able to address all areas of congestion in the District. Option does aim to improve travel choice and reduce car usage which should contribute to improving air quality.
To reduce emissions of Greenhouse gases	(✓)	(✓)	(✓)	Option should have beneficial effects on reducing greenhouse gases both through promoting and facilitating modes of travel

				other than the car and by not building significant new stretches of road and railway.
To minimise the risk of flooding and resulting detriment to people and property	~	~	~	
To maintain, improve and manage water resources in a sustainable way	~	~	~	
To conserve and enhance biodiversity	~	~	~	There may be opportunities for beneficial effects on biodiversity through the employment of multi-functional green networks that serve as cycle/pedestrian routes as well as biodiversity corridors.
To protect and enhance the high quality natural and built environment	~	~	~	
To reduce waste generation and disposal, and achieve the sustainable management of waste	~	~	~	
Conformity with other policy/initiatives:				
Non-conformity: the Draft South East Plan recognition of the importance of strategic transport infrastructure to achieving regeneration and sustainable economic growth in the Sussex Coast.				
Summary: This option is judged to be generally positive in respect of the SA Objectives for health, efficiency in land use, increasing travel choice and reducing greenhouse gas emissions. Without further detail of specific local schemes to be implemented it is hard to assume precise benefits or disbenefits to particular local communities which may be applicable through implementation of this option. There are a number of SA Objectives against which effects are judged to be neutral – it may be possible with increasing detail to enhance some of these to beneficial effects. The main uncertainty and one of the balancing factors in judging neutral effects is that of the rural communities and how they would be served by this option. Clearly more opportunity exists in the urban areas and particularly the town to deliver this option to its full potential. Furthermore the option does not assist the District in terms of asserting its identity within the sub-region and reducing the District's peripheral nature.				

The Preferred Strategy for Overall Spatial Development is to:

- (a) plan to meet the policy and development requirements of the South East Plan, including 5,600 - 5,850 dwellings, together with 100,000 square metres of business floorspace and some 5,000 square metres of convenience sales floorspace, the distribution of which will accord with the following spatial strategy and maintain an approximate balance of development between the 'Sussex Coast' and 'rest of County' parts of the district;
- (b) provide for new development in a timely manner, insofar as it contributes to both strategic and local development needs, and the availability of infrastructure;
- (c) make the most effective and efficient use of land within the main built-up confines of towns and villages, especially previously developed land, consistent with maintaining their character;
- (d) focus new development at Bexhill, giving particular attention to promoting economic regeneration and growth of the Hastings and Bexhill area, including through major mixed use developments;
- (e) promote, in concert with Hastings Borough Council, opportunities for sustainable urban extensions on the edge of Hastings in line with a shared vision for it and Bexhill;
- (f) provide for some development in Battle and Rye that helps maintain their small market town roles and is consistent with their respective environmental constraints;
- (g) give particular attention to meeting local needs and supporting vibrant and mixed rural communities, including limited growth of a number of villages that contain a range of services, where new development will help support and, where appropriate, improve such services, contribute to local housing needs and be compatible with the character and setting of the village;
- (h) allow for small-scale infill and redevelopment particularly to enable local needs for housing and community facilities to be met in other villages; and
- (i) give particular attention to the ecological, agricultural, public enjoyment and intrinsic value of the countryside, and continue to generally restrict new development to that for which a countryside location is necessary or appropriate to promoting sustainable land-based industries and sensitive diversification, primarily for employment uses

The Preferred Strategy regarding timing of the Bexhill Hastings Link Road is to:

- (a) Strongly support the early construction of the Link Road as a critical component of the strategy and to work with the respective highway authorities and other bodies to bring this about;
- (b) In the event of the opening of the Bexhill Hastings Link Road not being built or significantly delayed, and this resulting in an anticipated shortfall against housing targets of more than 15% over the forthcoming 5 years, then:
 - (i) action will be taken to bring forward allocations phased later in the Plan period in order to maintain a 5-year supply of readily available housing land. In this event, allocations in higher order service centres will be prioritised, subject to not resulting in a rate of housing development in an individual settlement of more than 10% of its stock in 5 years;
 - (ii) the Core Strategy will be reviewed if the Link Road opening is likely to be after April 2016 and housing or business development levels proposed for Bexhill are expected to fall 30% or more below that projected by 2016.

The Preferred Strategy for Development Boundaries is to:

- (a) Continue to define 'development boundaries' around settlements to differentiate between areas where most forms of new development would be acceptable and where it would not;
- (b) Review existing development boundaries as part of a Site Allocations DPD;
- (c) Determine the appropriateness of development boundaries having regard to:
 - (i) existing pattern, form and function of settlements, including important 'gaps' of countryside between them
 - (ii) character and settings of individual towns and villages
 - (iii) sensitivity to further development both within the main built up confines and in more rural fringes
 - (iv) the amount of land needed to fulfil development needs and requirements
 - (v) availability of local infrastructure and services
 - (vi) accessibility to facilities and services, and avoiding scattered and ribbon development
 - (vii) environmental considerations, including the need to conserve designated areas of national and local landscape, archaeological, geological, ecological or historical importance
 - (viii) following physical features, unless this may suggest a potential for development that is inappropriate

The Preferred Strategy for ensuring appropriately high quality development is to set out generally applicable criteria for new development, embracing:

- (a) Fitness for purpose
- (b) Design quality
- (c) Impact on neighbouring properties
- (d) Impact
- (e) Accessibility
- (f) Character and amenities of the area, especially AONB
- (g) Infrastructure
- (h) Safety, including flood risk and contamination
- (i) Efficient use of energy and resources
- (j) Effective use of land
- (k) Site features and habitats

The Preferred Strategy for determining the most appropriate development locations is to apply the following criteria:

- (a) Accessibility and linkages to jobs, shops and services by non- car modes
- (b) Contribution to 'building communities', including the potential to retain and improve key services
- (c) Landscape and environment, including bio-diversity and heritage
- (d) Physical and infrastructure constraints, incl. flood risk, access
- (e) Resource efficiency potential, incl. SUDS, wind/solar, brownfield, low value land
- (f) Commercial potential, including ownership pattern

The Preferred Strategy for Bexhill is to:

- a) Provide for additional business and employment opportunities within the town, with early development of new space and as part of new mixed use developments
- b) Improve key community infrastructure, especially schools, further education, leisure and health facilities, housing for younger people, and support for older people
- c) Invest in improving the range and quality of existing open spaces and the wider the public realm, with additional multi-functional green space within the urban fringe
- d) Develop an integrated transport strategy that maximises accessibility both to jobs and services in the town and in neighbouring centres, especially Hastings, and to provide the transport capacity necessary to bring forward strategic housing and employment sites as soon as possible
- e) Strengthen the commercial and "civic centre" role of the town centre, including through additional shopping floorspace
- f) Accommodate most business and housing needs through a combination of urban sites and existing allocations for major mixed use developments to the north-east of the town, with further allocations that most effectively support the objectives for the town, the shared vision for Hastings and Bexhill, and meet locational criteria

The Preferred Strategy for the Hastings Fringes is to:

- a) Be pro-active in managing the Hastings urban fringe areas, in close liaison with Hastings Borough Council
- b) Realise opportunities to improve accessibility in the Hastings and Bexhill area
- c) Plan for sustainable urban expansion that supports the shared vision for Hastings and Bexhill and is consistent with traffic and environmental constraints

The Preferred Strategy for Battle is to:

- a) Enable new local employment opportunities and growth in sustainable tourism
- b) Improve and promote timely investment in key community infrastructure, especially schools, leisure and health facilities
- c) To maintain the essential physical form, character and setting of the town
- d) To promote locations for development that reduce the need for cross-town traffic movements and to provide better cross-town transport services and linkages to facilities and services, utilising the reduction in through traffic resulting from the Link Road and to maintain and promote improvements to road and rail connections to London, Tunbridge Wells and Hastings
- e) To provide a vibrant and distinctive town centre, with improved provision for food and other convenience goods
- f) To focus development in providing limited peripheral growth that respects the setting of Battle within the High Weald AONB and supports community facilities

The Preferred Strategy for Rye and Rye Harbour

- a) Consolidate the commercial viability of the Port of Rye through new commercial activity, particularly with seafaring interest, located in Rock Channel and Rye Harbour and there will be greater economic opportunities including in sustainable tourism
- b) Focus on improving local social and economic conditions, both through new learning facilities; as well as an increase in day-to-day services and facilities for the community
- c) Continue to recognise Rye as an important part of the national heritage. Development and change will be managed to respect this, Rye's setting and the important sites of ecological interest. Full recognition will be given to the affects of climate change, sea level rises and flood risk on Rye
- d) Improve accessibility to facilities, with better linkages across the town through the provision of new footpaths, and cycle routes. Better rail and road connections to the town through infrastructure improvements to the Ashford line, and more limited improvements to the A259
- e) Increase day-to-day services and facilities for the community and to retain more local trade
- f) Provide for a relatively limited overall level of development, reflecting the service centre role of Rye but acknowledging the considerable environmental, economic and accessibility constraints

The Preferred Strategy for Villages is to:

- a) Support initiatives and facilities that improve local socio-economic conditions, including local business development in areas of particular need
- b) Make effective use of existing community facilities which support social networks, including schools, village halls and recreation areas
- c) Protect the locally distinctive character of historic buildings and settings, particularly within the Conservation Areas at Burwash, Northiam, Robertsbridge, Sedlescombe, Ticehurst and Winchelsea - in line with Conservation Area Character Assessments where they have been put in place
- d) Improve access to basic day-to-day services, particularly by public transport, walking and cycling
- e) Provide for housing development across a broad spread of villages, having particular regard to their service centre role, available infrastructure and services, local needs and environmental factors

The Preferred Strategy for the Countryside is to:

- a) Conserve and enhance the aspects of natural beauty, historic landscape and character which contribute positively to the countryside; such as the diversity of rural landscapes, ecological habitats (including ancient woodland) and biodiversity value
- b) Support initiatives that enhance the countryside economy, subject to other policies in the plan
- c) Generally limit new development in the countryside, whilst promoting development that supports local community, economic and tourist needs or which improves the rural character. This will be achieved by only allowing development in certain specific circumstances, provided that the locally distinctive character of historic buildings is protected and there will be no adverse impact on the intrinsic value, character and natural resources of the countryside. Such circumstances include:
 - o Conversion of historic farm buildings (as outlined in part b above)
 - o When demonstrably essential to support farming, rural diversification, woodland and land based industries which must be in a countryside location, via new buildings or extensions (including dwellings) provided such development is of appropriate size and directly related to enterprise.
 - o Development of residential 'Exception Sites' to meet identified affordable housing needs, as elaborated upon in the Housing chapter.
 - o For appropriate recreational, leisure and/or tourist facilities that cannot reasonably be located within development boundaries, such as equestrian facilities.

