

SUSTAINABILITY APPRAISAL REPORT ADDENDUM



TO ACCOMPANY THE MAIN MODIFICATIONS TO THE
DEVELOPMENT AND SITE ALLOCATIONS (DASA) LOCAL PLAN

July 2019

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1. Introduction

- 1.1 The Rother District Development and Site Allocations (DaSA) Local Plan, once adopted, will allocate sites for particular uses as well as setting out more detailed policies for the effective management of development in relation to key issues. The DaSA Local Plan implements the development strategy and core policies set out in the adopted Core Strategy. Although it should be noted that the DaSA does not include housing allocations in designated Neighbourhood Areas.
- 1.2 The plan is at an advanced stage of preparation. The DaSA Local Plan (Proposed Submission version) underwent consultation from 26 October 2018, for a six week period, ending on 7 December 2018 and was accompanied by a Sustainability Appraisal (SA) Report (the Regulation 19 consultation). The Proposed Submission version of the DaSA Local Plan and its accompanying SA was submitted to the Planning Inspectorate for independent examination on 18 January 2019.
- 1.3 In addition in March 2019, the District Council submitted their initial responses to the representations¹ made at the Regulation 19 stage, making a small number of modifications for the Inspector's consideration.
- 1.4 The DaSA has since then been the focus of examination hearings which were undertaken in May 2019. Prior to the hearings, the Inspector issued a series of Matters, Issues and Questions (MIQ's) to be discussed during the hearings. Within the statements prepared by the District Council which responded to the MIQ's, some further modifications were presented for the Inspector's consideration. In addition, during the hearing sessions and in response to action points set by the Inspector, the District Council also put forward some further modifications. These modifications have been collated and set out in three separate schedules:
 - Main Modifications - *to resolve issues in order to make the Local Plan sound (in accordance with paragraph 182 of the National Planning Policy Framework 2012) and to ensure its legal compliance. This involves changes or insertions to policies or text that are essential to enable the Plan to be adopted.*
 - Additional Modifications - *which are of a more minor nature and do not materially affect the policies set out in the DaSA Local Plan. These would be mainly points of clarification to amend text for clearer explanation, including updated facts or make typographical or grammatical revisions which improve the readability of the Plan.*
 - Modifications to the Policies Map – *these may be Main or Additional Modifications and detail changes to the Policies Map which are different to those set out when the Proposed Submission DaSA was submitted for examination.*

¹ <http://www.rother.gov.uk/CHttpHandler.ashx?id=31615&p=0>

- 1.5 The Modifications are scheduled to be published for consultation in late July 2019.

2. This SA Report Addendum

- 2.1 The DaSA Local Plan has been developed alongside a process of Sustainability Appraisal (SA), it is a legally required process that aims to ensure that the significant effects of an emerging draft plan (and alternatives) are systematically considered and communicated. It is a requirement that SA is undertaken in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations (the 'SEA Regulations') 2004.
- 2.2 The aim of this SA Report Addendum is essentially to present information on the modifications compared to the Proposed Submission DaSA Local Plan Policies, with a view to informing the current consultation and subsequent plan finalisation.
- 2.3 In order to achieve this aim, this SA Report Addendum sets out the SA findings in relation to the Main Modifications proposed alongside the Local Plan since submission. Previous versions of the SA Report accompanying the differing stages of the DaSA Local Plans production (November 2016 and September 2018) can be found on the Council's website² alongside the SA Scoping Report (August 2016).
- 2.4 In addition, it should be noted that in Appendix 2, some minor changes to the SA scoring of site options relating to North Bexhill and Fairlight are set out. These are made in response to the representations received to the SA which was published alongside the Proposed Submission DaSA Local Plan. These minor amendments were set out in the Council's Initial Responses to Representations³. However, they are included within Appendix 2 of this SA for completeness.

N.B. This report is known as an SA Report 'Addendum' on the basis that it is an Addendum to the SA Report published/submitted in 2018. Whilst the focus of this report is on proposed modifications, there is a need to bear in mind that the proposed modifications will (if taken forward) be implemented alongside the rest of the Local Plan, i.e. that part which is not set to be modified. For this reason, explicit consideration is also given to the effects of the Local Plan as modified (i.e. the cumulative effects of the proposed modifications and the rest of the Local Plan as submitted).

² <http://www.rother.gov.uk/SA>

³ RDC-DaSA-004 – 6 March 2019 <http://www.rother.gov.uk/CHttpHandler.ashx?id=31615&p=0>

3. Scope of the SA

The SA Framework

- 3.1 The production of an SA Framework is a key element of the SA process. The SA Framework provides a methodological framework for the appraisal of likely significant effects on the baseline. The scope of SA work, with respect to the DaSA Local Plan, has been used through this iterative SA process. Essentially, the scope is reflected in a list of sustainability objectives, which collectively provide a methodological 'framework' for appraisal. The SA objectives are listed below in Table 1. It has not been necessary to update the SA framework for the purposes of this appraisal.

Table 1: SA Framework for Development and Site Allocations Plan

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

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

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

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

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

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

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

3.2 The DaSA SA Framework visible in Table 3 built upon the Core Strategy SA framework, and has been tailored specifically for the DaSA. It was published alongside the DaSA Sustainability Appraisal Scoping Report (August 2016).

3.3 A series of decision-aiding questions has been devised for each SA Objective in order to facilitate the appraisal process. Each question will be assessed in order to identify:

- Whether the principal impacts of the Option are positive or negative (clearly some may support one objective while conflicting with another, although this does not mean the impacts cancel one another out);
- How these impacts may change over time (this cannot always be determined);
- The relative magnitude of the impacts.

4. The DaSA Local Plan-making/SA process to date

4.1 The DaSA Local Plan-making/SA process has been ongoing for a number of years, as explained within the earlier iterations of the SA Report (2018). At the current time, rather than revisit the whole process to date there is a need to explain the SA work undertaken subsequent to the examination hearings, which led to the development of proposed modifications.

5. Appraising the Main Modifications

Methodology

- 5.1 The focus of this appraisal is on the proposed modifications (given that it is the Main Modifications that are the focus of consultation); however, explicit consideration is also given to the effects of the Local Plan as modified (i.e. the cumulative effects of the proposed modifications and the rest of the Local Plan as submitted).
- 5.2 It should be noted that these Main Modifications considered in this SA Report Addendum are those which have been introduced subsequent to submission of the Local Plan.
- 5.3 This appraisal identifies and evaluates 'likely significant effects' of certain proposed modifications on the baseline, drawing on the sustainability topics/objectives identified through scoping (see Table 1) as a methodological framework.
- 5.4 It is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations. So, for example, account is taken of the probability, duration, frequency and reversibility of effects as appropriate. Cumulative effects are also considered, i.e. effects that become apparent once the effects of the DaSA Local Plan are considered in a wider context (i.e. recognising that it will not be implemented 'in a vacuum').

Screening of the modifications

5.5 Table 2 below summarises the Main Modifications and indicates which ones have been screened in for the purposes of SA. It also presents an overview of the rationale for the decision taken.

Table 2: Screening the Main Modifications for the purposes of SA

Main Mod #	Focus (changes in relation to...)	Screened in?	Rationale
MM1	Para 3.3 to supporting text and Policy DCO1 to Policy text. To ensure that Policy DCO1 is clear that it does not apply to shops in Town or District Centres, in accordance with other policies.	No	Comprises changes to the policy text to provide additional clarity. Does not constitute a change in the overall aim and focus of the policy.
MM2	Para 3.9 to supporting text. Additional supporting text to DCO1, relating to the interaction with Core Strategy Policy CO1 (iii) (a)	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
MM3	Para 4.16 to supporting text. Amendment to the supporting text of Policy DHG2 to provide clarity as to the locations where the policy applies.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
MM4	Policy DHG12 to Policy text. Additional criterion added to Policy DHG12 regarding the management of rainwater run-off.	Yes	Comprises changes to the policy text which provides additional policy criterion to manage rainwater run-off.
MM5	Policy DEC2 to Policy text. Amendment to criterion (ii) of Policy DEC2.	No	Comprises changes to the policy text to provide additional clarity. Does not constitute a change in the overall aim and focus of the policy.
MM6	Policy DEN3 to Policy text. Rephrasing of Policy DEN3 in line with the NPPF.	Yes	Comprises changes to the policy text which rephrases the policy to be positively worded in line with the NPPF, linking the policy to its overall objectives.
MM7	Figure 7 to Detail Map. Amend the Figure 7 to accord with paragraph 6.21.	Yes	Corrects a cartographical error to the policy map to make it consistent with the supporting text within the chapter.
MM8	Para 6.43 to supporting text. Amendment to paragraph 6.43 to accord more closely with the PPG as to where ecological surveys and reports are required.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
MM9	Paras 9.43, 9.46 and 9.48 to supporting text and Policy BEX3 to Policy text. Amendment to replace the term 'playing pitches/fields', with the term 'outdoor sports facilities' in wording of Policy BEX3 and its supporting text.	No	Comprises changes to the policy text to provide additional clarity. Does not constitute a change in the overall aim and focus of the policy.
MM10	Policy BEX3a to Policy text, Figure 21 to Detail Map and Policies Map Inset Map 1b. Amendment to replace the term 'playing pitches/fields', with the term 'outdoor sports facilities' in wording of Policy BEX3a and its supporting text.	No	Comprises changes to the policy text to provide additional clarity. Does not constitute a change in the overall aim and focus of the policy.

MM11	Policy BEX3b to Policy text. Amendment to replace the term 'playing pitches/ fields', with the term 'outdoor sports facilities' in wording of Policy BEX3b.	No	Comprises changes to the policy text to provide additional clarity. Does not constitute a change in the overall aim and focus of the policy.
MM12	Policy BEX3b to Policy text. Amendment to the text of criterion iii) (b) of Policy BEX3b so that requirements for traffic management are consistent between sites for BEX3b and BEX3c.	Yes	Comprises changes to the policy text which provides additional policy criterion to highlight an upgrade to existing infrastructure is required.
MM13	Para 9.60-9.61 to supporting text and Policy BEX4 to Policy text. Additional requirement in Policy BEX4 to upgrade the local sewerage system prior to occupation of the new development.	Yes	Comprises changes to the policy text which provides additional policy criterion to ensure traffic management measures are introduced to calm traffic.
MM14	Policy BEX6 to Policy text. To include the requirement for an Appropriate Assessment at planning application stage.	Yes	Comprises changes to the policy text which provides additional policy criterion to include the requirement for an Appropriate Assessment at the planning application stage.
MM15	Para 9.81 to supporting text and Policy BEX7 to Policy text. To include the policy requirement for two stages of SuDS and an Appropriate Assessment at planning application stage.	Yes	Comprises changes to the policy text which provides additional policy criterion to require two stages of SuDS and the requirement for an Appropriate Assessment at the planning application stage.
MM16	Para 9.122 to supporting text and Policy BEX10 to Policy text. Additional requirement to policy and supporting text to require a Travel Plan intended to promote the use of cycling, walking and other sustainable transport modes in compliance with Core Strategy Policy TR3 and the NPPF.	Yes	Comprises changes to the policy text which provides additional policy criterion to require a travel plan and promote sustainable transport modes.
MM17	Para 9.162 to supporting text and Policy BEX14 to Policy text. Amendment to the wording of the policy and supporting text to reflect that there are two culverts run through the site.	No	Comprises changes to the policy text to provide additional clarity. Does not constitute a change in the overall aim and focus of the policy.
MM18	Para 9.187 to supporting text and Policy BEX17 to Policy text. Amendment to the wording of policy BEX17 and supporting text replacing 'should be resisted' with 'not be supported', in relation to the further concentration of takeaway uses.	No	Comprises changes to the policy text to provide additional clarity. Does not constitute a change in the overall aim and focus of the policy.
MM19	Para 10.22 to supporting text and Policy HAS2 to Policy text. Additional text in policy HAS2 and its supporting text that requires proposals do not impact water quality in the adjacent Park Wood gills.	Yes	Comprises changes to the policy text which provides additional policy criterion to ensure surface water drainage proposals do not adversely impact on adjacent watercourses.