The Preferred Strategy for Communities is to:

For Affordable Housing:

- a) Secure increased provision of affordable housing to address local needs
- b) Make effective use of land and dwellings, and bring forward a range of housing to ensure the needs of local people are met in the community, with particular emphasis on enabling people to get on the housing ladder

For Health, Recreation and Community Facilities:

- Promote healthy, active and participatory communities with a suitable range and quantity of different types of recreational opportunities, health and community facilities that are accessible and of high quality

For Gypsies and Travellers:

- Positively address legal responsibilities regarding the provision of sites for Gypsies and Travellers

For Older People:

- Address the needs of older people in the community

For Crime reduction and Prevention:

- Work with partner authorities to address issues of crime and disorder and promote development that will have a positive impact on the reduction of crime and disorder

The Preferred Strategy for Sustainable Economic Development is to:

- (a) Continue to develop collaborative working between education, training, business support and inward investment agencies to secure sustainable improvements in economic opportunities and performance
- (b) To expand the range employment land and premises, including new strategic sites, and maintain a suitably broad and readily available supply to provide for employment growth that at least matches workforce growth, facilitates higher levels of economic activity and reduces reliance on out-commuting
- (c) To recognise and support the role of tourism in Rother, and to develop sustainable tourism as part of the '1066 Country' programme

The Preferred Strategy for the Environment is to:

For Landscape Stewardship:

- Manage the high quality historic, built and natural landscape character

For Design Quality and the Built Environment:

- Place high quality design centrally in the planning process

For Biodiversity and Greenspace:

- Promote the maintenance of biodiversity and the enhancement of priority habitats and be proactive in identifying a strategic open space network

For Sustainable Resource Management:

- Achieve construction and future operation of development that minimises environmental impact including: energy/CO₂ emissions, air pollution, water use, waste generation and maximises adaptation to climate change.

For Water Supply and Wastewater:

- Promote and encourage the provision of water supply and wastewater infrastructure in an efficient and sustainable way

For Flood Risk:

- Identify and reduce flood risk to people and properties.

The Preferred Strategy for Transport and Accessibility is to:

- a) To give priority to improving strategic transport infrastructure that increases access to jobs and provides the regeneration of the coastal towns
- b) To give further attention to increasing the accessibility of jobs and facilities by the development of an effective public transport network and of safe pedestrian and cycle routes. The potential for further improving the availability of sustainable travel options will be key to development decisions and the focus of area transport strategies
- c) Provide a framework for managing car use

The Preferred Overall Strategy to guide the delivery of development is to:

1. Develop the 'Monitoring Framework' in Appendix 2 in conjunction with the Local Strategic Partnership and lead delivery bodies
2. Monitor and report on progress towards objectives of the Core Strategy in the LDF Annual Monitoring Reports, with specific reference to progress in relation to 'trajectories' for housing and business development;
3. Work closely with East Sussex County Council regarding progress of the Bexhill Hastings Link Road, report any significant delay to the current programme, and make any necessary amendments to the timing or rate of development in accordance with the Overall Spatial Strategy;
4. Develop new guidance setting out how developers will be expected to contribute towards the provision of infrastructure and community facilities associated with their development, either on-site, through a contribution or via off-site provision.

APPENDIX 6 DPD STRATEGIES APPRAISAL

The Preferred Overall Development Strategy for the distribution of development in Rother District up to 2026				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	✓	✓	(✓)	Strategy is contributing to meeting the housing need in the District. There is still some considerable debate regarding overall housing numbers allocated to the region and whether indeed the overall numbers would meet all housing needs now and in the long term. Strategy seeks to give particular attention to meeting local needs.
To improve the health and well-being of the population and reduce inequalities in health	✓	✓	✓	Strategy aims to meet housing and community needs on a spatial basis which should contribute to improving the health and well-being of the population.
To reduce crime and the fear of crime	~	~	~	
To reduce deprivation and social exclusion	(✓)	(✓)	(✓)	The strategy is looking to promote economic regeneration which will help address certain aspects of deprivation. Overall development strategy could consider addressing social exclusion particularly in regard to the siting and phasing of new infrastructure and community facilities and services.
To raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	Education is not explicitly mentioned in this strategy. Improvements in access to employment and job opportunities can contribute to a greater incentive in education to achieve.
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	✓	✓	✓	The economy is given reasonable importance in this strategy which aims to promote economic regeneration in Bexhill and support, with development, the market town roles of Rye and Battle. It also permits development in the countryside which explicitly serves to promote sustainable land-based industries and sensitive diversification to sustain the rural economy. Strategy also considers the long term prospects for the smaller

				villages and settlements in the countryside and identifies that the plan can address the continued sustainability of the rural settlements, particularly in respect of providing for additional community services and facilities through development. The Strategy may also wish to consider safeguarding existing services and facilities in rural settlements.
To improve accessibility to services and facilities for all ages across the District	(✓)	(✓)	(✓)	Access to services and facilities for rural settlements is reasonably well addressed through this strategy which seeks to meet local needs of the communities in villages – need to ensure the continued improvement of access to services and facilities in the larger towns. Rye and Battle area addressed in as much as the strategy aims to maintain their market town roles but accessibility is not explicit and there are known problems of access due to congestion and parking issues in Battle for example. Urban extensions on the Hastings/Bexhill fringes will locate development in near proximity to services and facilities though accessibility considerations not highlighted within specific strategy.
To encourage and facilitate increased engagement in cultural and leisure activities	~	~	~	In part this is addressed within this strategy which seeks to pay particular attention to public enjoyment of the countryside (for leisure). Strategy could consider including a cultural element – particularly as the District has such rich cultural resources.
To improve efficiency in land use and encourage the prudent use of natural resources	✓	?	?	The strategy has clear direction for making the most effective and efficient use of land, prioritising previously developed land. Strategy could also consider making efficient use of existing buildings and bringing back into use vacant properties. Longer term effects may be slightly less positive as PDL and infill and redevelopment opportunities become scarcer and strategic sites are unlocked as a result of the delivery of the Bexhill Hastings Road Link.
To reduce road congestion and pollution levels and ensure air quality continues to	(X)	(X)	(X)	Road congestion, travel choice and reducing car usage are not explicitly addressed in the strategy; furthermore meeting

improve by increasing travel choice and reducing car usage				development requirements of the South East Plan are likely to add pressures to the existing road infrastructure in terms of increasing congestion and related air pollution. The distribution of development indicated by the strategy follows general principles of sustainability by seeking to locate growth in sustainable, vibrant locations that offer a range of employment and facilities. The development strategy indirectly helps to address this objective through the requirement to provide for local needs in terms of services and facilities which should also help to reduce the need to travel.
To reduce emissions of Greenhouse gases	(X)	X	X	The strategy is not likely to reduce greenhouse gas emissions as it has a strong development focus. An increase in the number of households and businesses in the District will have an adverse effect on reducing greenhouse gas emissions. Other areas of policy (cross-cutting) will help to ensure sustainable construction which should limit the generation of new greenhouse gas emissions.
To minimise the risk of flooding and resulting detriment to people and property	~	~	~	Whilst the strategy does not mention flood risk per se it does acknowledge the environmental constraints of Rye which include a significant area of land at risk from flooding. Flood risk issues are addressed in the cross-cutting policies in the Environment Chapter of the Plan.
To maintain, improve and manage water resources in a sustainable way	~	~	~	Other cross-cutting policy should ensure sustainable management of water resources. In terms of maintaining water resources the development required by the strategy is likely to put pressure on resources.
To conserve and enhance biodiversity	(X)	X	X	The Strategy for Distribution of Development requires accordance with the levels of development set out in the South East Plan. Overall quantities of development proposed by the South East Plan for the District are likely to result in a loss of biodiversity. This is because inevitably there will be development other than redevelopment and infill, which may

				require substantial greenfield land take over the Plan period.
To protect and enhance the high quality natural and built environment	~	~	~	The strategy talks about maintaining the character of settlements, the relationship between them and their landscape settings, other cross-cutting policies on design and landscape will further protect and enhance the high quality natural and built environment.
To reduce waste generation and disposal, and achieve the sustainable management of waste	(X)	X	X	Even with the highest levels of sustainable construction and most effective development distribution patterns the level of development required will ultimately result in increased numbers of households and consequently increased waste generation. Need to ensure sustainable waste management within design of new developments to increase recycling and composting rates.
Conformity with other policy/initiatives: South East Plan				
Summary of Significant Effects: the strategy is likely to produce significant beneficial effects for the Objectives to ensure decent, affordable housing; to improve well-being; to sustain the economy; and in the short to medium term for the Objective concerned with efficiency in land use – though the long-term supply of previously developed land is not certain. The strategy is likely to have significant negative effects for biodiversity, greenhouse gas emissions and waste generation due to the levels of development proposed – mitigation is discussed below. Cumulative and synergistic effects are detailed below.				
Potential Cumulative and Synergistic Effects: potential for cumulative adverse effects relating to increasing greenhouse gas emissions particularly as a consequence of the additional numbers of households that will be travelling around the District (a proportion by car), heating their homes and generating waste in the District (the management and disposal of which generates greenhouse gas emissions) and furthermore new businesses that are attracted into the area as part of the economic drive will also be contributing in these same ways to rising greenhouse gas emissions. Potential for cumulative adverse effects on biodiversity in the District, County and south east due to development proposed for the region and likelihood of habitat fragmentation and destruction. Potential for beneficial cumulative effects on the economy either through achieving economic step change and the encouragement of entrepreneurship bringing in new business investment or through the culmination of economic regeneration projects and rural diversification attracting new business.				
Mitigation: consider addressing: <ul style="list-style-type: none"> • social exclusion in relation to the siting and phasing of new infrastructure and housing • accessibility directly in the strategy to ensure healthy and sustainable modes of transport are forefront 				

<ul style="list-style-type: none"> sustainable construction in overall strategy so underpins whole of the Core Strategy (as in the South East Plan) – this can address emissions, waste, water resource issues, flooding and biodiversity in one statement on sustainable construction cultural and leisure element other than public enjoyment of the countryside; District has rich and diverse cultural heritage 		
Monitoring Proposals:	<ul style="list-style-type: none"> GVA per person Business start up and closures Mode of travel to work and commuting patterns 	<ul style="list-style-type: none"> Unemployment Indices of multiple deprivation
<ul style="list-style-type: none"> greenhouse gas emissions % development on PDL Air quality pollutants 		

Strategy Regarding Timing of the Bexhill Hastings Link Rd				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	(✓)	(✓)	?	The strategy is making a commitment to ensure housing delivery is not affected in the event of a delay to the Link Rd by bringing forward allocations phased later in the Plan period. Less clear what the implications of a review of the Core Strategy will bring if the Link Road opening is post 2016.
To improve the health and well-being of the population and reduce inequalities in health	~	~	~	Whilst ensuring the provision of housing supports this objective this strategy is concerned with maintaining the provision already established by other strategies and so has not been assessed as having a direct impact.
To reduce crime and the fear of crime	~	~	~	
To reduce deprivation and social exclusion	~	~	~	Whilst the timely provision of a suitable range of affordable housing can help to reduce deprivation and social exclusion this strategy is not proposing the quantum or spatial distribution as other strategies do and so is not assessed as having an impact.
To raise educational achievement levels	~	~	~	

and develop the opportunities for lifelong learning				
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	(✓)	(✓)	?	The timely delivery of housing against the annual targets will be important in supporting the economic turnaround highlighted for the District by other strategies and the South East Plan.
To improve accessibility to services and facilities for all ages across the District	~	~	~	Delivering the Link Rd should improve access to services and facilities, particularly jobs; however this strategy is concerned with bringing housing land forward in the event that the road completion is delayed and therefore is not judged to have an impact on accessibility.
To encourage and facilitate increased engagement in cultural and leisure activities	~	~	~	
To improve efficiency in land use and encourage the prudent use of natural resources	?	?	?	The strategy would allow the release of greenfield land ahead of brownfield in order to satisfy any shortfall in housing delivery as a result of a delay to the Link Road.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(✓)	(✓)	(✓)	The strategy clearly indicates strong support for early construction of Link Road as a critical component of overall strategy. Contingency plan prioritises higher order service centres where travel choice is greatest.
To reduce emissions of Greenhouse gases	(X)	(X)	(X)	Construction of a new road and maintaining rates of development do not contribute to reducing emissions of greenhouse gases.
To minimise the risk of flooding and resulting detriment to people and property	~	~	~	
To maintain, improve and manage water resources in a sustainable way	~	~	~	
To conserve and enhance biodiversity	~	~	~	
To protect and enhance the high quality natural and built environment	~	~	~	
To reduce waste generation and disposal, and achieve the sustainable management	~	~	~	

of waste				
Conformity with other policy/initiatives: Local Plan; Structure Plan; Regional Transport Strategy and programme for funding				
Summary of Significant Effects: strategy should help ensure continued delivery of homes in the short to medium term which should support economic growth. Less certainty in the long term for housing delivery in the event of a significant delay.				
Potential Cumulative and Synergistic Effects: growth of the higher order service centres; substantial greenfield land-take;				
Mitigation: consider clarifying what the review of the Core Strategy would deliver				
Monitoring Proposals:		• Affordable housing delivery		• % development on brownfield land
• Housing delivery				

Strategy for Development Boundaries				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	~	~	~	Strategy should not affect housing delivery as the amount of land needed to fulfil development requirements has been taken into account.
To improve the health and well-being of the population and reduce inequalities in health	~	~	~	
To reduce crime and the fear of crime	~	~	~	
To reduce deprivation and social exclusion	~	~	~	
To raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	

To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	?	?	?	Unclear how the strategy differentiates between housing need and economic development needs and whether it could stifle innovation or economic opportunity through restricting development to areas deemed appropriate in terms other than for promoting economic growth.
To improve accessibility to services and facilities for all ages across the District	(✓)	(✓)	(✓)	Development is largely restricted to areas that have access to services and facilities and an availability of local infrastructure and services.
To encourage and facilitate increased engagement in cultural and leisure activities	(✓)	(✓)	(✓)	Development boundaries that preserve the character of towns and villages and important local and national landscape and archaeology facilitate engagement in cultural and leisure activities.
To improve efficiency in land use and encourage the prudent use of natural resources	(✓)	(✓)	(✓)	Strategy is maintaining settlement patterns important in defining the High Weald AONB and preserving important environmental features.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(✓)	(✓)	(✓)	By retaining development boundaries the strategy is helping to control urban sprawl and countryside development which can add to increased car use.
To reduce emissions of Greenhouse gases	~	~	~	
To minimise the risk of flooding and resulting detriment to people and property	~	~	~	
To maintain, improve and manage water resources in a sustainable way	~	~	~	
To conserve and enhance biodiversity	(✓)	(✓)	(✓)	
To protect and enhance the high quality natural and built environment	(✓)	(✓)	(✓)	
To reduce waste generation and disposal, and achieve the sustainable management of waste	~	~	~	
Conformity with other policy/initiatives: High Weald AONB Management Plan; PPS9 Biodiversity				

Summary of Significant Effects: positive effects for protecting the high quality natural and built historic environment and maintaining ease of access to cultural and leisure activities
Potential Cumulative and Synergistic Effects: continued strong identity of the High Weald AONB
Mitigation: consider defining development needs and requirements
Monitoring Proposals: None proposed

Strategy for Ensuring High Quality Development				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	(✓)	(✓)	(✓)	Strategy is ensuring fitness for purpose and therefore contributing to decent homes.
To improve the health and well-being of the population and reduce inequalities in health	(✓)	(✓)	(✓)	Strategy is supportive of this objective as it considers the impact of new development on neighbouring properties, the safety of new development in terms of flood risk and contamination and the accessibility of new development.
To reduce crime and the fear of crime	~	~	~	Crime not specifically mentioned though design quality should include designing out crime.
To reduce deprivation and social exclusion	~	~	~	
To raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	
To sustain economic growth and competitiveness and encourage innovation	~	~	~	

in higher value, lower impact activities				
To improve accessibility to services and facilities for all ages across the District	(✓)	(✓)	(✓)	Supportive as criteria include accessibility.
To encourage and facilitate increased engagement in cultural and leisure activities	(✓)	(✓)	(✓)	Supportive in that criteria consider character and amenities of the area, especially the AONB.
To improve efficiency in land use and encourage the prudent use of natural resources	(✓)	(✓)	(✓)	Criteria include the efficient use of energy and resources and the effective use of land.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	~	~	
To reduce emissions of Greenhouse gases	(✓)	(✓)	(✓)	Efficient use of energy and resources should help to limit the emissions of greenhouse gases.
To minimise the risk of flooding and resulting detriment to people and property	(✓)	(✓)	(✓)	Criteria include the consideration of safety in respect of flood risk.
To maintain, improve and manage water resources in a sustainable way	(✓)	(✓)	(✓)	Efficient use of resources includes water.
To conserve and enhance biodiversity	(✓)	(✓)	(✓)	Criteria include habitats.
To protect and enhance the high quality natural and built environment	(✓)	(✓)	(✓)	Character and amenities of area are specifically included in the criteria
To reduce waste generation and disposal, and achieve the sustainable management of waste	~	~	~	Whilst efficient use of resources is included in the criteria no specific mention of the sustainable management of waste is made.
Conformity with other policy/initiatives:				
Summary of Significant Effects: this strategy is supportive of a number of the SA Objectives but is not judged independently to give rise to significant beneficial effects but will contribute to cumulative effects alongside other strategies.				
Potential Cumulative and Synergistic Effects: in combination with the environment strategy and strategy for the spatial areas potential for significant effects on protecting and enhancing the high quality natural and built environment.				
Mitigation: consider addressing the waste hierarchy				

Monitoring Proposals: none proposed.

Strategy for determining development locations				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	~	~	~	Strategy is not concerned with overall level of provision or aspects directly related to this objective.
To improve the health and well-being of the population and reduce inequalities in health	(✓)	(✓)	(✓)	Supportive of this objective as accessibility and safety and focus on building communities all important to health.
To reduce crime and the fear of crime	~	~	~	
To reduce deprivation and social exclusion	(✓)	(✓)	(✓)	Focus on building communities and access to services should help to reduce deprivation and social exclusion.
To raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	(✓)	(✓)	(✓)	Criteria include consideration of commercial potential and ownership patterns as well as access to jobs.
To improve accessibility to services and facilities for all ages across the District	(✓)	(✓)	(✓)	Accessibility to jobs services and shops a criterion for determining development locations.
To encourage and facilitate increased engagement in cultural and leisure activities	~	~	~	Not specifically identified though 'building communities' should also consider leisure and cultural opportunities.
To improve efficiency in land use and encourage the prudent use of natural	(✓)	(✓)	(✓)	Strategy requires consideration of resource efficiency potential including brownfield land and renewable energy.

resources				
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(✓)	(✓)	(✓)	Accessibility by non-car modes is promoted as part of criterion a).
To reduce emissions of Greenhouse gases	~	~	~	
To minimise the risk of flooding and resulting detriment to people and property	(✓)	(✓)	(✓)	Supportive through inclusion in criteria concerning physical constraints such as flood risk.
To maintain, improve and manage water resources in a sustainable way	(✓)	(✓)	(✓)	Criteria specifically mention SuDS.
To conserve and enhance biodiversity	(✓)	(✓)	(✓)	Landscape and environment, including biodiversity identified in criteria for determination of appropriate locations.
To protect and enhance the high quality natural and built environment	(✓)	(✓)	(✓)	Landscape and environment, including heritage in criteria for determination of appropriate locations.
To reduce waste generation and disposal, and achieve the sustainable management of waste	~	~	~	
Conformity with other policy/initiatives: PPS1 Delivering Sustainable Development				
Summary of Significant Effects: supportive of a number of SA Objectives and overall should produce beneficial effects for delivering sustainable development.				
Potential Cumulative and Synergistic Effects: potential for cumulative beneficial effects for delivering sustainable development and building communities.				
Mitigation: none proposed				
Monitoring Proposals: none proposed.				

Strategy for Bexhill				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	✓	✓	✓	The strategy seeks to bring forward strategic housing sites for major housing growth. Strategy also promotes the housing needs of younger people.
To improve the health and well-being of the population and reduce inequalities in health	✓	✓	✓	Alongside major housing provision that will contribute to improving health and well-being, the strategy calls for investment in quality open space, improved access to leisure and health facilities and improved access to health and training programmes.
To reduce crime and the fear of crime	~	~	~	No explicit mention of crime reduction or safety – other cross-cutting policies on design should address this.
To reduce deprivation and social exclusion	(✓)	(✓)	(✓)	New employment opportunities at Sidley, an area of deprivation under the IMD, improved access to health and training programmes and significant quantity of new housing should help to reduce deprivation. In addition to meeting the housing needs of younger people, consider how to further reduce social exclusion.
To raise educational achievement levels and develop the opportunities for lifelong learning	(✓)	(✓)	(✓)	Improvements to schools, further education and increased employment opportunities sited in this strategy should help to raise achievement levels of students.
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	✓	✓	✓	The strategy has a strong economic focus seeking to strengthen the commercial and “civic centre” role of the town; provide new employment space in the town centre and Sidley and additional retail floorspace in the town centre. Providing the transport capacity and particularly the road link should also support the businesses operating in the area and attract new investment. In