MM20	Para 10.22 to supporting text and Policy HAS3 to Policy text. Additional text in policy HAS3 and its supporting text to clarify that the proposed allocation is within the High Weald AONB. A presentational error is also corrected.	No	Comprises changes to the policy text to provide additional clarity. Does not constitute a change in the overall aim and focus of the policy.
MM21	Para 11.45, Policy BRO2 to Policy text and Figure 45 to Detail Map. Amend Policy BRO2, its supporting text and the Detail Map regarding sewerage capacity arrangements and amendment to the site boundary to reflect a recent planning application delegated to approve.	Yes	Comprises changes to the policy text which provides additional policy criterion to highlight an upgrade to existing infrastructure is required. An amendment is also made to the Policies Map.
MM22	Para 11.67 to supporting text and Policy CAM1 to Policy text. Amendment to the wording of Policy CAM1 to ensure that development has no adverse effect on the integrity of the adjacent Natura 2000 Sites.	Yes	Comprises changes to the policy text which provides additional policy criterion to ensure no adverse impact on adjacent Natura 2000 sites.
MM23	Para 11.75 to supporting text and Policy CAM2 to Policy text. Amendment to the wording of Policy CAM2 and its supporting text to ensure that development has no adverse effect on the integrity of the adjacent Natura 2000 Sites.	Yes	Comprises changes to the policy text which provides additional policy criterion to ensure no adverse impact on adjacent Natura 2000 sites.
MM24	Para 11.99 to supporting text. Amendment to supporting text to Policy CAT1, detailing the requirement for a project level HRA to be provided, in order to demonstrate that proposals will not adversely affect the Pevensy Levels SAC.	Yes	Comprises changes to the policy text which provides additional policy criterion to include the requirement for an Appropriate Assessment at the planning application stage.
MM25	Para 11.120 to supporting text and Policy FAC2 to Policy text. Amendment to the wording of Policy FAC2 and its supporting text to ensure clarity regarding what is required in terms of the provision of a serviced plot for a doctor's surgery as part of any proposed scheme.	Yes	Comprises changes to the policy text which revises the policy criterion relating to a serviced plot for a doctor's surgery.
MM26	Figure 50 to Detail Map and Policies Map Inset Map 9. Amendment to Detail Map supporting Policy FAC2 and the Policies Map to move the boundary of the proposed access.	Yes	Comprises changes to the Policies Map to amend boundary of the site access to enable a safe access to be achieved.
MM27	Paras 11.197 and 11.200 to supporting text and Policy RHA1 to Policy text. Additional criterion added to Policy RHA1 and its supporting text regarding on the adjacent Natura 2000 Sites.	Yes	Comprises changes to the policy text which provides additional policy criterion to ensure no adverse impact on adjacent Natura 2000 sites.
MM28	Para 11.205 and Policy RHA2 to Policy text. Additional criterion added to Policy RHA1 regarding on the adjacent Natura 2000 Sites, with additional supporting text.	Yes	Comprises changes to the policy text which provides additional policy criterion to ensure no adverse impact on adjacent Natura 2000 sites.
MM29	Policy RHA2 to Policy text. An additional criterion is added to require an appropriate drainage scheme with any submitted planning application.	Yes	Comprises changes to the policy text which provides additional policy criterion to ensure appropriate drainage scheme is achieved.

MM30	Paras 11.236-11.239 to supporting text, Policy WES4 to Policy text, Figure 60 to Detail Map and Policies Map Inset Map 14. Deletion of Policy WES4 and consequential changes.	Yes	The change results in the removal of this policy is its entirety and should be considered in terms of its impact.
MM31	Table of Contents, Para 1.4 and Appendix 1. Appendix 1 amended to include a list of Core Strategy policies which have been superseded by their respective DaSA policies.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
MM32	Appendix 2. Appendix 2 amended to include list of superseded Neighbourhood Plan policies.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.

5.6 Table 3 below summarises the Changes to the Policies Map and indicates which ones have been screened in for the purposes of SA. It also presents an overview of the rationale for the decision taken.

Table 3: Screening the Changes to the Policies Map for the purposes of SA

Main Mod #	Focus (changes in relation to...)	Screened in?	Rationale
PMM1	Policies Map Inset Map 1b: Bexhill North. Amendment to Bexhill North to include NBAR.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
PMM2	Policies Map Inset Map 1b: Bexhill North. Amendment to replace the legend entry 'playing pitches/fields', with the term 'outdoor sports facilities' in line with MM9-MM11 above	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
PMM3	Policies Map Inset Map 6: Broad Oak. Amendment to the site boundary to reflect a recent planning application, in line with MM21 above.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
PMM4	Policies Map Inset Map 9: Fairlight Cove. Amendment to correct a cartographical error, making it consistent with the supporting text, in line with MM7 above.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
PMM5	Policies Map Inset Map 9: Fairlight Cove. Amendment to the site boundary to ensure adequate site access, in line with MM26 above.	Yes	The change results in the amendment of the boundary of the site access to enable a safe access to be achieved.
PMM6	Policies Map Inset Map 14: Westfield. Amendment to Policy WES4 in line with MM30 above.	Yes	The change results in the removal of this policy is its entirety and should be considered in terms of its impact.

5.7 Table 4 below summarises the Additional Modifications and indicates which ones have been screened in for the purposes of SA. It also presents an overview of the rationale for the decision taken.

Table 4: Screening the Additional Modifications for the purposes of SA

AM #	Focus (changes in relation to...)	Screened in?	Rationale
AM1	Amendment to ensure it is clear that the villages also have development boundaries as well as site allocations.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM2	Amendment to correct a typographical error by adding Catsfield to the list of 'Villages with site allocations'.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM3	Amendment to add page numbers to the lists of Development Policies, Site Allocation Policies and Policies Map Inset Maps to improve usability of document.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM4	Amendment to correct a typographical error for the policy number of 'Land south of The Paddock/ Goddens Gill, Northiam'.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM5	Amendment to correct a styling and layout error for the Rye Harbour sub-heading.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM6	Amendment to include reference to the safeguarding of minerals sites, wharves and railheads to ensure the introduction provides all key information	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM7	Amendment to reflect the latest statement of Government policy.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM8	Amendment to correct a styling error.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM9	Amendment to include updated supporting text from Policy LHN2 of the Core Strategy for clarity.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM10	Amendment to include updated notes from Policy LHN2 of the Core Strategy for clarity.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM11	Amendment to correct a typographical error.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM12	Amendment to correct a typographical error.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM13	Amendment to correct a typographical error.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM14	Amendment to correct a typographical error.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM15	Amendment to correct a typographical error.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM16	Amendment to properly reflect the restrictions of Highways England.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM17	Amendment to reflect the normal expectation of accordance with other policies.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM18	Amendment to improve readability.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.

AM19	Amendment to correct a typographical error.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM20	Amendment to correct and erroneous reference to East Sussex County Council.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM21	Amendment to include new sub-heading and paragraph in relation to information on Priority Habitats/Species and Habitats/Species of Principal Importance.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM22	Amendment to improve readability and clarity of the wording.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM23	Amendment to make clear that SuDS can be successfully incorporated into several developments and 'linked' to provide greater benefits.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM24	Amendment to clarify that Highways England also have requirements that will need to be met.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM25	Amendment to update to the correct reference in the 2019 NPPF.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM26	Amendment to ensure the correct terminology is used in line with the NPPF.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM27	Amendment to ensure the correct terminology is used in line with the NPPF.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM28	Amendment to ensure the correct terminology is used in line with the NPPF.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM29	Amendment to clarify any ambiguity between the operation of Policy DEN2, DEN3 and DIM2.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM30	Amendment to clarify that the term 'Plans' is in reference to Neighbourhood Plans specifically.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM31	Amendment to correct a typographical error.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM32	Amendment to correct a typographical error.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM33	Amendment to update to the correct reference in the 2019 NPPF.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM34	Amendment to ensure the supporting text accords with criterion (v) of BEX1 and the Detail Map (Figure 15).	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM35	Amendment to accord with the acceptance of temporary solutions that was determined at the outline planning permission stage (RR/2017/2181/P).	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM36	Cartographical amendment to include NBAR for completeness.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM37	Amendment to provide additional clarity to criterion (iv) of Policy BEX2 and the Detail	No	The change provides additional clarity, and does not impact on

	Map (Figure 20) in terms of the ancient woodland buffer that is required.		the overall Local Plan strategy.
AM38	Amendment to improve clarity by stating that the development should consider the cumulative highway impacts of other proposals in line with Policy TR3.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM39	Amendment to correct a typographical error.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM40	Cartographical amendment to include NBAR for completeness.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM41	Policy amendment to clarify that this buffer is required to protect the ancient woodland.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM42	Cartographical amendment to include NBAR for completeness.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM43	Amendment to clarify how and where the uses can be accommodated on the site in terms of overall layout.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM44	Amendment to clarify how and where the uses can be accommodated on the site in terms of overall layout.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM45	Amendment to improve accuracy and clarity.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM46	Amendment to remove unnecessary reference to the potential future redevelopment of the Cemetery Lodge Site.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM47	Amendment to improve clarity by stating that the development should consider the cumulative highway impacts of other proposals in line with Policy TR3.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM48	Policy amendment to correct a typographical error.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM49	Amendment to improve clarity by stating that the development should consider the cumulative highway impacts of other proposals in line with Policy TR3.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM50	Amendment to correct a typographical error.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM51	Amendment to improve clarity by stating that the development should consider the cumulative highway impacts of other proposals in line with Policy TR3.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM52	Policy amendment to correct a typographical error.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM53	Amendment to correct a layout error between paragraphs.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM54	Amendment to correct a typographical error.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM55	Amendment to improve clarity by stating	No	The change provides additional

	that the development should consider the cumulative highway impacts of other proposals in line with Policy TR3.		clarity, and does not impact on the overall Local Plan strategy.
AM56	Amendment to improve clarity by stating that the development should consider the cumulative highway impacts of other proposals in line with Policy TR3.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM57	Policy amendment to clarify that the floorspace figure is a net figure.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM58	Amendment to correct a typographical error.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM59	Cartographical amendment to include NBAR for completeness.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM60	Amendment to ensure the correct terminology is used, ie referencing Waste Management rather than Waste Disposal.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM61	Amendment to the opening text of the Hastings Fringes chapter, to ensure that the ESCC Walking and Cycling Strategy is referred to.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM62	Amendment to correct a typographical error.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM63	Amendment to correct a typographical error.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM64	Amendment to supporting text to reinforce the need to retain the provision for an accessible path to the beach.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM65	Amendment to the supporting text so that it accords with planning application RR/2017/457/P.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM66	Policy amendment to correct a typographical error.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM67	Policy amendment to correct a typographical error.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM68	Amendment to correct a typographical error.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM69	Amendment to correct the alignment of a public right of way.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM70	Amendment to correct a typographical error.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM71	Amendment to correct a typographical error.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM72	Amendment to make clear that LP2006 Policy EM13 and Policy Inset Map 2A still apply in Battle until superseded by a made Neighbourhood Plan.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.
AM73	Amendment to correct a typographical error.	No	The change provides additional clarity, and does not impact on

			the overall Local Plan strategy.
AM74	Amendment to correct a typographical error.	No	The change provides additional clarity, and does not impact on the overall Local Plan strategy.

Detailed appraisal

- 5.8 Appendix 1 presents an appraisal of the Main Modifications which have been screened in as requiring closer examination through the SA process.

6. Next steps

Plan finalisation

- 6.1 Subsequent to the Modifications consultation the Inspector will consider all representations received, before deciding whether to report on the Local Plan's soundness (with modifications as necessary), or hold resumed examination hearings.
- 6.2 Assuming that the Inspector is ultimately able to find the DaSA Local Plan 'sound', it will then be adopted by Rother District Council. At the time of adoption an 'SA Statement' will be published that explains the process of plan-making/SA in full and presents 'measures decided concerning monitoring'.

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Appendix 1: Detailed Appraisals

Policy DHG12: Accesses and Drives (MM4)			
SA Objective		Score	Commentary
1	Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home.	~	
2	Improve the health and well-being of the population and reduce inequalities in health.	~	
3	Reduce crime and fear of crime.	~	
4	Reduce deprivation and social exclusion.	~	
5	Raise educational achievement levels and develop the opportunities for lifelong learning.	~	
6	Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities.	~	
7	Improve accessibility to services and facilities for all ages across the District.	~	
8	Encourage and facilitate increased engagement in cultural and leisure activities.	~	
9	Improve efficiency in land use and encourage the prudent use of natural resources.	~	
10	Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage.	(✓)	No likely effect on travel choice or reducing road travel, but the policy requires all proposals for new drives and accesses to be acceptable in terms of highway safety, including for pedestrians and cyclists.
11	Reduce emissions of Greenhouse gases.	~	
12	Minimise the risk of flooding and resulting detriment to people and property.	✓	The policy promotes permeable materials, or appropriate drainage to manage surface water run-off. Cross reference also made to Policy DEN5.
13	Maintain, improve and manage water resources in a sustainable way.	(✓)	The policy promotes permeable materials, or appropriate drainage to manage surface water run-off. Cross reference also made to Policy DEN5.
14	Conserve and enhance biodiversity.	~	
15	Protect and enhance the high quality natural and built environment.	(✓)	The policy requires all proposals to maintain the character of the locality, particularly in the rural areas,
16	Reduce waste generation and disposal, and achieve the sustainable management of waste.	~	
Potential Mitigation		The policy includes requirements that will mitigate potential harm to the environment, in particular in terms of ensuring highway safety and maintaining the character of the locality. It also sets out the expectations relating to permeable materials or drainage to manage surface water run-off.	
Cumulative and Synergistic Effects			
SA Conclusion		The policy as proposed to be modified has improved positive effects particularly in terms of minimising the risk of flooding (obj. 12) and maintaining, improving and managing water resources (obj.13). The modification provides clarity and cross-refers to Policy DEN5. This includes through stipulating consideration to permeable materials or appropriate drainage to manage surface water run-off.	

Policy DEN3: Strategic Gaps (MM6 & MM7)		
SA Objective	Score	Commentary
1 Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home.	—	The policy defines Strategic Gaps, within which development is carefully controlled. It sets out that development will only be permitted where it is unobtrusive and does not detract from the openness of the area, in line with the objectives of the Gap. This will limit house-building in the areas.
2 Improve the health and well-being of the population and reduce inequalities in health.	(✓)	The policy protects natural green space in close proximity to populous areas and in many cases there is public access to it, thereby facilitating recreation.
3 Reduce crime and fear of crime.	—	
4 Reduce deprivation and social exclusion.	—	
5 Raise educational achievement levels and develop the opportunities for lifelong learning.	—	
6 Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities.	—	By only permitting development where it is unobtrusive and does not detract from the openness of the area, in line with the objectives of the Gap, the policy has the potential to limit economic growth in the areas, although given their rural and undeveloped nature, outside of any development boundary, the effect is unlikely to be significant.
7 Improve accessibility to services and facilities for all ages across the District.	—	
8 Encourage and facilitate increased engagement in cultural and leisure activities.	—	
9 Improve efficiency in land use and encourage the prudent use of natural resources.	(✓)	By preventing inappropriate development within the strategic gaps, development is focused on other land in sustainable locations including land that has been previously developed.
10 Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage.	—	
11 Reduce emissions of Greenhouse gases.	—	
12 Minimise the risk of flooding and resulting detriment to people and property.	—	
13 Maintain, improve and manage water resources in a sustainable way.	—	
14 Conserve and enhance biodiversity.	(✓)	Protecting these areas from inappropriate development will support the protection of habitats.
15 Protect and enhance the high quality natural and built environment.	✓	Significant benefits to the natural environment by maintaining the identity and form of these undeveloped areas. The policy also supports the enhancement of the Gaps through effective landscape management.
16 Reduce waste generation and disposal, and achieve the sustainable management of waste.	—	
Potential Mitigation		
Cumulative and Synergistic Effects		
SA Conclusion	The modified policy provides clarity as to what development would be acceptable in the Strategic Gap. The policy is positively phrased and policy objectives are now an integral part of the policy wording. While there is a universal potential for strategic gaps to limit house building and economic development potential, the policy has an overall positive environmental effect. Strategic gaps offer significant benefits in terms of the built and natural environment, primarily in maintaining their openness, identity and form. There are also benefits in terms of well-being where there is some form of public access, and supporting existing biodiversity including where there are designated sites in and adjacent to the gaps. The protection of valued greenfield land also supports, to a degree, the prudent use of natural resources.	

BEXHILL POLICIES 3		Policy BEX3b: Land west of Watermill Lane (MM12)		Policy BEX4: Land at Former High School Site and Drills Hall, Down Road, Bexhill		Policy BEX6: Land adjacent to 276 Turkey Road, Bexhill (MM14)	
SA Objective		Score	Commentaries and Likely Significant Effects	Score	Commentaries and Likely Significant Effects	Score	Commentaries and Likely Significant Effects
1	Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home.	✓	Commentary on Economic Objectives (Primarily 1. 4. 5. 6. 9.) Will provide a significant quantum of housing, including affordable units, and family dwellings, a green corridor/amenity open space and footpath and cycle routes (Obj 1), in line with the respective policies. The development is in a sustainable location, close to Sidley District Centre which contains a number of key day to day local services (Obj 6 & 7). The site is greenfield but development in line with the policy will ensure efficient use of the site (Obj 9).	✓	Commentary on Economic Objectives (Primarily 1. 4. 5. 6. 9) Will provide a mixed use development, including housing (and affordable units) (Obj 1), in line the respective planning policies. The development is in a sustainable location, close to Bexhill town centre which contains a number of key day to day local services (Obj 6 & 7). The site is brownfield and, given its central location, is suitable for a high density development (Wet/dry leisure, hotel, commercial and housing), which will ensure efficient use of the site (Obj 9).	✓	Commentary on Economic Objectives (Primarily 1. 4. 5. 6. 9) Will provide a significant quantum of housing, including affordable units and larger family dwellings (Obj 1), in line the respective planning policies. The development is in a relatively sustainable location, close to existing schools (Obj 56 & 7). The site is greenfield but development in line with the policy will ensure efficient use of the site (Obj 9).
2	Improve the health and well-being of the population and reduce inequalities in health.	✓		✓		✓	
3	Reduce crime and fear of crime.	✓	Commentary on Social Objectives (Primarily 1. 2. 3. 4. 5. 7. 8. 10) This site offers a sustainable development opportunity, being within walking distance of Sidley District Centre, supported by the policy requirement for traffic management measures to be introduced onto Watermill Lane to calm traffic and ensure safe movement of pedestrians and cyclists, alongside new footpath and cycle routes to connect to existing development (Obj 2, 4, 6, 7, 8, 10). The site is close to the existing Public Right of Way network to provide access to the countryside and will provide additional links to the wider countryside. A green corridor/amenity open space will be provided, along with playing pitches as part of a recreation area in the adjacent site (Policy BEX3a) (Obj 2, 8). The scheme can provide affordable housing in line with Core Strategy policy (Obj 1 & 4).	✓	Commentary on Social Objectives (Primarily 1. 2. 3. 4. 5. 7. 8. 10) This site offers a sustainable development opportunity. The site is within walking distance of Bexhill town centre which contains shops, a GP, dental surgery , primary school and bus services (Obj 2, 4, 5, 7, 8, 10). The proposal will provide a leisure destination hub for a wet/dry leisure facility and associated complementary commercial development (Obj 8). The scheme also has scope to provide affordable housing in line with the respective Core Strategy policy (Obj 1 & 4). Wastewater capacity is limited and therefore an upgrade is required.	~	Commentary on Social Objectives (Primarily 1. 2. 3. 4. 5. 7. 8. 10) This site offers a sustainable development opportunity. The site is within walking distance of some local services, including local schools (Obj 5, 7 & 10). The scheme also has scope to provide affordable housing in line with Core Strategy policy (Obj 1 & 4).
4	Reduce deprivation and social exclusion.	✓		✓		✓	
5	Raise educational achievement levels and develop the opportunities for lifelong learning.	~	Commentary on Environmental Objectives (Primarily 9. 10. 11. 12. 13. 14. 15. 16) The site is located adjacent to ancient woodland, but any development would not encroach on this woodland. Additional woodland buffers would ensure the impact would be minimal (Obj. 9, 15). The valley floor itself provides not only a natural green space but also the opportunity for this to be enhanced both for biodiversity and as an amenity and recreational public access corridor. Existing woodlands should be retained with green links provided between them (Obj 9, 10, 13, 14, 15) . Access is be provided from Watermill Lane alongside traffic management measures to calm traffic, with specific regard to the short section north of Mayo Lane and to ensure the safe movement of pedestrians and cyclists between the site and Sidley, via Mayo Rise, in association with the provision of a new footway/cycleway and improvements (Obj. 10, 15).	✓	Commentary on Environmental Objectives (Primarily 9. 10. 11. 12. 13. 14. 15. 16) The site is known to partially suffer from surface water flooding and there is a culvert which runs through the site (Obj 12, 13). Redevelopment would need to ensure that it manages flood risk effectively. The appearance of the site should be improved by a high quality scheme.	✓	Commentary on Environmental Objectives (Primarily 9. 10. 11. 12. 13. 14. 15. 16) There is no existing access point for the site, but the most likely access point is at the south-west corner of the site onto Turkey Road (Obj 10). The site is partially contained from wider views but there are more localised filtered views. There is an existing Tree Preservation Order (TPO - no.312) along western and southern boundaries. As such, appropriate boundary planting will need to be incorporated as part of the development (Obj. 11, 15). The site is almost entirely free of flood risk, although located within the Pevensey Levels Hydrological Catchment, meaning two stages of SuDS are imperative(Obj 12 & 13). The site is located within the Pevensey Levels Hydrological Catchment requiring an Appropriate Assessment under Habitats Regulations (Obj 12 & 13).
6	Sustain economic growth and competitiveness and encourage innovation in higher value/lower impact activities.	✓		✗		✗	
7	Improve accessibility to services and facilities for all ages across the District.	✓	Potential Mitigation Redevelopment of this site may displace the existing Drill Hall facility which would need to be reprovided elsewhere, as per the policy requirements. Similarly, the redevelopment would result in the displacement of car/coach drop-off area for the adjacent school which would also require reprovision. A culvert runs through the site and will require an easement to be considered within development proposals. Wastewater capacity is limited and an upgrade of existing infrastructure is required.	✓	SA Conclusion This brownfield site brings forward a large scale redevelopment as a mixed use scheme as a leisure hub for the District, close to Bexhill town centre and the existing transport network. The scheme would also bring forward a good mix of housing, including affordable housing. The policy as proposed to be modified ensures that upgraded wastewater facilities are provided as it is recognised there is limited capacity.	✓	SA Conclusion Although a greenfield site, it is located within the existing development boundary for Bexhill, and the scheme would bring forward a good mix of housing, including affordable housing. The policy as proposed to be modified recognises that the site is located in the Pevensey Levels Hydrological Catchment and that an Appropriate Assessment with be required under the Habitats Regulations at the planning application stage, resulting in increased positive effects against Obj 12 & 13.
8	Encourage and facilitate increased engagement in cultural and leisure activities	✓		✓		~	
9	Improve efficiency in land use and encourage the prudent use of natural resources	✓	SA Conclusion This greenfield site is a sustainable development on the edge of Bexhill. The policy as proposed to be modified provides for a scheme which will bring forward a varied mix of housing, including affordable housing, a recreation area, a green corridor/amenity open space, appropriate traffic management measures, and footpath and cycle route, in association with the wider infrastructure requirements of Policy BEX3. The inclusion of traffic management measures results increased positive scoring against obj 10.	~	SA Conclusion This brownfield site brings forward a large scale redevelopment as a mixed use scheme as a leisure hub for the District, close to Bexhill town centre and the existing transport network. The scheme would also bring forward a good mix of housing, including affordable housing. The policy as proposed to be modified ensures that upgraded wastewater facilities are provided as it is recognised there is limited capacity.	~	SA Conclusion Although a greenfield site, it is located within the existing development boundary for Bexhill, and the scheme would bring forward a good mix of housing, including affordable housing. The policy as proposed to be modified recognises that the site is located in the Pevensey Levels Hydrological Catchment and that an Appropriate Assessment with be required under the Habitats Regulations at the planning application stage, resulting in increased positive effects against Obj 12 & 13.
10	Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage.	✓		~		~	
11	Reduce emissions of Greenhouse gases.	~	Potential Mitigation This site offers a sustainable development opportunity combined with a significant number of green space elements including new footpath and cycle routes to connect to existing development as well as the wider countryside, a green corridor/amenity open space, alongside the wider infrastructure requirements set out in Policy BEX3. Traffic management measures to calm traffic along the short section of Watermill Lane, north of Mayo Lane and to ensure the safe movement of pedestrians and cyclists between the site and Sidley, via Mayo Rise, in association with the provision of a new footway/cycleway and improvements will be required. Financial contributions will be required for off-site recreational/ open space provision.	~	SA Conclusion This greenfield site is a sustainable development on the edge of Bexhill. The policy as proposed to be modified provides for a scheme which will bring forward a varied mix of housing, including affordable housing, a recreation area, a green corridor/amenity open space, appropriate traffic management measures, and footpath and cycle route, in association with the wider infrastructure requirements of Policy BEX3. The inclusion of traffic management measures results increased positive scoring against obj 10.	✓	SA Conclusion Although a greenfield site, it is located within the existing development boundary for Bexhill, and the scheme would bring forward a good mix of housing, including affordable housing. The policy as proposed to be modified recognises that the site is located in the Pevensey Levels Hydrological Catchment and that an Appropriate Assessment with be required under the Habitats Regulations at the planning application stage, resulting in increased positive effects against Obj 12 & 13.
12	Minimise the risk of flooding and resulting detriment to people and property.	~		~		✓	
13	Maintain, improve and manage water resources in a sustainable way.	✓	SA Conclusion This greenfield site is a sustainable development on the edge of Bexhill. The policy as proposed to be modified provides for a scheme which will bring forward a varied mix of housing, including affordable housing, a recreation area, a green corridor/amenity open space, appropriate traffic management measures, and footpath and cycle route, in association with the wider infrastructure requirements of Policy BEX3. The inclusion of traffic management measures results increased positive scoring against obj 10.	~	SA Conclusion This brownfield site brings forward a large scale redevelopment as a mixed use scheme as a leisure hub for the District, close to Bexhill town centre and the existing transport network. The scheme would also bring forward a good mix of housing, including affordable housing. The policy as proposed to be modified ensures that upgraded wastewater facilities are provided as it is recognised there is limited capacity.	✓	SA Conclusion Although a greenfield site, it is located within the existing development boundary for Bexhill, and the scheme would bring forward a good mix of housing, including affordable housing. The policy as proposed to be modified recognises that the site is located in the Pevensey Levels Hydrological Catchment and that an Appropriate Assessment with be required under the Habitats Regulations at the planning application stage, resulting in increased positive effects against Obj 12 & 13.
14	Conserve and enhance biodiversity.	✓		~		~	
15	Protect and enhance the high quality natural and built environment.	✓	SA Conclusion This greenfield site is a sustainable development on the edge of Bexhill. The policy as proposed to be modified provides for a scheme which will bring forward a varied mix of housing, including affordable housing, a recreation area, a green corridor/amenity open space, appropriate traffic management measures, and footpath and cycle route, in association with the wider infrastructure requirements of Policy BEX3. The inclusion of traffic management measures results increased positive scoring against obj 10.	✓	SA Conclusion This brownfield site brings forward a large scale redevelopment as a mixed use scheme as a leisure hub for the District, close to Bexhill town centre and the existing transport network. The scheme would also bring forward a good mix of housing, including affordable housing. The policy as proposed to be modified ensures that upgraded wastewater facilities are provided as it is recognised there is limited capacity.	✓	SA Conclusion Although a greenfield site, it is located within the existing development boundary for Bexhill, and the scheme would bring forward a good mix of housing, including affordable housing. The policy as proposed to be modified recognises that the site is located in the Pevensey Levels Hydrological Catchment and that an Appropriate Assessment with be required under the Habitats Regulations at the planning application stage, resulting in increased positive effects against Obj 12 & 13.
16	Reduce waste generation and disposal, and achieve the sustainable management of waste.	~		✓		~	
Cumulative Effects		Bexhill is the District Centre of Rother (as defined in the Core Strategy) and clearly warrants retention of its development boundary. The preferred sites comprise of a mix of provision, including large scale mixed use extensions of the edge of Bexhill to smaller redevelopment and infill areas within the existing development boundary. There will need to be careful consideration of the cumulative impact upon both traffic congestion and the ability to access sites by foot, cycle and bus. Careful planning will be needed to maximise benefits beyond site scale, with wider than site-specific factors given full consideration. In combination, all the preferred sites make a significant contribution towards meeting the overall housing target for the District and meets the specific target for Bexhill. The preferred sites are considered to be appropriate in terms of scale and environmental impact (in natural and built environment terms) for their locations. They are in sustainable locations , reasonably close to shops, GPs bus services etc., which will benefit economically from the cumulative effects of developing sites, and there is an associated environmental and social benefit in reducing the need to travel. Landscape and biodiversity impacts are minimal as a result of the proposed developments and relevant policy criteria are included within the respective policies where mitigation from development is required. In all cases, careful consideration needs to be made to the individual and overall impact of development on the built environment and the wider landscape on those areas on the edge of Bexhill. Therefore it is concluded these preferred sites represent the most sustainable options to meet Bexhill's development targets.					