				aiming to help younger people onto the housing ladder and therefore remain or move to the area the strategy supports economic growth by helping to maintain the workforce.
To improve accessibility to services and facilities for all ages across the District	✓	✓	✓	The development of a wide ranging sustainable transport strategy, alongside improved transport capacity, providing for major growth in accessible locations and improved community infrastructure should collectively have beneficial effects for this SA Objective.
To encourage and facilitate increased engagement in cultural and leisure activities	(✓)	(✓)	(✓)	Improvements in leisure facilities and the range and quality of open space and the wider public realm including the seafront and Pebsham Countryside Park should help to encourage participation in leisure activities. The strategy does not explicitly mention cultural facilities although strengthening the towns “civic centre” role may promote cultural identity and activities.
To improve efficiency in land use and encourage the prudent use of natural resources	~	(X)	X	Opportunities within the town may be developed prior to the strategic sites due to infrastructure constraints associated with the strategic sites; therefore in the shorter term efficient use of land is likely with the focus on development within the town. In the longer term the development of greenfield and prime agricultural sites could not be seen as efficient or necessarily prudent use of land resources.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(✓)	(✓)	✓	The development of a wide ranging sustainable transport strategy and the spatial aspects of the strategy in terms of locating development in accessible locations and improving key infrastructure should help to reduce car usage and increase travel choice. The completion of the Link Rd in the longer term will also help reduce road congestion.
To reduce emissions of Greenhouse gases	(X)	(X)	X	The level of growth planned for Bexhill through this strategy will increase the number of households in the area and this will generate additional greenhouse gas emissions through heating homes, additional car trips and waste generation. In the longer term the new Link rd will also attract new car and lorry

				movements that will generate greenhouse gas emissions.
To minimise the risk of flooding and resulting detriment to people and property	~	~	~	No major sites in or around Bexhill are in the floodplain. Other cross-cutting policy ensures SuDS where appropriate and avoidance of areas of high flood risk.
To maintain, improve and manage water resources in a sustainable way	?	?	?	Whilst other cross-cutting policy will ensure sustainable management of water through use of SuDS where applicable, Flood Risk Assessment where necessary, the level of development proposed at Bexhill will undoubtedly require additional water supply and wastewater infrastructure to meet the demand arising. Managing demand involves encouraging installation of water conservation measures such as low flow taps, showers, low flush toilets and water butts.
To conserve and enhance biodiversity	(X)	(X)	X	The strategic sites for major growth around Bexhill consist of greenfield land which has a biodiversity value that will be lost. The strategy has some beneficial aspects for biodiversity including the multifunctional greenspace associated with the urban fringe. However much of the proposed open space is to be managed for public enjoyment and not for its biodiversity value. The importance of biodiversity corridors could be highlighted given the extent of proposed development for the area.
To protect and enhance the high quality natural and built environment	~	~	~	The strategic development proposed for the Bexhill fringes provide an opportunity to improve the built form and character setting of Bexhill in its landscape; however it could be less easily argued that the loss of greenfield and agricultural land around the fringes of Bexhill would not be protecting or enhances the natural environment.
To reduce waste generation and disposal, and achieve the sustainable management of waste	X	X	X	Increasing the number of households and businesses in the area will increase the amount of waste generated; furthermore the construction of new development will generate significant waste as will the construction of the Link Road.
Conformity with other policy/initiatives: South East Plan's spatial distribution of development for the Sussex Coast sub-region;				

PPS3 Housing; PPS1 Delivering Sustainable Development		
<p>Summary of Significant Effects: the level of growth proposed for Bexhill is consistent with the South East Plan direction and constitutes a key strategic element of the Core Strategy. This growth level should have beneficial effects for the SA Objectives concerned with housing, health and well-being, reducing deprivation and sustaining the economy due the opportunities that exist for decent affordable new homes and accessible new employment opportunities. The pattern of development as well as investment in key community infrastructure should also facilitate access to key community services and facilities. Public realm and open space improvements and investment in leisure facilities should encourage increased engagement in leisure activities. The likelihood for efficient use of land resources reduces over time as the greenfield sites and the new road come on stream, this latter point would contribute to reducing road congestion in the long term. Emissions of greenhouse gases and waste generation will continue to rise due to the level of development proposed and the construction and operation impacts of these projects. Effects on biodiversity will be adverse due to the extent of habitat loss likely from the development of the greenfield sites surrounding Bexhill.</p> <p>Potential Cumulative and Synergistic Effects: potential for cumulative effects relating to rising greenhouse gas emissions in the District and increased waste generation would also contribute to greenhouse gas emissions due to increased transport requirements and if a rise in the tonnage of waste going to landfill is experienced. Cumulative and possibly synergistic effects of new housing, employment opportunities, improvements in community services and facilities as well as improved access could serve to bring those wards currently experiencing deprivation according to the IMD, out of deprivation and into vibrant, sustainable communities.</p>		
<p>Mitigation: consider addressing:</p> <ul style="list-style-type: none"> • Biodiversity loss and how ecological gains can be achieved through the strategy (green infrastructure; habitat restoration/creation) • Infrastructure requirements for strategic sites other than transport capacity - particularly water supply and wastewater treatment and waste management infrastructure 		
<p>Monitoring Proposals:</p> <ul style="list-style-type: none"> • greenhouse gas emissions • % development on PDL • Air quality pollutants • Business start up and closures 	<ul style="list-style-type: none"> • Tonnage and % waste generated • Tonnage & % waste landfilled and recycled • Indices of Multiple Deprivation (particularly for Sidley and Town Centre Wards) 	<ul style="list-style-type: none"> • Mode of travel to work • Access to services and facilities • Provision and quality of open space • % appeals successfully defended on design grounds

Strategy for the Hastings Fringes				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	(✓)	(✓)	(✓)	Strategy plans for urban extension to provide new communities in line with the shared vision for Hastings and Bexhill.
To improve the health and well-being of the population and reduce inequalities in health	~	~	~	Judged as neutral though acknowledged that the strategy is seeking to improve accessibility and provide development sustainably
To reduce crime and the fear of crime	~	~	~	
To reduce deprivation and social exclusion	~	~	~	
To raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	(✓)	(✓)	(✓)	Supportive of economic growth through planning for urban expansion and improving accessibility to jobs in the Hastings and Bexhill area.
To improve accessibility to services and facilities for all ages across the District	(✓)	(✓)	(✓)	
To encourage and facilitate increased engagement in cultural and leisure activities	~	~	~	
To improve efficiency in land use and encourage the prudent use of natural resources	(✓)	(✓)	(✓)	In requiring the management of the Hastings fringes the strategy is aiming to improve efficiency in land use – developing where it is prudent to do so in terms of traffic and environmental constraints and where accessibility (by modes other than the car) can be facilitated and improved.

To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(✓)	(✓)	(✓)	The aim of the strategy is to reduce road congestion by developing in strategic locations on the Hastings fringes where transport by modes other than the car can be promoted and access to the Hastings and Bexhill areas for work and leisure can be improved.
To reduce emissions of Greenhouse gases	~	~	~	Urban expansions are likely to adversely affect this objective but this has been assessed under the overall Spatial Development Strategy.
To minimise the risk of flooding and resulting detriment to people and property	~	~	~	
To maintain, improve and manage water resources in a sustainable way	~	~	~	
To conserve and enhance biodiversity	~	~	~	Whilst there may be the loss of some greenfield land through the urban expansion the pro-active management of the fringes and the acknowledgement of the environmental constraints seeks to ensure biodiversity considerations are included.
To protect and enhance the high quality natural and built environment	(✓)	(✓)	(✓)	
To reduce waste generation and disposal, and achieve the sustainable management of waste	~	~	~	Waste generation as a result of the overall level of development was assessed in the overall Spatial Development Strategy.
Conformity with other policy/initiatives: conformity with the shared vision for the Bexhill and Hastings area and therefore in conformity with the Hastings LDF.				
Summary of Significant Effects: beneficial effects for accessibility and the economies of Bexhill and Hastings as well for reducing congestion and increasing travel choice.				
Potential Cumulative and Synergistic Effects: potential for enhanced economic performance in combination with the Bexhill Strategy and Strategy for the Economy				
Mitigation: none proposed				
Monitoring Proposals: none proposed				

Strategy for Battle				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	(✓)	(✓)	(✓)	Strategy is proposing development which is taken to include housing and is contributing to the overall housing need but the strategy does not point out how this will be meeting local need in terms of quantity or specific local affordability issues.
To improve the health and well-being of the population and reduce inequalities in health	?	(✓)	(✓)	Health and well-being benefits can be gained, for example, through the provision of the appropriate level, type and mix of housing, investment in health and community facilities, the improvement of leisure facilities including open space and public rights of way. Although not specific, the strategy identifies key community infrastructure, leisure and health facilities for improvement and investment. Improving air quality through reducing congestion can be considered as contributing to improving health. Any improvements may take time to filter through to become material changes.
To reduce crime and the fear of crime	~	~	~	Cross-cutting policy on design should ensure safety is considered in the design of new development.
To reduce deprivation and social exclusion	?	(✓)	(✓)	Battle is not identified as having a problem with deprivation using the IMD statistics. Improved employment opportunities and investment in education facilities are both beneficial to maintaining Battle's relatively privileged status. Need to ensure consideration is given to promoting social inclusion in the siting and phasing of new development. The commitment to improving and promoting investment in key community infrastructure, leisure and health facilities should help to support social inclusion, however these may rely on contributions from

				development which may take time to filter through.
To raise educational achievement levels and develop the opportunities for lifelong learning	✓	✓	✓	Provisions made in the strategy for enabling new employment opportunities and the timely investment in new education facilities should have beneficial effects for raising educational attainment.
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	✓	✓	✓	Enabling new employment opportunities and growth in tourism, coupled with the provision of a vibrant and distinctive town centre with new retail floorspace, better road and rail connections to London, Tunbridge Wells and Hastings and improved traffic movements across town, should contribute to beneficial effects for the local economy.
To improve accessibility to services and facilities for all ages across the District	(✓)	✓	✓	The strategy has a strong accessibility focus concerned with improved cross-town transport services for better linkages to facilities and services, improved rail connections to Hastings, Tunbridge Wells and London and a development pattern that promotes locations that reduce the need for, particularly, cross-town traffic movements thereby providing better access for residents to the everyday services they need.
To encourage and facilitate increased engagement in cultural and leisure activities	(✓)	✓	✓	In maintaining the character of the town and its setting within the High Weald AONB, the strategy is considering the historical, cultural importance of the town. Promoting growth in sustainable tourism, which largely focuses on the historical, cultural assets of the town, the strategy is also helping to encourage and facilitate increased engagement in cultural activities. The reference to community infrastructure and leisure and health facilities in the strategy indicates clear direction in improving these facilities within the town. Improvements however may not be immediate, as it may take time for investments to filter through to direct provision.
To improve efficiency in land use and encourage the prudent use of natural resources	(✓)	(✓)	(✓)	The Strategy direction for the provision of a vibrant and distinctive town centre and limited peripheral growth suggests that subsequent development may contribute to the prudent use