BEXHILL POLICIES 4		Policy BEX7: Land at Moleynes Mead, Fryatts Way, Bexhill (MM15)		Policy BEX10: Land at Northeys (Former UAE Technical Training Project), Bexhill (MM16)	
SA Objective		Score	Commentaries and Likely Significant Effects	Score	Commentaries and Likely Significant Effects
1	Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home.	(✓)	<p>Commentary on Economic Objectives (Primarily 1, 4, 5, 6, 9) Will provide a significant quantum of housing, including affordable units and family dwellings (Obj 1), in line the respective planning policies. The development is in a reasonably sustainable location (Obj 7). The site is predominantly greenfield but development in line with the policy will ensure efficient use of the site (Obj 9).</p> <p>Commentary on Social Objectives (Primarily 1, 2, 3, 4, 5, 7, 8, 10) The site is reasonably located in terms of access to services, there is also a bus route within walking distance of the site (Obj 7 & 10). It is likely that a footpath link to Ellerslie Lane would be required to encourage a more direct walking route. There is an existing access to Ellerslie Lane which would serve the existing dwelling on the site (Moleynes Mead). A new access will be required from Fryatts Way (Obj 10). The scheme can provide affordable housing in line with the respective Core Strategy policy (Obj 1 & 4).</p> <p>Commentary on Environmental Objectives (Primarily 9, 10, 11, 12, 13, 14, 15, 16) The site is located within the existing development boundary and is relatively well screened from the wider countryside by existing residential development on all four sides (although there are some gaps to the west).The site contains a number of mature trees and these contribute positively to the character of the area; any development should seek to retain them. The southern section of the site is separated from the wider site by an existing Tree Preservation Order and therefore this area is not considered appropriate as part of the developable area of the site. Additional tree planting would ensure the impact would be minimal. The site is occupied by an existing dwelling (Moleynes Mead) which although not listed, is considered to be an undesignated heritage asset. It is therefore considered that any redevelopment of the site which involved in demolition of Moleynes Mead would not be acceptable.(Obj 15). The site is almost entirely free of flood risk, although located within the Pevensy Levels Hydrological Catchment meaning two stages of SuDS are imperative (Obj 12 & 13). There are some protected species located on-site but the wildlife corridor can help mitigate the development's impact (Obj 14). The site is located within the Pevensy Levels Hydrological Catchment requiring an Appropriate Assessment under Habitats Regulations (Obj 12 & 13).</p> <p>Potential Mitigation As discussed, the inclusion of the wildlife corridor and SuDS have multiple environmental benefits that mitigate harm from the development and are necessary in accordance with the policy. Provision of a footpath link back to Ellerslie Lane to help encourage a more direct walking route and would help access bus services along this route. The site is located within the Pevensy Levels Hydrological Catchment requiring an Appropriate Assessment under Habitats Regulations.</p> <p>SA Conclusion Although a predominantly greenfield site and development is of a medium scale, the scheme would bring forward a good mix of housing, including affordable housing, as well as ecological enhancements in the form of a wildlife/ecology corridor on the southern part of the site. The policy as proposed to be modified recognises that the site is located in the Pevensy Levels Hydrological Catchment and that an Appropriate Assessment with be required under the Habitats Regulations at the planning application stage, resulting in increased positive effects against Obj 12 & 13.</p>	(✓)	<p>Commentary on Economic Objectives (Primarily 1, 4, 5, 6, 9) Will provide a significant quantum of housing, including affordable units and family dwellings (Obj 1). The site is part brownfield, part greenfield but development in line with the policy will ensure efficient use of the site (Obj. 9).</p> <p>Commentary on Social Objectives (Primarily 1, 2, 3, 4, 5, 7, 8, 10) Footpath links are proposed on the site to integrate with the surrounding footpath network (Obj 7). Whilst the site is not in close proximity to Little Common District Centre, it is a main route. Sustainable travel choices should be promoted given it's proximity from Little Common District Centre (Obj 7). It is a part brownfield site which could bring forward positive social infrastructure (playing pitches) in line with the policy requirements, in order to meet an identified shortfall through the Playing Pitch Strategy (Obj 2, 8). The site is also close to the existing Public Right of Way network to provide access to the countryside (Obj 8), with scope to reinstate an old PRoW through the site. The scheme also has scope to provide affordable housing in line with the respective Core Strategy policy (Obj 1 & 4).</p> <p>Commentary on Environmental Objectives (Primarily 9, 10, 11, 12, 13, 14, 15, 16) The site is visually exposed in the wider landscape from a number of public vantage points across the Pevensy Levels. The light colour of the buildings within the site appears as a stark contrast to the surrounding landscape The existing development appears as an alien feature in the wider landscape but given the brownfield nature of the main part of the site, gives rise to an opportunity to improve the built landscape in this area. A landscape-led masterplan would ensure that development is successfully integrated into the landscape and provide enhancements to the landscape and visual amenity of the area, in line with the policy requirements (Obj 14 & 15). The site is located within the Pevensy Levels Hydrological Catchment meaning two stages of SuDS are imperative (Obj 12 & 13). This area of Bexhill does suffer from some congestion but Highway Authority advice considers that there is sufficient capacity to accommodate development in this location (Obj 10). The site is also close to the existing Public Right of Way network to provide access to the countryside (Obj 8). No development should be provided within the Flood Zone 3 part of the site (Obj 12).</p> <p>Potential Mitigation Built development should be confined to the brownfield part of the site and the greenfield part should remain open and could provide playing pitches to meet the identified town-wide shortfall. SuDS have multiple environmental benefits that mitigate harm from the development and are necessary in accordance with the policy. The site is visually exposed in the wider landscape from a number of public vantage points across the Pevensy Levels, but redevelopment of existing development gives rise to an opportunity to improve the landscape in this area. A landscape-led masterplan would ensure that development is successfully integrated into the landscape and provide enhancements to the landscape and visual amenity of the area. A travel plan promoting alternative travel choices to the private car, including off-site measures to support cycling and walking, alongside other sustainable methods including public transport and lower emission vehicles will need to part of any planning application.</p> <p>SA Conclusion The policy as proposed to be modified recognises that the site is not considered a sustainable location for development and that a travel plan promoting alternative choices to the private car will need to be considered alongside other off-site measures (cycling and walking). This results in increased positive effects against obj 7. Redevelopment of the brownfield part of the site gives rise to an opportunity to plan positively for the site, which presently appears an alien feature across the wider Levels. Allocation of the greenfield part of this site for playing pitches will help to alleviate the shortfall identified within Bexhill.</p>
2	Improve the health and well-being of the population and reduce inequalities in health.	—		(✓)	
3	Reduce crime and fear of crime.	—		—	
4	Reduce deprivation and social exclusion.	(✓)		—	
5	Raise educational achievement levels and develop the opportunities for lifelong learning.	(✓)		—	
6	Sustain economic growth and competitiveness and encourage innovation in higher value/lower impact activities.	—		—	
7	Improve accessibility to services and facilities for all ages across the District.	—		(✓)	
8	Encourage and facilitate increased engagement in cultural and leisure activities	(✗)		(✓)	
9	Improve efficiency in land use and encourage the prudent use of natural resources	—		(✓)	
10	Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage.	—		(✓)	
11	Reduce emissions of Greenhouse gases.	—		—	
12	Minimise the risk of flooding and resulting detriment to people and property.	(✓)		(✓)	
13	Maintain, improve and manage water resources in a sustainable way.	(✓)		—	
14	Conserve and enhance biodiversity.	—		—	
15	Protect and enhance the high quality natural and built environment.	(✓)		(✓)	
16	Reduce waste generation and disposal, and achieve the sustainable management of waste.	—		—	
Cumulative Effects		Bexhill is the District Centre of Rother (as defined in the Core Strategy) and clearly warrants retention of its development boundary. The preferred sites comprise of a mix of provision, including large scale mixed use extensions of the edge of Bexhill to smaller redevelopment and infill areas within the existing development boundary. There will need to be careful consideration of the cumulative impact upon both traffic congestion and the ability to access sites by foot, cycle and bus. Careful planning will be needed to maximise benefits beyond site scale, with wider than site-specific factors given full consideration. In combination, all the preferred sites make a significant contribution towards meeting the overall housing target for the District and meets the specific target for Bexhill. The preferred sites are considered to be appropriate in terms of scale and environmental impact (in natural and built environment terms) for their locations. They are in sustainable locations , reasonably close to shops, GPs bus services etc., which will benefit economically from the cumulative effects of developing sites, and there is an associated environmental and social benefit in reducing the need to travel. Landscape and biodiversity impacts are minimal as a result of the proposed developments and relevant policy criteria are included within the respective policies where mitigation from development is required. In all cases, careful consideration to needs to made to the individual and overall impact of development on the built environment and the wider landscape on those areas on the edge of Bexhill. Therefore it is concluded these preferred sites represent the most sustainable options to meet Bexhill's development targets.			

HASTINGS FRINGES POLICIES		Policy HAS2: Land at Michael Tyler's, Woodlands Way, Hastings (MM19)	
SA Objective		Score	Commentaries and Likely Significant Effects
1	Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home.	(✓)	<p>Commentary on Economic Objectives (Primarily 1, 4, 5, 6, 9)</p> <p>Will contribute towards the overall housing target for the Hastings Fringes (Obj. 1). It is a brownfield site and located adjacent to existing (and under construction) residential development and is reasonably well related to services within Hastings (Obj. 7). Redevelopment of this site for housing will involve the loss of a low grade employment site in an accessible location, which scores negatively against objective 6. However, this is an underused brownfield site (Obj. 9) which could be put to better use for a mixed tenure housing development (Obj. 1 and 4).</p> <p>Commentary on Social Objectives (Primarily 1, 2, 3, 4, 5, 7, 8, 10)</p> <p>The site offers a sustainable, accessible option for housing development close to services within Hastings (Objs. 2, 6 and 7). The development will bring forward a mixed tenure housing development, including affordable housing in line within the policy (Obj. 1 and 4).</p> <p>Commentary on Environmental Objectives (Primarily 9, 10, 11, 12, 13, 14, 15, 16)</p> <p>This brownfield site is located adjacent to the High Weald Area of Outstanding Natural Beauty (AONB) - to the north - and redevelopment must respect these wider views, as well as the relationship with surrounding residential development (Obj.15). There are areas of known surface water drainage which would need to be addressed as part of the development (Objs. 12, 13). Wider boundary screening to the west and north of the site would need strengthening in order to prevent overlooking and provide an appropriate screening between the site and the wider AONB (Obj. 15). Watercourses flow north into gills and are vulnerable to changes in water quality, impacts will need to be considered in any scheme design (Obj 12 & 13).</p> <p>Potential Mitigation</p> <p>The provision of a Local Area for Play in an area where there is little provision will provide a space for children in the area to play. Given the site is located adjacent to the High Weald AONB, careful consideration will need to be made to the impact of wider views in line with the provisions of the policy. Boundary screening on the western and northern boundaries will ensure that there is no negative impact on residential amenity. Surface water drainage proposals will need to ensure that there is no adverse impact on the gills to the north of the site.</p> <p>SA Conclusion</p> <p>This brownfield site is considered appropriate for residential development, even though this results in the loss of employment floorspace within the District. The site comprises underused, low grade employment floorspace development and the advantages of housing are considered to outweigh the loss of employment provision in this instance. The policy as proposed to be modified recognises that watercourses flow north into gills and are vulnerable to changes in water quality. Therefore surface water drainage proposals will need to ensure that there is no adverse impact on the gills to the north of the site. This results in increased positive effects against obj 12 & 13.</p>
2	Improve the health and well-being of the population and reduce inequalities in health.	(✓)	
3	Reduce crime and fear of crime.	(✓)	
4	Reduce deprivation and social exclusion.	(✓)	
5	Raise educational achievement levels and develop the opportunities for lifelong learning.	~	
6	Sustain economic growth and competitiveness and encourage innovation in higher value/lower impact activities.	(✗)	
7	Improve accessibility to services and facilities for all ages across the District.	~	
8	Encourage and facilitate increased engagement in cultural and leisure activities	~	
9	Improve efficiency in land use and encourage the prudent use of natural resources	(✓)	
10	Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage.	~	
11	Reduce emissions of Greenhouse gases.	~	
12	Minimise the risk of flooding and resulting detriment to people and property.	(✓)	
13	Maintain, improve and manage water resources in a sustainable way.	(✓)	
14	Conserve and enhance biodiversity.	~	
15	Protect and enhance the high quality natural and built environment.	~	
16	Reduce waste generation and disposal, and achieve the sustainable management of waste.	~	
Cumulative Effects			<p>The 'Hastings Fringes' is an area identified in the Core Strategy as those areas that are contiguous with the built up area of Hastings extending within Rother district and clearly warrants retention of its development boundary. The preferred housing site (HAS2) is located off 'The Ridge', with the preferred employment site (HAS3) accessed from the Ivyhouse Lane Industrial Estate (via 'The Ridge'). There will need to be careful consideration of the cumulative impact upon both traffic congestion and the ability to access sites by foot, cycle and bus. Careful planning will be needed to maximise benefits beyond site scale, with wider than site-specific factors given full consideration. The implementation of policy HAS3 is considered to be an enabling policy which allows for the provision for small-scale employment development to provide a number of environmental and access improvements to the fringes of the industrial estate, along other already planned developments. Policy HAS2 provides for housing development close to areas of existing (and under construction) housing accessed from 'The Ridge'. In all cases, careful consideration to needs to made to the individual and overall landscape impact of development on the adjacent High Weald AONB.</p>

BROAD OAK POLICIES		Policy BRO2: Land South of Rainbow Trout Pub (site BO22) (MM21)	
SA Objective		Score	Commentaries and Likely Significant Effects
1	Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home.	✓	<p><u>Commentary on Economic Objectives (Primarily 1, 4, 5, 6, 9)</u> BRO2 will provide housing but also affordable housing and much needed smaller units in line with policy. The central location of the site will ensure good links to local services and amenities (Objectives 4, 5, 7, 8) and supporting the continued viability and vitality of local services and businesses (Objective 6). In addition BRO2 ensures the most efficient use of the land (Objective 9).</p> <p><u>Commentary on Social Objectives (Primarily 1, 2, 3, 4, 5, 7, 8, 10)</u> BRO2 is well placed to access all services and is within reasonable walking distance to the primary school, local shop and recreation ground (Objective 7, 8 and 10). The retention of the public house supports the retention of good access to this community facility (Objective 8). Wastewater capacity is limited in this area and an upgrade is required (Obj 7).</p> <p><u>Commentary on Environmental Objectives (Primarily 9, 10, 11, 12, 13, 14, 15, 16)</u> The site is partly greenfield and within the AONB, but the southern section is relatively well screened by existing hedgerows and tree belts. Existing hedgerows and trees belts will be retained and enhanced by further planting on the boundaries of the site to minimise the wider visual impact in the AONB landscape especially to the south(Objective 15).</p> <p><u>Potential Mitigation</u> Screening planting on the boundaries of the site will limit the limited visual intrusion in the AONB landscape. Wastewater capacity is limited and an upgrade of existing infrastructure is required.</p> <p><u>SA Conclusions</u> In sustainability terms BRO2 scores well against many of the sustainability objectives. The preferred use of the site is a residential development, together with the retention of the public house. The policy as proposed to be modified recognises that wastewater capacity is limited and an upgrade of existing infrastructure is required as set out in Policy BRO2.</p>
2	Improve the health and well-being of the population and reduce inequalities in health.	(✓)	
3	Reduce crime and fear of crime.	~	
4	Reduce deprivation and social exclusion.	(✓)	
5	Raise educational achievement levels and develop the opportunities for lifelong learning.	(✓)	
6	Sustain economic growth and competitiveness and encourage innovation in higher value/lower impact activities.	~	
7	Improve accessibility to services and facilities for all ages across the District.	(✓)	
8	Encourage and facilitate increased engagement in cultural and leisure activities	(✓)	
9	Improve efficiency in land use and encourage the prudent use of natural resources	(✓)	
10	Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage.	(✓)	
11	Reduce emissions of Greenhouse gases.	~	
12	Minimise the risk of flooding and resulting detriment to people and property.	~	
13	Maintain, improve and manage water resources in a sustainable way.	~	
14	Conserve and enhance biodiversity.	~	
15	Protect and enhance the high quality natural and built environment.	~	
16	Reduce waste generation and disposal, and achieve the sustainable management of waste.	~	
Cumulative Effects		In combination the two sites will provide for a significant increase in the number of dwellings, including affordable housing over the plan period, relative to the size of the village. The two sites will continue to support the viability and vitality of important local services in the village including the school, shop, pub and the local bus services. Landscape and biodiversity impacts are minimal as a result of the proposed developments and have been partially mitigated by the policy criteria. In combination, it is concluded these two sites represent the most sustainable option to meet Broad Oak's housing requirement.	