				of land. New growth should be concerned with the local issue of reducing cross-town traffic movements and reducing the congestion presently experienced in the town.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(✓)	✓	✓	There is a clear direction in the strategy to reduce congestion and car usage in the town, which should improve air quality in the town centre. The strategy aims to achieve this through appropriate siting of new development to reduce the need to travel across town and by improving cross-town transport services and improving rail connections to Tunbridge Wells, Hastings and London.
To reduce emissions of Greenhouse gases	~	~	(X)	If successful in reducing car usage and traffic movements this would be beneficial for greenhouse gas emissions, however the proposed growth and development indicated by the strategy would result in increased emissions of greenhouse gases in construction and operation over time.
To minimise the risk of flooding and resulting detriment to people and property	~	~	~	There are no major flood issues around Battle, other cross-cutting policy will ensure where appropriate FRA and SuDS in new development.
To maintain, improve and manage water resources in a sustainable way	~	~	~	Other cross-cutting policy on sustainable water management should ensure development has consideration to the sustainable management of water through design of new development; increasing the amount of development in Battle will require additional water to be supplied to the area.
To conserve and enhance biodiversity	?	?	?	The local issues of traffic congestion in the town have provided the strategy with a clear need to focus development so as to reduce the need to travel across town; this may not result in the preservation or enhancement of biodiversity. Other cross-cutting policy should ensure biodiversity impacts are considered and where possible mitigated.
To protect and enhance the high quality natural and built environment	✓	✓	✓	The strategy is clearly concerned with maintaining the essential physical form and character of the town and its setting within the AONB and in relation to Hastings by ensuring the retention of

				the strategic gap.
To reduce waste generation and disposal, and achieve the sustainable management of waste	(X)	(X)	(X)	The provision of new shopping space and new employment explicitly mentioned in the strategy would not reduce waste generation; neither would the delivery of new housing thereby increasing the number of households living in the area. The desire for growth in sustainable tourism should help to reduce rising waste generation in this industry.
Conformity with other policy/initiatives: Battle Area Transport Strategy 2005				
Summary of Significant Effects: The main significant effects can be summarised as beneficial for the SA Objectives relating to housing, education, the economy, accessibility, community infrastructure, cultural, leisure and health facilities, reducing road congestion and protecting and enhancing the built and natural environment. The strategy has clear direction on these issues underpinned by evidence base studies and public consultation during Issues and Options. Furthermore the strategy has a clear local focus having been derived from local issues and is not driven purely by national or sub-regional policy. Uncertainty relating to conserving and enhancing biodiversity due to the strategy not identifying specific areas of search for implementation and allocation.				
Potential Cumulative and Synergistic Effects: potential for cumulative adverse effects from new development including housing, infrastructure, employment premises and new community facilities for rising waste generation – need to ensure a continued increase in % and tonnage of waste recycled, other cross-cutting policy on design and sustainable construction should ensure sustainable waste management is considered and implemented where appropriate. Potential for cumulative adverse effects relating to the conservation and enhancement of biodiversity as the prime importance locally for Battle is to improve the congestion issues across the town by locating new development where it can help reduce the need for cross-town movements – this may not accord with the preservation of biodiversity – cross-cutting environmental policy should help to mitigate biodiversity loss at the District level.				
Mitigation: consider: <ul style="list-style-type: none"> • Stating the level of proposed housing provision and how this will serve local needs • Providing a clearer indication of the areas of search within and outside the development boundary • Provision of open space and public rights of way may further contribute health and leisure objectives. • Whether the strategy could be more explicit in identifying the cultural importance of Battle and how it aims to increase engagement in cultural activities through growth in sustainable tourism for example 				
Monitoring Proposals: <ul style="list-style-type: none"> • Air quality in town centre • Mode of travel to work 	<ul style="list-style-type: none"> • Additional new employment floorspace • Accessibility to public transport 		<ul style="list-style-type: none"> • Tourism spend / accommodation rates • Visits to 1066 Country website 	

<ul style="list-style-type: none"> Additional new shopping floorspace 	<ul style="list-style-type: none"> Accessibility to services and facilities VAT registered business start ups 	<ul style="list-style-type: none"> Car ownership Satisfaction with parks and open space
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Strategy for Rye and Rye Harbour				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	(✓)	(✓)	(✓)	The strategy indicates that development and change will focus on improving local social conditions and this can be assumed to include housing, however there is no explicit mention of the provision of new housing to meet local needs. There is a known affordability issue in Rye and issues surrounding deprivation and particularly in relation to barriers to housing, so the strategy could be strengthened to make clearer how it will address this issue.
To improve the health and well-being of the population and reduce inequalities in health	(✓)	(✓)	(✓)	The strategy could be strengthened in respect of health by detailing how it will address local housing needs; however the strategy does focus strongly on the need to improve social conditions through improvements in day-to-day services and facilities, better pedestrian and cycle links to such facilities which should contribute to improving general well-being and to a certain extent health.
To reduce crime and the fear of crime	~	~	~	Cross-cutting policy on design should ensure safety is considered in the design of new development.

To reduce deprivation and social exclusion	(✓)	(✓)	(✓)	The prioritisation of improving social conditions and economic opportunities in Rye reflects the underpinning evidence that Rye suffers from deprivation particularly in relation to child poverty and barriers to housing. This could be strengthened further by clarifying how housing needs will be met.
To raise educational achievement levels and develop the opportunities for lifelong learning	(✓)	(✓)	(✓)	The commitment to new learning facilities is sited within the strategy. Improved employment opportunities and commercial viability can indirectly affect educational achievement levels through improved aspirations and prospects.
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	(✓)	✓	✓	The economy of Rye is central to the strategy, as well as an increase in general economic opportunities and better road and rail connections the strategy explicitly concerns itself with sustainable tourism, commercial viability of the Port of Rye and the importance of the increasing commercial activity and associated sea-faring interest to sustain this important local industry.
To improve accessibility to services and facilities for all ages across the District	(✓)	(✓)	✓	There is a strong focus on accessibility within the strategy, both from the perspective of increasing the quantity of services and facilities to improve access and through improvements by way of better linkages for pedestrians and cyclists to these facilities. Improved road and rail connections to the town are also sited, though there are no commitments to funding road or rail improvements.
To encourage and facilitate increased engagement in cultural and leisure activities	(✓)	(✓)	(✓)	The strategy does recognise the importance of the national heritage associated with Rye and suggests development and change will be managed to respect this, which should help retain current levels of activity centred on cultural activities. It does not however indicate how the heritage of Rye may be used to promote increased engagement in cultural activities. Leisure is not explicitly highlighted within the strategy and plans for improvement could be identified.
To improve efficiency in land use and	?	?	?	No mention is made in the strategy of the areas of search for

encourage the prudent use of natural resources				new development or the driving forces behind such areas and therefore it is not clear whether proposed development will be making efficient use of land resources. It is indicated that the overall level of growth for Rye would be limited, acknowledging the environmental constraints but does not go on to reflect where these constraints are that are dictating the areas of search for future development.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	~	~	Reducing road congestion is not explicitly mentioned within the strategy even though there are known congestions issues concerning the A259 as it circumvents Rye and possible congestion issues within and across town. It does have a strong focus on improving accessibility and consequently travel choice, through improved pedestrian and cycle linkages as well as improved rail and road connections. The strategy also identifies the importance of the Port of Rye for transportation of goods by sea though whether increasing sea-faring interests would result in a reduction in the need for road transportation is considered unlikely.
To reduce emissions of Greenhouse gases	~	~	(X)	The strategy does aim to improve accessibility by sustainable modes of transport and limits the overall amount of development that will be assigned to the area; however development and change will increase the number of households living in the area and would be likely to increase greenhouse gas emissions in the long-term.
To minimise the risk of flooding and resulting detriment to people and property	?	?	?	Whilst the strategy gives full recognition to future sea-level rise and flood risk, it concentrates on defending Rye to recognised standards but does not couple this with total avoidance of the floodplain. Rock Channel and Rye Harbour sited in the strategy are both within Flood Zone 3. Areas of search for additional housing allocations are known to be outside of major flood risk areas.
To maintain, improve and manage water	~	~	~	Other cross-cutting policy on sustainable water management

resources in a sustainable way				should ensure development has consideration to the sustainable management of water through design of new development; increasing the amount of development in Rye will require additional water to be supplied to the area.
To conserve and enhance biodiversity	?	?	?	The considerable environmental constraints referred to in the strategy include European sites designated under both the 'Habitats' and 'Birds' Directives. No land would be proposed that directly impacted these sites and other impacts of nearby development will be fully assessed through the Appropriate Assessment, which has already screened the sites for potential impacts. Mitigation recommended by the AA will be undertaken.
To protect and enhance the high quality natural and built environment	(✓)	(✓)	(✓)	The strategy makes clear the importance of Rye to our national heritage and recognises that development and change must respect this, as well as its setting and the surrounding European designated sites. It could be strengthened further to reflect the importance of the archaeological heritage associated with Rye and its proximity to the AONB.
To reduce waste generation and disposal, and achieve the sustainable management of waste	(X)	(X)	(X)	Whilst only 'limited' development is proposed by the strategy there is still an overall requirement for growth and this will increase the number of households in the area and through the construction and operation of this there is likely to be an increase in waste generated. Other policy should ensure sustainable construction techniques and waste minimisation in design and operation coupled with sustainable waste management which should aim to drive up the recycling rates.
Conformity with other policy/initiatives: Rother Local Plan 2006; Rye Harbour Management Plan 2003; South East Plan Sussex Coast Sub-Region				
Summary of Significant Effects: the main significant effects are likely to be centred on sustaining economic growth as the strategy has a strong economic focus; it has identified specific spatial requirements in relation to the local maritime industry and better road and rail connections to the town. Need to ensure no significant adverse effects in relation to increasing flood risk for people and property by following the recommendations of the SFRA, particularly in respect of the siting of new development and the mitigation of development				

on Local Plan (Inspector approved) sites that remain within flood risk areas. Uncertainty also exists for impacts on efficiency in land use and biodiversity as areas of search for new development are not made clear in the strategy; the implication however is that due to environmental constraints development would avoid major flood risk areas and areas within or adjacent to European designated habitat.		
Potential Cumulative and Synergistic Effects: potential for cumulative and synergistic effects from planned new growth on waste generation. Possibility of cumulative and synergistic effects on biodiversity – though the strategy will be guided by the recommendations of the AA which has screened into the assessment both the European sites near Rye. Potential for growth in the Port industry through the combination of improving the commercial viability of the Port through new commercial activity in the Rock Channel area as well as in Rye Harbour.		
Mitigation: consider: <ul style="list-style-type: none"> • Indicating the level of housing provision and how this addresses identified local need – add housing to the sentence “focus on improving local social (<i>housing</i>) and economic conditions” • Adding the word archaeological in relation to national heritage, for example: Rye should continue to be recognised as an important part of the national heritage <i>for its built, natural and archaeological environment s.</i> • Identifying the areas of search in relation to considerable constraints referred to. • Mentioning reducing congestion in relation to access and road and rail improvements. 		
Monitoring Proposals: <ul style="list-style-type: none"> • Planning permissions granted contrary to EA advice • Number of new affordable homes delivered 	<ul style="list-style-type: none"> • Condition of SSSI • IMD particularly in relation to child poverty and barriers to housing • Unemployment • % appeals successfully defended on design terms 	<ul style="list-style-type: none"> • Air quality • Length of new public rights of way