CAMBER POLICIES		Policy CAM1: Land at the Former Putting Green (Site CM2) (MM22)		Policy CAM2: Land at Central Car Park (Site CM6) (MM23)	
SA Objective		Score	Commentaries and Likely Significant Effects	Score	Commentaries and Likely Significant Effects
1	Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home.	(✓)	<p>Commentary on Economic Objectives (Primarily 1, 4, 5, 6, 9)</p> <p>The policy will provide housing, including affordable housing (Objectives 1, 4) in a location that can be well integrated into the wider fabric of the village (Objective 4). While there is a small amount of commercial development in the locality (Objective 6), this site is more suited to a wholly residential scheme, particularly given the village's housing need and the lack of alternative sites for residential development.</p> <p>Commentary on Social Objectives (Primarily 1, 2, 3, 4, 5, 7, 8, 10)</p> <p>Regarding social objectives, Policy CAM1 scores well against SA Objectives. CAM1 is well related to the existing built up area of Camber and is centrally placed to access the majority of village services by foot (Objective 7). There is no school in the village, hence the low score on objective 5.</p> <p>Commentary on Environmental Objectives (Primarily 9, 10, 11, 12, 13, 14, 15, 16)</p> <p>CAM1 is a brownfield site and the redevelopment of the site for residential makes best use of land (Objective 9) while also offering an opportunity to significantly improve the appearance of the site to the benefit of the street scene (objective 15). There are environmental constraints which impact on CAM1. The site lies within Flood Zone 2. The main flood risk to Camber is tidal flooding. The completion of the recent Broomfield Sea wall defence has increased protection locally. The surrounding countryside is subject to a number of International and national environmental designations including SSSI, SPA, and RAMSAR and managed accordingly. Camber is popular with visitors during period of fine weather and the population of the village can increase significantly during these periods. Recreational pressure particularly on the International Sites will be managed through the Sustainable Access and Recreation Management Strategy (SARMS).</p> <p>Potential Mitigation</p> <p>Mitigation for flood risk will be localised to CAM1 with the applicant required to submit FRA, (Objective 12). Recreational pressure on the sensitive nature conservation sites will be managed through the implementation of the SARMS. The need to protect the adjacent SPA/Ramsar site is specifically taken account of in the policy to ensure there is no adverse effect on the integrity of the Natura 2000 sites.</p> <p>Conclusions</p> <p>The policy framework for CAM1 is informed by the adopted Camber Village SPD and SA. The provisions of Policy CAM1, as proposed to be modified, promote a sustainable use of a brownfield site. The central location within the existing fabric of the village promotes accessibility by sustainable modes to the full range of village services, and enhances accessibility for existing areas. The creation of housing, including affordable housing, will have positive social effects. The need to protect the adjacent SPA/Ramsar site is specifically taken account of in the policy to ensure there is no adverse effect on the integrity of the Natura 2000 sites.</p>	(✗)	<p>Commentary on Economic Objectives (Primarily 1, 4, 5, 6, 9)</p> <p>The policy will provide commercial (objective 6) and community facilities (Objective 7 and 8) in a location that can be well integrated into the wider fabric of the village (Objective 4).</p>
2	Improve the health and well-being of the population and reduce inequalities in health.	(✓)		(✓)	<p>Commentary on Social Objectives (Primarily 1, 2, 3, 4, 5, 7, 8, 10)</p> <p>CAM2 is well related to the existing built up area of Camber and is centrally placed to access the majority of village services by foot (Objective 7 and 8).</p>
3	Reduce crime and fear of crime.	—		—	<p>Commentary on Environmental Objectives (Primarily 9, 10, 11, 12, 13, 14, 15, 16)</p>
4	Reduce deprivation and social exclusion.	(✓)		(✓)	<p>CAM2 is a brownfield site and its redevelopment for tourism and other uses makes best use of land (Objective 9), while also offering an opportunity to significantly improve the appearance of the site to the benefit of the street scene (objective 15). The site lies within Flood Zone 3a and is not well-defended from tidal flooding (unlike the majority of the village, which is well defended). This means it is not suitable for residential re-use, although holiday accommodation would be appropriate at first floor level, subject to a site specific flood risk assessment. The surrounding countryside is subject to a number of International and national environmental designations including SSSI, SPA, and RAMSAR and managed accordingly. Camber is popular with visitors during periods of fine weather and the population of the village can increase significantly during these periods. Recreational pressure particularly on the International Sites will be managed through the Sustainable Access and Recreation Management Strategy (SARMS).</p>
5	Raise educational achievement levels and develop the opportunities for lifelong learning.	(✗)		—	
6	Sustain economic growth and competitiveness and encourage innovation in higher value/lower impact activities.	—		(✓)	
7	Improve accessibility to services and facilities for all ages across the District.	(✓)		(✓)	<p>Potential Mitigation</p> <p>Mitigation for flood risk will be localised to CAM2 with the applicant required to submit FRA (Objective 12). Similar to CAM1, recreational pressure in Camber will be managed through the implementation of the SARMS. The need to protect the adjacent SPA/Ramsar site is specifically taken account of in the policy to ensure there is no adverse effect on the integrity of the Natura 2000 sites. The loss of car parking on Central Car Park will be mitigated through a traffic management scheme, which could include a rebalancing of spaces from site to the adjacent overflow car park, in partnership with ESCC.</p>
8	Encourage and facilitate increased engagement in cultural and leisure activities	(✓)		(✓)	
9	Improve efficiency in land use and encourage the prudent use of natural resources	(✓)		(✓)	<p>SA Conclusions</p>
10	Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage.	—		—	<p>The policy framework for CAM2 is informed by the adopted Camber Village SPD and SA. The provisions of Policy CAM2, as proposed to be modified, promote a sustainable use of a brownfield site. The site is well placed to access the full range of village services. The creation of tourism and other uses and the retention of key services will provide local jobs and support the local economy. The need to protect the adjacent SPA/Ramsar site is specifically taken account of in the policy to ensure there is no adverse effect on the integrity of the Natura 2000 sites.</p>
11	Reduce emissions of Greenhouse gases.	—		—	
12	Minimise the risk of flooding and resulting detriment to people and property.	(✗)		(✗)	
13	Maintain, improve and manage water resources in a sustainable way.	—		—	
14	Conserve and enhance biodiversity.	(✓)		(✓)	
15	Protect and enhance the high quality natural and built environment.	(✓)		(✓)	
16	Reduce waste generation and disposal, and achieve the sustainable management of waste.	—		—	
Cumulative Effects		In combination the two sites will provide for a managed increase in the number of dwellings over the plan period, relative to the size of the village, together with new tourism uses. Both sites are brownfield sites making best use of land. Traffic management will be approached in a holistic way including the mitigation of the loss of car parking spaces. Recreation pressure will be managed through the Sustainable Access and Recreation Management Strategy. Respective sustainability weaknesses have been mitigated by the policy criteria and framed by the adopted Camber SPD. While CAM1 only provides 10 dwellings, relative to Camber's housing target of 20 dwellings, no other sustainable sites have been identified, especially having regard to critical flood risk and biodiversity objectives.			

CATSFIELD POLICY		Policy CAT1: Land west of the B2204 (Site CA12) (MM24)	
SA Objective		Score	Commentaries and Likely Significant Effects
1	Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home.	✓	<p><u>Commentary on Economic Objectives (Primarily 1, 4, 5, 6, 9)</u> Will provide a significant quantity of housing, including affordable and smaller units (Ob.1). Not in a village with a large economic base, but development at this location will support the continued viability of local village businesses (Ob 6).</p> <p><u>Commentary on Social Objectives (Primarily 1, 2, 3, 4, 5, 7, 8, 10)</u> From a social perspective, the site offers a sustainable opportunity for development. It directly abuts a shop, post office and public house (Ob.7) and bus stop. Site is within a reasonable walking distance (approx. 500m) of the village primary school (Ob. 5).</p> <p>Potential for a well integrated development, providing a mix of units (including affordable) located at the heart of the village. The inclusion of the village green will promote effective integration (Ob.4). Not a village with a GP surgery and the site is large relative to the size of the settlement, but the provision of open space alongside development will provide some health benefits (Ob.2). Local cultural and leisure facilities are limited, but in the village context this site is ideally placed to access both the village hall and the recreation ground/play area by foot, as well as providing an on-site village green that may offer a focal point for community activities (Ob.8).</p> <p><u>Commentary on Environmental Objectives (Primarily 9, 10, 11, 12, 13, 14, 15, 16)</u> The site is within the AONB, but screened by tree belts and vegetation which mitigate wider visual impact to a large extent, the Pevensy Levels Hydrological Catchment Area (PLHCA) just crosses into the north-western corner of the site (Ob. 15). Loss of trees will be minimal, although scrub clearance will be necessary to secure access (Ob 11). Although greenfield, the site is unused (Ob 9). The site is also almost entirely free of flood risk, and has scope for SuDS (Obs. 12 and 13). The site benefits from an adjacent bus stop and service and being close to services (Ob. 10 and 11). Impacts on biodiversity are minimal, with no designated sites or priority habitats affected (Ob 14). In common, with most of the village, the frontage is within the Archaeological Notification Area. The site is adjacent the Grade 2 listed White Hart, although the proposed layout's inclusion of a village green offers scope to enhance the setting (Ob15).</p> <p><u>Potential Mitigation</u> As discussed, the inclusion of a village green will have multiple social and environmental benefits that mitigate harm from development and provide an opportunity to create a central green for wider village use (incorporated into CAT1(iii)), which would also help integrate the development as well as respecting the setting of the listed White Hart. Impacts upon neighbouring amenities could be mitigated by boundary planting. SuDS will be necessary and provision of hedgerow screening will provide habitats in accordance with policy. The topography of the site falls to the south-east meaning that discharge from this small area is unlikely to significantly affect the PLHCA, however consideration will need to be made to the requirements to Policy DEN5.</p> <p><u>SA Conclusions</u> Although a greenfield site that is of a large scale relative to the size of the settlement, there are several sustainability advantages of development here. The most sustainable use of the site is considered to be a residential led development with supporting open space in the form of a village green, as specified in the policy. It largely meets Catsfield's residual housing target. The policy as proposed to be modified also recognises that the north-western corner of the site is located in the Pevensy Levels Hydrological Catchment and that an Appropriate Assessment will be required under the Habitats Regulations at the planning application stage. This results in increased positive effects against obj 12 & 13.</p>
2	Improve the health and well-being of the population and reduce inequalities in health.	(✓)	
3	Reduce crime and fear of crime.	~	
4	Reduce deprivation and social exclusion.	(✓)	
5	Raise educational achievement levels and develop the opportunities for lifelong learning.	(✓)	
6	Sustain economic growth and competitiveness and encourage innovation in higher value/lower impact activities.	~	
7	Improve accessibility to services and facilities for all ages across the District.	(✓)	
8	Encourage and facilitate increased engagement in cultural and leisure activities	(✓)	
9	Improve efficiency in land use and encourage the prudent use of natural resources	~	
10	Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage.	~	
11	Reduce emissions of Greenhouse gases.	~	
12	Minimise the risk of flooding and resulting detriment to people and property.	✓	
13	Maintain, improve and manage water resources in a sustainable way.	(✓)	
14	Conserve and enhance biodiversity.	~	
15	Protect and enhance the high quality natural and built environment.	~	
16	Reduce waste generation and disposal, and achieve the sustainable management of waste.	~	
Cumulative Effects		N/A	

FAIRLIGHT COVE POLICIES		Policy FAC2: Land east of Waites Lane (Site FC2) (MM25) (MM26) (PMM5)	
SA Objective		Score	Commentaries and Likely Significant Effects
1	Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home.	✓	<p><u>Commentary on Economic Objectives (Primarily 1, 4, 5, 6, 9)</u> Will provide housing, including affordable housing and housing for older people.</p> <p><u>Commentary on Social Objectives (Primarily 1, 2, 3, 4, 5, 7, 8, 10)</u> Reserving space for a doctor's surgery and the inclusion of open space offer benefits to the development and the wider village (objs. 2, 7). These also help counter the weakness in the site of it not being directly connected to the core of the village and its services. There is no school in the village (obj. 5).</p> <p><u>Commentary on Environmental Objectives (Primarily 9, 10, 11, 12, 13, 14, 15, 16)</u> There are known drainage capacity concerns in the village and a stream to the south of the site (objs. 12, 13, 14), although adverse effects in these respects are mitigated through policy criteria and DaSA Local Plan Policy DEN5, hence the neutral scoring. Similarly, effects on the adjoining area of woodland (objective 14) are mitigated. Although the site is within the AONB, it is relatively contained and has been assessed in landscape terms as having some capacity for development, although the scale of development is necessarily limited. Boundary tree belts are required to be retained and enhanced (obj. 15). Safe access will need to be achieved from Pett Level Road (obj 10).</p> <p><u>Potential Mitigation</u> As detailed above, the policy includes a number of criteria to mitigate adverse effects on landscape impact, drainage and archaeology. Widening of access point ensures safe access can be achieved into the site from Pett Level Road.</p> <p><u>SA Conclusions</u> The policy as proposed to be modified recognises the need for a widened access from Pett Level Road to enable a safe access point to be achieved, this results in increased positive effects against obj 10. The use of the site for a limited amount of housing (including older people's housing), reserving a plot for a doctor's surgery and open space respects its sensitive location within the AONB and adjacent to an area of woodland, while also providing valuable community facilities. This scale and type of development is considered sustainable, subject to the detailed policy criteria.</p>
2	Improve the health and well-being of the population and reduce inequalities in health.	✓	
3	Reduce crime and fear of crime.	⌞	
4	Reduce deprivation and social exclusion.	(✓)	
5	Raise educational achievement levels and develop the opportunities for lifelong learning.	(x)	
6	Sustain economic growth and competitiveness and encourage innovation in higher value/lower impact activities.	⌞	
7	Improve accessibility to services and facilities for all ages across the District.	(✓)	
8	Encourage and facilitate increased engagement in cultural and leisure activities	⌞	
9	Improve efficiency in land use and encourage the prudent use of natural resources	⌞	
10	Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage.	(✓)	
11	Reduce emissions of Greenhouse gases.	⌞	
12	Minimise the risk of flooding and resulting detriment to people and property.	⌞	
13	Maintain, improve and manage water resources in a sustainable way.	⌞	
14	Conserve and enhance biodiversity.	⌞	
15	Protect and enhance the high quality natural and built environment.	(✓)	
16	Reduce waste generation and disposal, and achieve the sustainable management of waste.	⌞	
Cumulative Effects		The cumulative effect will be positive in terms of addressing housing needs. The site has a lesser impact upon the landscape, heritage and ecology, relative to other options.	

RYE HARBOUR POLICIES		Policy RHA1: Land at Stonework Cottages (Site RH10) (MM27)		Policy RHA2: Harbour Road Employment Area (MM28) (MM29)	
SA Objective		Score	Commentaries and Likely Significant Effects	Score	Commentaries and Likely Significant Effects
1	Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home.	✓	<p>Commentary on Economic Objectives (Primarily 1, 4, 5, 6, 9) The site will provide housing, including affordable housing and smaller units for Harbour Village (Objective 1). Harbour Village has close economic links with the larger settlement of Rye and is dependent on the larger settlement for many higher level services which cannot be found in Harbour Village. The site is currently partly in a low-key employment use but is of low quality, and is partly disused. The proposal for residential development will improve the local amenity of the area. While the loss of employment is contrary to Objective 6, the wider sustainability benefit of residential development will contribute to the continued viability and vitality of the local economy of Harbour Village (Objective 1).</p> <p>Commentary on Social Objectives (Primarily 1, 2, 3, 4, 5, 7, 8, 10) The policy scores relatively well against SA social Objectives. The site is well related to the existing built up area of Harbour Village. The village is relatively well off in terms of services and the site is within 400 metres walking distance of all main amenities, although the village has no school (Objective 5). However, the site is located near the bus stop on Harbour Road and provides a bus link to Rye town centre.</p> <p>Commentary on Environmental Objectives (Primarily 9, 10, 11, 12, 13, 14, 15, 16) The site is brownfield and its redevelopment for residential use makes best use of land (Objective 9). However, there are significant environmental constraints which impact on it. The whole of Rye Harbour lies within Flood Zone 3a. The main flood risk to Rye Harbour is from the tidal River Rother. Increased protection from Rother Tidal Wall West and the Winchelsea flood protection scheme has improved protection locally. The groundwater is particularly shallow beneath the surface of the site and there may be an existing level of contamination which could leave the underlying aquifer vulnerable to pollution (objective 13). The surrounding countryside is subject to a number of international and national environmental designations including SSSI, SPA and RAMSAR, adjacent to the site. Recreational pressure particularly on the International Sites will be managed through the Sustainable Access and Recreation Management Strategy (SARMS) (Obj 15). In addition, regard should be given to the setting of the Grade II listed School House and Grade II Listed Church of the Holy Spirit to the west.</p> <p>Potential Mitigation The policy includes mitigation at part (iii) against harm to the adjacent SSSI, SPA and Ramsar site by requiring the existing tree belt to be retained and enhanced with native species with appropriate fencing erected to maintain an effective barrier between the site and the protected area (objective 14). Part (iv), the requirement for ecological surveys and appropriate mitigation, will prevent harm to any protected species found to be using the site (objective 14). Part (v) requires a flood risk assessment, to mitigate potential harm from flooding (objective 12); and part (v) requires a ground contamination assessment to mitigate harm from pollution (objective 13). Recreational pressure on the sensitive nature conservation sites will be managed through the implementation of the SARMS. The need to protect the adjacent SPA/Ramsar site is specifically taken account of in the policy to ensure there is no adverse effect on the integrity of the Natura 2000 sites. Foul water and surface water drainage which includes surface water protection measures, potentially including SuDS (although the high water table and risk of contamination needs to be considered) will be required through a policy criteria.</p> <p>SA Conclusions The site is the most sustainable site that has been considered suitable for residential development. While currently in some low-key employment use the sustainability benefits of residential development here outweigh any disadvantages. The development of the site will also consolidate the viability and vitality of the village and support local businesses. The policy as proposed to be modified recognises the need to protect the adjacent SPA/Ramsar site and is specifically taken account of in the policy to ensure there is no adverse effect on the integrity of the Natura 2000 sites. In addition, foul water and surface water drainage which includes surface water protection measures, potentially including SuDS is also set out through policy criteria. This results in increased positive effects against obj 14 and 15. Overall the provisions of RHA1 promote a sustainable use of the site.</p>	—	<p>Commentary on Economic Objectives (Primarily 1, 4, 5, 6, 9) Promoting business development at the long-established major industrial area, primarily through making best use of brownfield land, clearly supports objective 6, as well as objective 4 (as the area provides an accessible wide range of jobs for residents of Rye and Rye Harbour) and objective 9. While it would not provide housing (Objective 1), the area is an established business area and would not be compatible with residential development.</p>
2	Improve the health and well-being of the population and reduce inequalities in health.	(✓)		—	
3	Reduce crime and fear of crime.	—		—	<p>Commentary on Social Objectives (Primarily 1, 2, 3, 4, 5, 7, 8, 10) Regarding social objectives, as well as being adjacent to Rye Harbour and within ready cycling if not walking distance of Rye, the employment area is accessible by bus and there is now a cycleway along Harbour Road. Accessibility to the wharf is also important for the transport of heavy goods such as aggregates and grain, reducing long lorry movements to more distant ports.</p>
4	Reduce deprivation and social exclusion.	(✓)		(✓)	<p>Commentary on Environmental Objectives (Primarily 9, 10, 11, 12, 13, 14, 15, 16) The area is subject to multiple constraints. The whole of the area lies within Flood Zone 3a. The main flood risk to Rye Harbour is from the tidal River Rother. Increased protection from Rother Tidal Wall West and the Winchelsea flood protection scheme has improved protection locally. Also, business uses are less vulnerable than residential. The surrounding countryside is subject to a number of international and national environmental designations including SSSI, SPA and RAMSAR, although development is, in the main, kept to previously developed land. The amendment to the employment area boundary affects land within the Rye Harbour SSSI, which is incorporated into the employment area, and</p>
5	Raise educational achievement levels and develop the opportunities for lifelong learning.	(✗)		—	which benefits from planning permission. This was the subject of detailed discussions with Natural England during the determination of the relevant planning application and the specific proposal was deemed acceptable due to measures proposed for habitat creation. Recreational pressure particularly on the International Sites will be managed through the Sustainable Access and Recreation Management Strategy (SARMS) (Obj 15).
6	Sustain economic growth and competitiveness and encourage innovation in higher value/lower impact activities.	(✗)		✓	<p>Potential Mitigation The policy includes a number of criteria to mitigate potential adverse impacts: criterion (i) addresses possible adverse impacts of additional traffic causing congestion at the main road junction (see objective 10); criterion (ii) addresses contamination (see objective 13); criteria (iii) and (iv) respectively promote measures to reduce the visual intrusion of the industrial development on local amenities, essentially along the road, and to prevent adverse impact on the designated nature conservation sites and even lead to improvements.(see objectives 14 and 15), while criterion (v) requires any necessary mitigation for flood risk. Recreational pressure on the sensitive nature conservation sites will be managed through the implementation of the SARMS. The need to protect the adjacent SPA/Ramsar site is specifically taken account of in the policy to ensure there is no adverse effect on the integrity of the Natura 2000 sites. Foul water and surface water drainage which includes surface water protection measures, potentially including SuDS (although the high water table and risk of contamination needs to be considered) will be required through a policy criteria.</p>
7	Improve accessibility to services and facilities for all ages across the District.	(✓)		—	
8	Encourage and facilitate increased engagement in cultural and leisure activities	(✓)		—	<p>SA Conclusions The Employment Area should continue to play a significant role in supporting economic activity and job creation in the eastern part of the district. There are opportunities for further development, making best use of a number of unused or under-used brownfield sites. The policy as proposed to be modified recognises the need to protect the adjacent SPA/Ramsar site and is specifically taken account of in the policy to ensure there is no adverse effect on the integrity of the Natura 2000 sites. In addition, foul water and surface water drainage which includes surface water protection measures, potentially including SuDS is also set out through policy criteria. This results in increased positive effects against obj 14. The policy is found to properly highlight and effectively mitigate the acknowledged constraints on development and provide a framework for sustainable development.</p>
9	Improve efficiency in land use and encourage the prudent use of natural resources	✓		✓	
10	Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage.	—		(✓)	
11	Reduce emissions of Greenhouse gases.	—		—	
12	Minimise the risk of flooding and resulting detriment to people and property.	—		—	
13	Maintain, improve and manage water resources in a sustainable way.	—		—	
14	Conserve and enhance biodiversity.	(✓)		(✓)	
15	Protect and enhance the high quality natural and built environment.	(✓)		(✓)	
16	Reduce waste generation and disposal, and achieve the sustainable management of waste.	—		—	
Cumulative Effects		The respective policies address different strategic needs. They are not incompatible, with business use kept away from the village. Indeed, the employment policy area provides potential opportunities for the relocation of business activities on the land at Stoneworks Cottages in a more appropriate and managed environment.			