Strategy for the Rural Area (<i>now presented in the Main Consultation Document as Strategy for the Villages and Strategy for the Countryside</i>)		
Sustainability Appraisal Objectives	Assessment	Comments / Proposed Mitigation

	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	✓	(✓)	(✓)	The strategy makes two references to affordable housing in rural areas and a reference to general development which is assumed to relate to housing. It talks about the need to foster vibrant mixed communities by addressing local need in relation to affordable housing. In general the development of housing will be focused on service centres as sustainable accessible locations and exceptionally for key worker housing some redevelopment of former agricultural buildings may be appropriate. Strategy could be strengthened by clarifying how in the main local housing needs, other than for affordable, will be met in rural areas that are not service centres
To improve the health and well-being of the population and reduce inequalities in health	(✓)	(✓)	(✓)	Health and the provision of health facilities are not explicitly referenced in this strategy; other community facilities are highlighted and health facilities could be added into section b). The provision of affordable housing where needed should have beneficial effects for health and well-being. Consider how to address reducing inequalities in health.
To reduce crime and the fear of crime	~	~	~	Cross-cutting policy on design should ensure safety is considered in the design of new development.
To reduce deprivation and social exclusion	(✓)	(✓)	(✓)	By aiming to improve local socio-economic conditions, improve access to day-to-day facilities and services, fostering vibrant viable mixed communities and strong support for rural economies the strategy should have beneficial effects for reducing deprivation and social exclusion.
To raise educational achievement levels and develop the opportunities for lifelong learning	(✓)	(✓)	(✓)	The strategy makes reference to supporting existing schools and improving provision where necessary. Improved economic opportunities within the rural area could also help to raise aspirations and consequently achievement levels.
To sustain economic growth and	✓	✓	✓	There is a strong economic focus to the strategy, which supports

competitiveness and encourage innovation in higher value, lower impact activities				initiatives and facilities that improve local business, farming and other land-based activities, local agricultural enterprise and diversity and tourism. It is not clear in section h) the conversion and redevelopment of small-scale business premises for what business uses this may include or whether it refers to housing. The strategy could be strengthened in respect of economy if point h) is further supporting a business or land-based use.
To improve accessibility to services and facilities for all ages across the District	✓	✓	✓	Improving access to day-to-day services and facilities, supporting and improving existing community facilities and increasing the number of households living in accessible locations should have beneficial effects for this SA Objective.
To encourage and facilitate increased engagement in cultural and leisure activities	(✓)	(✓)	(✓)	One reference to leisure is in point b) which aims to make effective use of (among other things) recreation areas and improve provision where necessary. Enhancing the rights of way network will also help facilitate access to and enjoyment of the countryside for leisure. Support for the tourism industry and particularly tourism that draws on the heritage countryside can also indirectly facilitate increased engagement in cultural and leisure activities. The conservation and enhancement of the AONB which covers a large proportion of the rural area in the District can also contribute to encouraging people to undertake leisure activities. The cultural aspect of this SA Objective has not in itself been explicitly addressed.
To improve efficiency in land use and encourage the prudent use of natural resources	(✓)	(✓)	(✓)	Through points h) and i) the strategy aims to make efficient use of derelict/run down buildings by allowing conversion and redevelopment; point k) supports diversity which can make more efficient use of land and the overall proposed development pattern focussing on service centres can broadly be said to contribute to making efficient use of land. The strategy doesn't specifically encourage efficient use of land; rather the focus is on meeting identified need in as sustainable way as possible.
To reduce road congestion and pollution	(X)	(X)	(X)	Whilst the strategy aims to locate most new development in

levels and ensure air quality continues to improve by increasing travel choice and reducing car usage				accessible, sustainable service centre locations, it also supports growth in rural industries allowing conversions, redevelopment and diversification that enhances farming, land-based activities and tourism. Such activities would be likely to increase the amount of traffic on rural roads and there may not be practical alternative travel options such as public transport for these activities. Even locating new housing in accessible locations may not help reduce car usage as cars are often central to a rural family's way of life.
To reduce emissions of Greenhouse gases	(X)	(X)	(X)	The development proposed by this strategy and particularly the strong support for growth in the rural economy would not be likely to reduce greenhouse gas emissions.
To minimise the risk of flooding and resulting detriment to people and property	~	~	~	Parts of the rural area suffer from poor drainage and fluvial flood risks – the SFRA will guide development to areas of lowest flood risk and cross-cutting policy will ensure where applicable and appropriate FRA and SuDS are implemented.
To maintain, improve and manage water resources in a sustainable way	~	~	~	Other cross-cutting policy on sustainable water management should ensure development has consideration to the sustainable management of water through design of new development; increasing the amount of development in the rural area will require additional water to be supplied to the area.
To conserve and enhance biodiversity	(✓)	(✓)	(✓)	Strategy point g) limits development in the countryside to protect the intrinsic value and diversity of the ecological habitats and makes specific reference to ancient woodland – an important habitat in biodiversity terms.
To protect and enhance the high quality natural and built environment	✓	✓	✓	There is a strong focus on the protection and enhancement of the local character and distinctiveness of the rural area including the AONB. Strategy points e) and f) specifically address this through the protection of locally distinctive buildings and features which contribute positively to the countryside and particular reference to the conservation and enhancement of the natural beauty and historic landscape context of the AONB.

To reduce waste generation and disposal, and achieve the sustainable management of waste	(X)	(X)	(X)	The overall level of development, increasing household numbers in the rural area and the number and productivity of businesses and tourist attractions would not be likely to reduce waste generation. Other cross-cutting policy on sustainable construction and sustainable management of waste should help mitigate the impacts.
Conformity with other policy/initiatives: PPS7 Sustainable Development in Rural Areas				
Summary of Significant Effects: significant beneficial effects should be experienced for SA Objectives relating to housing, accessibility, the economy and the protection and enhancement of the high quality built and natural environment. The strategy aims to sanction changes where necessary that do not compromise the preservation and enhancement of high quality rural area. Changes that stimulate and maximise the economic and tourist potential of the countryside in the context of sustainability principles. The strategy could be strengthened to have more significant effects for SA Objectives relating to culture, health, social inclusion and efficiency in land use; these are detailed in the mitigation section below. There are not judged to be any individual significant adverse effects; however when cumulative effects are considered the significance of adverse effects increases, as detailed below.				
Potential Cumulative and Synergistic Effects: potential for cumulative adverse effects from the development in housing, economy and tourism on road congestion/car use, greenhouse gas emissions and waste generation. Increasing the number of households living in rural areas, the productivity and number of rural businesses and the attractiveness of the tourism offer, will likely give rise to increased traffic movements and volume of waste generated in the area, which will both contribute to rising greenhouse gas emissions. Potential for significant beneficial effects on the vibrancy and vitality of rural communities through the cumulative and synergistic effects arising from the provision of affordable housing, support and improvement of local facilities, access improvements and strong support for the rural economy.				
Mitigation: consider: <ul style="list-style-type: none"> • Adding health facilities to point b) • Making reference to cultural assets possibly in point l) and/or b) • How improved access arrangement will directly improve health inequalities and promote social inclusion 				
Monitoring Proposals: <ul style="list-style-type: none"> • Number of new affordable homes delivered in rural area • % appeals successfully defended on design terms 	<ul style="list-style-type: none"> • Mode of travel to work • Greenhouse gas emissions • % waste recycled • % and tonnage waste collected • Village Action Plans 		<ul style="list-style-type: none"> • Farm diversification • Access to services and facilities • Loss or net gain employment space • Loss of ancient woodland • BAP species present 	

Strategy for Communities				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	✓	✓	✓	The strategy makes several references to housing and has a strong focus on improving the range, quantity and affordability of housing. This includes making provision for affordable housing to address local need and also providing it within the community, easier access to housing for younger people, greater emphasis on small, cheaper housing, bringing forward a range of suitable housing and positively meeting responsibilities in terms of appropriate provision for Gypsies and Travellers.
To improve the health and well-being of the population and reduce inequalities in health	✓	✓	✓	The provision of suitable housing to meet all types of local need should have beneficial effects for health and well-being. The strategy also makes clear the need to promote healthy lifestyles through improved provision of accessible, health and community facilities and high quality recreation space.
To reduce crime and the fear of crime	✓	✓	✓	The strategy promotes working with partner authorities to address issues of crime and disorder, and designing out crime in areas of new development.

To reduce deprivation and social exclusion	(✓)	(✓)	(✓)	The strategy is indirectly addressing deprivation and social exclusion through the provision of suitable affordable housing, promoting participatory communities with provision of community facilities and addressing health inequalities in terms of access to health care; however there is no economic component to this strategy. Specific reference to addressing needs of older people shows support for this section of the community.
To raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	There are some known links between improved housing arrangements and improved educational achievement; but the strategy does not have a strong educational focus.
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	~	~	Other than providing suitable accommodation to help retain the workforce and encourage younger people to stay in living in the area, the strategy does not focus on employment issues.
To improve accessibility to services and facilities for all ages across the District	~	~	~	Other than access to housing and recreational opportunities the strategy doesn't address access to a wide range of services and facilities.
To encourage and facilitate increased engagement in cultural and leisure activities	(✓)	(✓)	(✓)	The strategy in part addresses leisure through the promotion of increased recreational opportunities, but does not encourage increased engagement in cultural activities.
To improve efficiency in land use and encourage the prudent use of natural resources	(✓)	(✓)	(✓)	The strategy makes reference to effective use of land and dwellings although there is no quantifying of the amount to be delivered, where, how or when development would be delivered; this will covered by other policy areas.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	~	~	The strategy in itself does not impact on road congestion and pollution levels – other policy areas concerned with the delivery of a quantum of development would affect this SA Objective more.
To reduce emissions of Greenhouse gases	~	~	~	Effects judged to be neutral though the implication of this strategy is to improve housing by providing more, small, cheaper housing, which could increase the overall number of households in the District and could therefore have adverse effects in trying to reduce greenhouse gas emissions.

To minimise the risk of flooding and resulting detriment to people and property	~	~	~	Other policy areas will guide development to areas of lowest flood risk.
To maintain, improve and manage water resources in a sustainable way	~	~	~	Other cross-cutting policy on sustainable water management should ensure development has consideration to the sustainable management of water through design of new development; increasing the amount of development in the rural area will require additional water to be supplied to the area.
To conserve and enhance biodiversity	~	~	~	Other cross-cutting policy should help protect biodiversity.
To protect and enhance the high quality natural and built environment	~	~	~	Other policy on the spatial distribution and cross-cutting policy on design should protect and help enhance the high quality built and natural environment.
To reduce waste generation and disposal, and achieve the sustainable management of waste	~	~	~	New development is likely to generate waste through construction and operation and sustainable waste management should be implemented. Other cross-cutting policy on sustainable resource management should ensure sustainable management of waste in operation and construction.
Conformity with other policy/initiatives: The South East Plan; ODPM Circular 01/2006 Planning for Gypsy and Traveller Sites; PPS3 Housing				
Summary of Significant Effects: significant beneficial effects are predicted for the SA Objectives on housing, health and crime reduction. The strategy makes clear the need to promote healthy lifestyles and participatory communities through improved provision of accessible, high quality recreation space, health and community facilities. The strategy also addresses health inequalities through promoting the importance of ease of access to health facilities. Housing is a strong theme within this strategy and provision in terms of affordability, type and mix are identified and should result in improved access to appropriate, decent housing. Crime reduction is specifically addressed in terms of working with partner authorities; there are also important links with designing out crime that can work in conjunction with other projects and schemes.				
Potential Cumulative and Synergistic Effects: potential for improved health statistics and possible reduction in health benefits claimants due to improved access to health facilities and improved housing arrangements in terms of affordability and physical requirements in terms of space, number of bedrooms and utility arrangements. Cumulative effects should also result in a reduction in the number of people on the housing needs register.				
Mitigation: consider:				

<ul style="list-style-type: none"> • Including cultural facilities • Whether strategy can further address social exclusion, although certain sections of community have been addressed ie; the elderly 		
Monitoring Proposals: <ul style="list-style-type: none"> • Access to open space and leisure • Access to doctors surgeries • Households in fuel poverty • Number of new homes built to lifetimes homes standard 	<ul style="list-style-type: none"> • Burglary from dwellings • Vehicle crime • Violent crime • Life expectancy • % residents who feel fairly or very safe 	<ul style="list-style-type: none"> • Number of housing completions • % affordable houses built annually • Number of households on housing register • Total homeless in priority need

Strategy for Sustainable Economic Development				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	~	~	~	The strategy doesn't deal with housing issues.
To improve the health and well-being of the population and reduce inequalities in health	~	~	~	Better employment and economic opportunities can help to underpin improved health and well-being, particularly those can offer the workforce the opportunity to up-skill – though judged to be less direct impact than housing that meets needs and access to appropriate healthcare, leisure and recreation.
To reduce crime and the fear of crime	~	~	~	
To reduce deprivation and social exclusion	✓	✓	✓	Improved employment opportunities and particularly those that offer training elements and opportunities to up-skill should help reduce deprivation. There is no particular mention of the rural economy.

To raise educational achievement levels and develop the opportunities for lifelong learning	✓	✓	✓	The strategy requires action in increasing workforce skills through education and training.
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	✓	✓	✓	Many aspects of the economy and workforce are addressed through this strategy with the provision of suitable land and premises including new strategic sites, and the encouragement of inward investment. The strategy could be strengthened to include the rural economies of the District and how they will be supported.
To improve accessibility to services and facilities for all ages across the District	~	~	~	Improving access to employment is clearly addressed through this strategy; other areas of accessibility are not found within this strategy.
To encourage and facilitate increased engagement in cultural and leisure activities	?	?	?	It is not within the remit of this strategy to address cultural and leisure activities, although supporting the role of tourism may have an indirect positive impact on leisure facilities.
To improve efficiency in land use and encourage the prudent use of natural resources	?	?	?	It is clear from the strategy that there will be land provided for employment growth but it is not clear at this stage how land and buildings may be used efficiently.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(X)	(X)	X	It is not thought that the strategy would contribute to reducing congestion or air pollution. The encouragement of new enterprise and business into the District is likely to put more pressure on the road transport system and increase traffic movements within the District. Certain aspects of the strategy have some mitigating qualities: the promotion of sustainable tourism; the commensurate provision of business sites and premises to match workforce growth to reduce reliance on out-commuting. Therefore the effects have been judged as minor adverse with potential to become significant over time.
To reduce emissions of Greenhouse gases	(X)	(X)	X	An increase in economic activity in the District, new employment land and new and growing businesses in the District will not reduce greenhouse gas emissions.
To minimise the risk of flooding and	?	?	?	The location of new employment land is not identified within this

resulting detriment to people and property				strategy. Employment uses are considered to be less vulnerable than residential uses in flood risk terms.
To maintain, improve and manage water resources in a sustainable way	~	~	~	Other cross-cutting policy on sustainable water management should ensure development has consideration to the sustainable management of water through design of new development; increasing the amount of development in the rural area will require additional water to be supplied to the area.
To conserve and enhance biodiversity	?	?	?	Other cross-cutting policy should help protect biodiversity.
To protect and enhance the high quality natural and built environment	?	?	?	The appearance of business/industrial parks and employment sites can often jar with the surrounding landscape and great care should be taken in the siting of new employment areas. Other cross-cutting policy on design should protect and help enhance the high quality built and natural environment.
To reduce waste generation and disposal, and achieve the sustainable management of waste	(X)	(X)	(X)	The push for economic uplift evident within this strategy should result in growth in the number and size of businesses operating within the District, which will inevitably increase waste generation. Other cross-cutting policy on sustainable resource management should ensure sustainable management of waste in operation and construction.
Conformity with other policy/initiatives: The South East Plan; Consultation Paper on a new PPS 4: Planning for Sustainable Economic Development; Regional Economic Strategy				
Summary of Significant Effects: significant beneficial effects would be expected for the SA Objectives to improve educational attainment and life-long learning, reduce deprivation and sustain economic growth. The poor state of the economy and the relatively poor business accommodation in the District requires that additional provision in employment space is made and the strategy delivers this paying particular attention to workforce growth to ensure workforce growth is matched by employment growth. The strategy also considers the need to have a ready supply of new land premises available.				
Potential Cumulative and Synergistic Effects: potential for cumulative adverse effects that result in increased traffic movements with an increase in traffic congestion, air pollution and emissions of greenhouse gases. Potential for increased greenhouse gas emissions from more businesses operating and growing their interests in the District, through their requirements for heating, transport and waste generation. In terms of beneficial cumulative effects these will mainly focused on achieving economic growth and uplift for the District and reducing deprivation. Further beneficial cumulative effects should result in higher skills levels of District residents.				

Mitigation: Consider: <ul style="list-style-type: none"> • Adding reference to the rural economy, including land-based industries and agriculture • Stating how best use will be made of existing employment land and premises, increasing efficiency of employment sites, diversification of uses to retain functioning business space 		
Monitoring Proposals: <ul style="list-style-type: none"> • % students 16+ in full time education • % population with no qualifications • % pupils achieving level 4 at Key Stage 2 	<ul style="list-style-type: none"> • % unemployed that are long-term unemployed • Unemployment as % of population • GVA per person • Tourism business turnover 	<ul style="list-style-type: none"> • Business start up and closures • Loss of employment land to residential • Industrial and business development commitments

Strategy for the Environment				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	~	~	~	This strategy does not deal with housing issues and there are not considered to be major environmental constraints to the overall house-building requirement for the District. There maybe some localised environmental constraints that could affect some issues of local need within the District. The Strategy for Environment should contribute to achieving sustainable construction of new homes and is beneficial in this aspect.
To improve the health and well-being of the population and reduce inequalities in health	(✓)	(✓)	(✓)	A person's environment can affect their well-being and in extreme circumstances their health. Protecting and enhancing our built and natural environments should have a beneficial effect for the well-being of the District's residents.
To reduce crime and the fear of crime	~	~	~	The design of development has an important role to play in

				ensuring new development does not exacerbate anti-social behaviour and criminal activity. High quality design is also taken to include 'secured by design' principles.
To reduce deprivation and social exclusion	~	~	~	The strategy does not directly address deprivation or social exclusion, however access to open space and a high quality environment can aide social inclusion.
To raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	This strategy does not directly impact educational attainment; however stewardship of the natural and built environment and promotion and enhancement of biodiversity can present educational opportunities for school pupils.
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	(✓)	(✓)	(✓)	The maintenance of the high quality built and natural environment can serve to sustain economic growth through the attractiveness (in quality of life terms) it offers to businesses as a place to operate from and within and also in terms of encouraging tourism, which contributes to the economy of the District.
To improve accessibility to services and facilities for all ages across the District	~	~	~	Other than in terms of access to the open space network the strategy doesn't deal with accessibility to services and facilities.
To encourage and facilitate increased engagement in cultural and leisure activities	(✓)	(✓)	(✓)	The District has a rich cultural landscape both natural and built. The preservation and enhancement of the various aspects of the environment: the historic architectural quality, the modern architectural quality, the historic landscape and the important nature conservation sites all serve to facilitate increased engagement in cultural and leisure activities.
To improve efficiency in land use and encourage the prudent use of natural resources	✓	✓	✓	The strategy for the environment makes clear the requirement for minimising the environmental impact of new development, which should ensure the prudent use of natural resources including land. The strategy also makes provision for the general protection and enhancement of natural resources through strategy points a), b) and f).
To reduce road congestion and pollution levels and ensure air quality continues to	~	~	~	The baseline shows that air quality is not currently a problem in the District; this strategy does not deal with road congestion or

improve by increasing travel choice and reducing car usage				car use. The strategy aims to ensure no worsening of air quality through new development.
To reduce emissions of Greenhouse gases	(✓)	✓	✓	The need to reduce greenhouse gas emissions is central to sustainable development and the strategy aims to minimise emissions in construction and operation of new development. This may be achieved through improved design of development to include better insulation and reduced heat loss and therefore reduces requirements for energy use. Additionally, and more so over time, this also includes the generation of energy from renewable sources so as to reduce the energy requirements from non-renewable, carbon emitting sources.
To minimise the risk of flooding and resulting detriment to people and property	✓	✓	✓	There is explicit reference in the strategy (f) to identifying and reducing flood risk to people and property and the SFRA will guide in this process.
To maintain, improve and manage water resources in a sustainable way	(✓)	✓	✓	As with energy requirements, the sustainable management of water is also fundamental in achieving sustainable development and the strategy sets the requirement to encourage provision of water supply and waste water infrastructure in an efficient and sustainable way. The SFRA will guide the potential for the implementation of SuDS under the environment strategy, which will help reduce surface run-off.
To conserve and enhance biodiversity	✓	✓	✓	Priority habitats have been promoted by the strategy for enhancement and protection and commitment to identifying a strategic greenspace network. The strategy could be strengthened by clarifying what constitutes priority habitats, i.e. does it include SNCIs?
To protect and enhance the high quality natural and built environment	✓	✓	✓	The strategy leads with the management of the high quality built and natural landscape character and seeks to place high quality design centrally in the planning process.
To reduce waste generation and disposal, and achieve the sustainable management of waste	(✓)	(✓)	(✓)	The requirement to minimise environmental impacts of development including minimising waste generation. Achieving sustainable development requires the consideration of waste

				issues and implementation of site waste management plans which monitor and set targets for waste in order to promote resource efficiency.
Conformity with other policy/initiatives: PPS9 Biodiversity and Geological Conservation; PPS23 Pollution and Planning Control; DCLG Code for Sustainable Homes; PPS25 Development and Flood Risk; A Historic Environment A Force for our Future (2001); PPS1 Creating Sustainable Communities; PPS10 Planning for Sustainable Waste Management				
Summary of Significant Effects: potential for significant beneficial effects on the prudent use of natural resources, reducing greenhouse gas emissions (particularly in the long term), minimising flood risk, sustainable water resource management, conservation of biodiversity, the high quality environment and achieving sustainable waste management. The strategy should achieve a high level of environmental stewardship encouraging the sensitive management of the environment with proper regard for the impacts of climate change.				
Potential Cumulative and Synergistic Effects: potential for significant reduction in greenhouse gas emissions; improvement in priority habitat sites				
Mitigation: consider: <ul style="list-style-type: none"> • Clarifying what counts as priority habitat • Including the protection of water resources 				
Monitoring Proposals: <ul style="list-style-type: none"> • % appeals successfully defended on design grounds • Condition of SSSIs • Loss of ancient woodland 		<ul style="list-style-type: none"> • Emissions of greenhouse gases • % new development with renewable energy generation • Total domestic water consumption • Development on brownfield land 		<ul style="list-style-type: none"> • Properties at risk from flooding • Planning permissions granted contrary to EA advice on flood grounds