WESTFIELD POLICIES		Policy: WES4 - Land between Moor Lane and the A28, Westfield (Site WF27) (MM30) (PMM6)	
SA Objective		Score	Commentaries and Likely Significant Effects
1	Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home.	~	<p><u>Commentary on Economic Objectives (Primarily 1, 4, 5, 6, 9)</u> The limitations of the site itself means there is little potential for housing and employment opportunities (Ob.1).</p> <p><u>Commentary on Social Objectives (Primarily 1, 2, 3, 4, 5, 7, 8, 10)</u> Whilst there is a very small shortfall of allotments in the village, evidence of need is limited. Removal of this allocation limits wider social benefits that would have been achieved by providing a facility for outdoor recreation and food-growing (Objs. 2, 8.).</p> <p><u>Commentary on Environmental Objectives (Primarily 9, 10, 11, 12, 13, 14, 15, 16)</u> The site is overgrown with vegetation meaning that this provide an area for nesting habitats which is likely to continue in foreseeable future.</p> <p><u>Potential Mitigation</u> Whilst there is a very small shortfall of allotments in the village, evidence of need is limited.</p> <p><u>SA Conclusions</u> The removal of this policy for allotments results in an unknown score against many of the criteria, excepting Obj. 2 and 8 which recognise the lost opportunity to provide allotments in the village resulting in minor negative scores. Obj. 1 and 6 indicate that opportunities for housing and economic growth are limited due to the size of this site. Given that this site is outside the development boundary, likely future uses could be small scale residential curtilage extensions or some limited scope for an rural exception site, subject to compatibility with other Policies in the Local Plan.</p>
2	Improve the health and well-being of the population and reduce inequalities in health.	(×)	
3	Reduce crime and fear of crime.	?	
4	Reduce deprivation and social exclusion.	?	
5	Raise educational achievement levels and develop the opportunities for lifelong learning.	?	
6	Sustain economic growth and competitiveness and encourage innovation in higher value/lower impact activities.	?	
7	Improve accessibility to services and facilities for all ages across the District.	?	
8	Encourage and facilitate increased engagement in cultural and leisure activities	(×)	
9	Improve efficiency in land use and encourage the prudent use of natural resources	?	
10	Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage.	?	
11	Reduce emissions of Greenhouse gases.	?	
12	Minimise the risk of flooding and resulting detriment to people and property.	?	
13	Maintain, improve and manage water resources in a sustainable way.	?	
14	Conserve and enhance biodiversity.	~	
15	Protect and enhance the high quality natural and built environment.	~	
16	Reduce waste generation and disposal, and achieve the sustainable management of waste.	?	
Cumulative Effects		The two largest preferred development sites (WES1 and WES2) both abut the A28 and are likely to access via it. There will need to be careful consideration of the cumulative impact upon both traffic congestion and the ability to access both sites by foot, cycle and bus. Careful planning will be needed to maximise such benefits at a village scale, with wider than site-specific factors given full consideration. The implementation of policies WES1 and WES2 will have the inevitable consequence of erosion of rural character in the north-east of Westfield. However, given that this section is along a rising section of the A28, it is a preferable direction of growth in comparison to other areas of Westfield where environmental, heritage and landscape constraints are much greater. The preferred sites are all located reasonably accessibly to facilitate pedestrian travel to all key village services. As a consequence, a cumulative effect may be beneficial for the continued viability of local services. The removal of WES4 results in a slight worsening in the effect against obj 8 (increased engagement in cultural and leisure activities).	

Appendix 2: Schedule of Sustainability Appraisal (SA) Modifications

SA Mod #	Mod Description	Paragraph/s	Amendment/s as set out in Appendix 2a	Reason
SAM1	Amendment to scoring and commentary as a result of further consideration and initial responses to representations.	Bexhill site BX133 and Options	<p>Change the scoring against Objective 15 for option 2 (site BX133) from minor negative to major negative.</p> <p>Amend the final sentence of the commentary for option 2 site BX133 as follows: <i>Some positive (Obj 1 & 2) and minor negative (Obj 9-11 & 14-16, 14 & 16) sustainability criteria identified. One major negative criteria identified in respect of Obj 15.</i></p> <p><u>Please see Appendix 2a: Modified SA Table 1 for the amended Table.</u></p>	As a result of further consideration of objectives against SA scoring in line with the commentary provided in the Initial Responses to Representations - March 2019.
SAM2	Amendment to scoring and commentary as a result of further consideration and initial responses to representations.	Fairlight Cove Option FC2a	<p>Change the scoring against Objectives 6 and 7 for site FC2a from neutral to minor positive.</p> <p>Add the following wording to the end of the commentary for site FC2a: <i>While it would provide a shop in addition to the uses provided through FC2 (mixed use option) the SA scoring for objectives 6 and 7 are the same as there is an existing shop nearby and its inclusion would not have any significant additional effects in sustainability terms</i></p> <p><u>Please see Appendix 2a: Modified SA Table 2 for the amended Table.</u></p>	As a result of further consideration of objectives against SA scoring in line with the commentary provided in the Initial Responses to Representations - March 2019.
SAM3	Amendment to scoring and commentary as a result of further consideration and initial responses to representations.	Fairlight Cove Option FC2	<p>Change the scoring against Objectives 6 and 7 for site FC2 (Mixed use option – residential, doctor's surgery and open space) from neutral to minor positive.</p> <p>Amend the second sentence of the commentary for site FC2 (mixed use option) as follows: <i>Minor positive effects in economic growth and accessibility terms (obj. 6 & 7) as the development would provide some on-site employment and facilities but it is not directly linked to the core of the village (although this could be mitigated if a pedestrian link provided to Waites Lane).</i></p> <p><u>Please see Appendix 2a: Modified SA Table 2 for the amended Table.</u></p>	As a result of further consideration of objectives against SA scoring in line with the commentary provided in the Initial Responses to Representations - March 2019.
SAM4	Amendment to scoring and commentary as a result of further consideration and initial responses to representations.	Fairlight Cove Policy FAC2	<p>Change the scoring against Objective 6 for Policy FAC2 from neutral to minor positive.</p> <p>Add the following sentence to the end of the commentary for Policy FAC2 under the heading "Commentary on Economic Objectives (Primarily 1, 4, 5, 6, 9)": <i>The doctor's surgery will provide some on-site employment (obj. 6).</i></p> <p><u>Please see Appendix 2a: Modified SA Table 3 for the amended Table.</u></p>	As a result of further consideration of objectives against SA scoring in line with the commentary provided in the Initial Responses to Representations - March 2019.

Appendix 2a: Modified SA Tables

Modified SA Table 1 | North Bexhill Option 2 [SAM1]

BEXHILL OPTIONS 8		BX133: North Bexhill
Proposed For / Main Use Considered		Option 2
SA Objective		Score
1	Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home.	✓
2	Improve the health and well-being of the population and reduce inequalities in health.	✓
3	Reduce crime and fear of crime.	(✓)
4	Reduce deprivation and social exclusion.	(✓)
5	Raise educational achievement levels and develop the opportunities for lifelong learning.	?
6	Sustain economic growth and competitiveness and encourage innovation in higher value/lower impact activities.	(✓)
7	Improve accessibility to services and facilities for all ages across the District.	(✓)
8	Encourage and facilitate increased engagement in cultural and leisure activities	(✓)
9	Improve efficiency in land use and encourage the prudent use of natural resources	(x)
10	Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage.	(x)
11	Reduce emissions of Greenhouse gases.	(x)
12	Minimise the risk of flooding and resulting detriment to people and property.	~
13	Maintain, improve and manage water resources in a sustainable way.	(✓)
14	Conserve and enhance biodiversity.	(x)
15	Protect and enhance the high quality natural and built environment.	x
16	Reduce waste generation and disposal, and achieve the sustainable management of waste.	(x)
Site Commentary, Likely Significant Effects, Potential Mitigation and Conclusions		This option is generally contained from the wider landscape to the north of the route of the North Bexhill Access Road, existing topography and existing landscaping in the form of the woodland and tree planting that lies to the north. However, this option proposes business development to the north of the NBAR and as a consequence, it lacks the containment of development achieved by Option 1 and therefore, on balance, would have a slightly increased landscape impact, albeit not enough to be assessed as having a potentially significant adverse effect within the context of the SA objectives. Some positive (Obj 1 & 2) and minor negative (Obj 9-11, 14 & 16) sustainability criteria identified. One major negative criteria identified in respect of Obj 15.

Modified SA Table 2 | Fairlight Cove Options: FC2 and FC2a [SAM2] [SAM3]

FAIRLIGHT COVE OPTIONS		FC2: Land east of Waites Lane	FC2a: Land south of Pett Level Road
Proposed For / Main Use Considered		Residential, doctors surgery, open space	Residential, doctors surgery, retail, open space
SA Objective		Score	Score
1	Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home.	✓	✓
2	Improve the health and well-being of the population and reduce inequalities in health.	✓	✓
3	Reduce crime and fear of crime.	~	~
4	Reduce deprivation and social exclusion.	(✓)	(✓)
5	Raise educational achievement levels and develop the opportunities for lifelong learning.	(x)	(x)
6	Sustain economic growth and competitiveness and encourage innovation in higher value/lower impact activities.	(✓)	(✓)
7	Improve accessibility to services and facilities for all ages across the District.	(✓)	(✓)
8	Encourage and facilitate increased engagement in cultural and leisure activities	~	~
9	Improve efficiency in land use and encourage the prudent use of natural resources	~	~
10	Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage.	~	~
11	Reduce emissions of Greenhouse gases.	~	~
12	Minimise the risk of flooding and resulting detriment to people and property.	(x)	(x)
13	Maintain, improve and manage water resources in a sustainable way.	~	~
14	Conserve and enhance biodiversity.	~	~
15	Protect and enhance the high quality natural and built environment.	(✓)	x
16	Reduce waste generation and disposal, and achieve the sustainable management of waste.	~	~
		Scores highly on social objectives, in particular those relating to housing and healthcare. Neutral Minor positive effects in economic growth and accessibility terms (obj. 6 & 7) as the development would provide some on-site employment and facilities but it is not directly linked to the core of the village (although this could be mitigated if a pedestrian link provided to Waites Lane). The site is screened to an extent and the inclusion of open space and boundary planting offers the opportunity to enhance its appearance (obj. 15). Adverse effects on flooding could be mitigated.	Scores very similarly to the mixed use option for the smaller portion of land, FC2, with the notable exception of objective 15 (natural/ built environment). The extent and position of the site means its development would have a significant and adverse landscape impact, detrimental to the character and appearance of the High Weald AONB, which could not be mitigated. Adverse effects on flooding could be mitigated. While it would provide a shop in addition to the uses provided through FC2 (mixed use option) the SA scoring for objectives 6 and 7 are the same as there is an existing shop nearby and its inclusion would not have any significant additional effects in sustainability terms.

Modified SA Table 3 | Fairlight Cove Policies: FAC2 [SAM4]

FAIRLIGHT COVE POLICIES		Policy FAC2: Land east of Waites Lane (Site FC2)	
SA Objective		Score	Commentaries and Likely Significant Effects
1	Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home.	✓	Commentary on Economic Objectives (Primarily 1, 4, 5, 6, 9) Will provide housing, including affordable housing and housing for older people. The doctor's surgery will provide some on-site employment (obj. 6).
2	Improve the health and well-being of the population and reduce inequalities in health.	✓	
3	Reduce crime and fear of crime.	~	
4	Reduce deprivation and social exclusion.	(✓)	Commentary on Social Objectives (Primarily 1, 2, 3, 4, 5, 7, 8, 10) Reserving space for a doctor's surgery and the inclusion of open space offer benefits to the development and the wider village (objs. 2, 7). These also help counter the weakness in the site of it not being directly connected to the core of the village and its services. There is no school in the village (obj. 5).
5	Raise educational achievement levels and develop the opportunities for lifelong learning.	(x)	
6	Sustain economic growth and competitiveness and encourage innovation in higher value/lower impact activities.	(✓)	
7	Improve accessibility to services and facilities for all ages across the District.	(✓)	Commentary on Environmental Objectives (Primarily 9, 10, 11, 12, 13, 14, 15, 16) There are known drainage capacity concerns in the village and a stream to the south of the site (objs. 12, 13, 14), although adverse effects in these respects are mitigated through policy criteria and DaSA Local Plan Policy DEN5, hence the neutral scoring. Similarly, effects on the adjoining area of woodland (objective 14) are mitigated. Although the site is within the AONB, it is relatively contained and has been assessed in landscape terms as having some capacity for development, although the scale of development is necessarily limited. Boundary tree belts are required to be retained and enhanced (obj. 15).
8	Encourage and facilitate increased engagement in cultural and leisure activities	~	
9	Improve efficiency in land use and encourage the prudent use of natural resources	~	
10	Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage.	~	Potential Mitigation As detailed above, the policy includes a number of criteria to mitigate adverse effects on landscape impact, drainage and archaeology.
11	Reduce emissions of Greenhouse gases.	~	
12	Minimise the risk of flooding and resulting detriment to people and property.	~	
13	Maintain, improve and manage water resources in a sustainable way.	~	SA Conclusions The use of the site for a limited amount of housing (including older people's housing), a doctor's surgery and open space respects its sensitive location within the AONB and adjacent to an area of woodland, while also providing valuable community facilities. This scale and type of development is considered sustainable, subject to the detailed policy criteria.
14	Conserve and enhance biodiversity.	~	
15	Protect and enhance the high quality natural and built environment.	(✓)	
16	Reduce waste generation and disposal, and achieve the sustainable management of waste.	~	
Cumulative Effects			