Strategy for Transport and Accessibility				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	~	~	~	This strategy ensures that new housing would be delivered in sustainable locations where travel by sustainable modes of transport can be maximised.
To improve the health and well-being of the population and reduce inequalities in health	(✓)	(✓)	(✓)	By ensuring the development of safe pedestrian and cycle routes for access to jobs and facilities the strategy should encourage more active lifestyles for District residents.
To reduce crime and the fear of crime	(✓)	(✓)	(✓)	Ensuring new pedestrian and cycle routes are safe to use the strategy helps to reduce the fear of crime.
To reduce deprivation and social exclusion	(✓)	(✓)	(✓)	The strategy aims to promote social inclusion by prioritising accessibility by the public transport network and non-car modes of travel.
To raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	The strategy doesn't impact upon educational achievement.
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	(✓)	✓	✓	In improving access to jobs and improving the strategic transport infrastructure the strategy is supporting economic growth by facilitating access to jobs for the workforce and making the District more attractive to businesses. The strategy is also supporting the tourism economy with consequent prosperity improvements.
To improve accessibility to services and facilities for all ages across the District	✓	✓	✓	The whole focus of this strategy is to improve accessibility to services and facilities for all ages across the District; by prioritising improvements to the public transport network and the development of safe pedestrian and cycle routes the strategy is making transport inclusive for all.

To encourage and facilitate increased engagement in cultural and leisure activities	(✓)	(✓)	(✓)	The strategy is facilitating increased engagement in cultural and leisure activities by improving access generally within the District.
To improve efficiency in land use and encourage the prudent use of natural resources	(✓)	(✓)	(✓)	By prioritising strategic transport infrastructure in the regeneration of coastal towns, the strategy is helping to improve the efficiency of land use.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(✓)	(✓)	✓	The strategy is contributing to increasing travel choice by non-car modes and aims to reduce road congestion by improving the strategic transport infrastructure within the District. The effects improve over time as the improvements come on stream. As congestion reduces air quality should improve. Strategies for managing car use should have positive impact on congestion but potential for overall increases in traffic due to improved road infrastructure and potential for increased business and tourism. Overall effects judged to be positive for this objective.
To reduce emissions of Greenhouse gases	(✓)	(✓)	(✓)	The strategy should help reduce reliance on the car and reduce the dominance of the car for commuter trips to places of employment. With increasing use of non-car modes of travel the strategy should help to reduce greenhouse gas emissions.
To minimise the risk of flooding and resulting detriment to people and property	~	~	~	The strategy does not deal with this issue.
To maintain, improve and manage water resources in a sustainable way	~	~	~	Other policy areas will ensure SuDS are implemented where necessary in the construction of new transport infrastructure.
To conserve and enhance biodiversity	~	~	~	Other policy areas will ensure habitat mitigation measures are sought for any significant losses that might be encountered in the construction of strategic transport infrastructure. Potential for adverse affects.
To protect and enhance the high quality natural and built environment	(✓)	(✓)	(✓)	By prioritising rail improvements where these can meet the objectives of strategic transport infrastructure and prioritising pedestrian, cycle and public transport infrastructure within urban areas the strategy should help protect the high quality built and natural environments. Potential for some localised adverse

To reduce waste generation and disposal, and achieve the sustainable management of waste	~	~	~	effects where new road infrastructure is proposed. Other policy areas should help ensure construction waste from any strategic transport improvements is minimised.
Conformity with other policy/initiatives:				
Summary of Significant Effects: the strategy has potentially significant beneficial effects for improving accessibility and connectivity within and to and from the District with longer term effects of reducing congestion between Bexhill and Hastings and within Bexhill. This should see significant beneficial effects for the economy of the District with improved access to employment, improved attractiveness for businesses to locate and grow in the District and encourage increased tourism by facilitating access to tourist attractions and facilities. The support of the public transport network and of safe pedestrian and cycle routes will improve accessibility and are likely to make a positive contribution to the health of the Districts residents. There is potential for adverse environmental effects with the construction of strategic transport infrastructure but other policy areas should ensure appropriate mitigation is delivered.				
Potential Cumulative and Synergistic Effects: potential for cumulative effects to result in increased prosperity within the District and reduced unemployment.				
Mitigation: other policy areas should deliver mitigation against adverse environmental effects; strategic transport infrastructure is lacking within the District and this is helping to limit the economic potential of the District, it is a goal in the South East Plan to regenerate the coastal towns and improve general prosperity within the District and therefore it is not considered appropriate to weaken the strategy focus on providing strategic transport improvements.				
Monitoring Proposals: <ul style="list-style-type: none"> • Access to bus services • % new housing within 30 minutes of key services • Mode of travel to work 	<ul style="list-style-type: none"> • Air quality • Major schemes completed in accordance with programmes • Major developments with travel plans 		<ul style="list-style-type: none"> • Commuting patterns in/out of the District • % PRow signposted and easy to use 	

Strategy for the Delivery of Development				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	(✓)	(✓)	(✓)	The strategy is helping to ensure the delivery of housing and identifying contingencies to ensure continued delivery in the event of a deficit arising in the delivery of new dwellings completions against the District housing trajectory. It also proposes to monitor progress of the Bexhill/Hastings link road and make any amendments to the timing or rate of development as necessary in accordance with the Overall Spatial Strategy.
To improve the health and well-being of the population and reduce inequalities in health	(✓)	(✓)	(✓)	The monitoring of the Core Strategy and the process for taking action, where necessary to rectify any significant failure, should help to ensure the continued improvement in the health and wellbeing of the population, through the delivery of suitable housing and in access to a range of key services and facilities including doctors surgeries, open space and leisure and recreation opportunities.
To reduce crime and the fear of crime	(✓)	(✓)	(✓)	The strategy proposes to monitor progress of (and take action to remedy where necessary) the Core Strategy against its objectives, one of which is to maintain low crime levels and the feeling of safety in the District.
To reduce deprivation and social exclusion	(✓)	(✓)	(✓)	The strategy proposes to monitor progress of (and take action to remedy where necessary) the Core Strategy against its objectives, one of which is to achieving economic regeneration and improved access to employment which should help address deprivation.
To raise educational achievement levels and develop the opportunities for lifelong	(✓)	(✓)	(✓)	The strategy proposes to monitor progress of (and take action to remedy where necessary) the Core Strategy against its

learning				objectives, one of which is to improve the skills levels across the District.
To sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	(✓)	(✓)	(✓)	The strategy proposes to monitor progress of (and take action to remedy where necessary) the Core Strategy against its objectives, one of which is to expand the range of employment sites and premises and another is to provide for employment growth. . It also proposes to monitor progress of the Bexhill/Hastings link road and make any amendments to the timing or rate of development as necessary in accordance with the Overall Spatial Strategy.
To improve accessibility to services and facilities for all ages across the District	(✓)	(✓)	(✓)	The strategy proposes to monitor progress of (and take action to remedy where necessary) the Core Strategy against its objectives, one of which is to improve access to health, recreation and social services for all.
To encourage and facilitate increased engagement in cultural and leisure activities	(✓)	(✓)	(✓)	The strategy proposes to monitor progress of (and take action to remedy where necessary) the Core Strategy against its objectives, one of which is to encourage more active lifestyles, with more leisure and cultural opportunities.
To improve efficiency in land use and encourage the prudent use of natural resources	(✓)	(✓)	(✓)	The strategy proposes to monitor progress of (and take action to remedy where necessary) the Core Strategy against its objectives, one of which is to encourage the efficient use of resources including land, water and energy.
To reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(✓)	(✓)	(✓)	The strategy proposes to monitor progress of (and take action to remedy where necessary) the Core Strategy against its objectives, one of which is to increase potential for travel by sustainable modes.
To reduce emissions of Greenhouse gases	(✓)	(✓)	(✓)	The strategy proposes to monitor progress of (and take action to remedy where necessary) the Core Strategy against its objectives, one of which is minimise carbon emissions.
To minimise the risk of flooding and resulting detriment to people and property	(✓)	(✓)	(✓)	The strategy proposes to monitor progress of (and take action to remedy where necessary) the Core Strategy against its objectives, one of which is to protect communities from flooding

				and effectively manage the risk.
To maintain, improve and manage water resources in a sustainable way	(✓)	(✓)	(✓)	The strategy proposes to monitor progress of (and take action to remedy where necessary) the Core Strategy against its objectives, one of which is to encourage efficient use of water
To conserve and enhance biodiversity	(✓)	(✓)	(✓)	The strategy proposes to monitor progress of (and take action to remedy where necessary) the Core Strategy against its objectives, one of which is to conserve and enhance the ecological resources in the District.
To protect and enhance the high quality natural and built environment	(✓)	(✓)	(✓)	The strategy proposes to monitor progress of (and take action to remedy where necessary) the Core Strategy against its objectives, one of which is to place greater emphasis on design and another is to conserve and enhance the historic built environment.
To reduce waste generation and disposal, and achieve the sustainable management of waste	~	~	~	The Core Strategy doesn't have a specific objective for waste as these are set in the County Waste and Minerals Core Strategy.
Conformity with other policy/initiatives: PPS12 Local Development Frameworks				
Summary of Significant Effects: The strategy should ensure the delivery of the Core Strategy and help it meet its objectives for a more sustainable District.				
Potential Cumulative and Synergistic Effects: A more sustainable District across the range of Sustainability Objectives.				
Mitigation: No mitigation is proposed at this time.				
Monitoring Proposals: All Core Strategy Objectives' Indicators				