



Rother District Council



# Core Strategy

Proposed Submission  
Core Strategy -  
**Sustainability  
Appraisal**  
(incorporating focused  
amendments)

June 2012

[www.rother.gov.uk/corestrategy](http://www.rother.gov.uk/corestrategy)

Issues &  
Options



Strategy  
Directions



Pre - Submission



Examination



Adoption





## EXPLANATION OF FOCUSED AMENDMENTS

This Rother District Council Proposed Submission Core Strategy Sustainability Appraisal (incorporating focused amendments) is published in June 2012. It was agreed by the Council on 21<sup>st</sup> May 2012

As the title suggests, it adds focused amendments to the original Proposed Submission Core Strategy Sustainability Appraisal, published in August 2011.

Amendments are incorporated using the convention described below.

### Key to Amended or Additional Text

Appearance	Explanation
<del>Strikethrough purple font</del>	Deleted Text.
<u>Underlined purple font</u>	New Text

To avoid confusion, please also note items which may not have changed include the following:

Underlined blue font = Hyperlinks

Underlined font = Heading

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**Map 1:** Environmental Designations

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# **1 NON TECHNICAL SUMMARY**

## **1.1 Introduction**

- 1.1 The purpose of Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) is to help planning authorities contribute to achieving sustainable development in preparing their plans. Sustainable Development aims to integrate the need to stimulate economic growth, to deliver the needs of all sectors of society, and to conserve and enhance the local environment.
- 1.2 SEA involves examining certain plans and programmes primarily for significant environmental effects. SA widens the approach to include social and economic as well as environmental issues. Local Planning Authority (LPA) plans must undergo both the process of SA and SEA as a result of legislative changes enacted in the UK in summer 2004.
- 1.3 The combined process reviews plans against a set of criteria reflecting local problems and the LPA's objectives in delivering Sustainable Development and addressing these problems.
- 1.4 This report is the combined output of the SA and SEA processes and hereafter is called the SA. The stages of the SA preceding this report culminated in the production of a SA Scoping Report (available upon request from the Council), which documents the results of the gathering of evidence concerning the current social, economic and environmental conditions in the District.
- 1.5 The Scoping Report identified key sustainability problems or likely future problems by looking at statistical trends and comparing the performance of the District with East Sussex as a whole, the South East and England.

### *The Local Development Framework and the Core Strategy*

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

being of the area).

- 1.9 The Council has prepared its Proposed Submission Core Strategy on the basis of the consultation on the Consultation on Strategy Directions between November 2008 and January 2009.
- 1.10 The Core Strategy is also progressed with full regard to the Council's Corporate Plan which sets out the Council's contribution to achieving the Community Strategy.
- 1.11 It is concerned with 'place-shaping' and will establish the way in which the social, economic and environmental needs of the area can be delivered in the most sustainable way.
- 1.12 It provides broad guidance on the scale and distribution of development and the provision of supporting infrastructure. It also contains 'higher level' policies for delivering the spatial vision. It aims to ensure that investment decisions are not made in isolation, but are properly co-ordinated, with a focus on promoting the principles of sustainable development.



### ***Vision for Rother in 2028***

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

There is a strong commitment to a more sustainable future and a responsible, positive approach to helping address climate change issues. This is reflected in the sensitive stewardship of environmental resources and conservation of the area's highly valued outstanding environmental and cultural assets.

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

Improved economic and social well-being has been facilitated by better access to jobs and services, in both urban and rural areas, and improved connectivity with the rest of the region, including through effective telecommunications networks.

Development and change has contributed significantly to meeting local needs and aspirations, having responded positively to the district's circumstances, as well as to regional and sub-regional imperatives.

There has been a notable improvement in economic conditions in the coastal towns of Bexhill and Rye, as a result of a strong focus on regeneration in the 'Sussex Coast' sub-region, notably through close working with neighbouring Hastings.

Bexhill has retained and strengthened its distinct identity and become one of the most attractive places to live on the south coast - attractive to families, the young and older people alike. It is the main focus of development in the district, and this is enabling improvements in the supply of jobs and local facilities, shops and services.

Rye has improved its economic and social circumstances whilst fully respecting and sensitively managing its historic character, vulnerability to flooding and ecologically important setting. It maintains a strong tourism sector and Port activities.

The inland and essentially rural areas of Rother, falling mainly within the High Weald AONB, retain their essential character.

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

The character and diversity of villages has been retained. They are vibrant and inclusive, having evolved organically in a manner sensitive to their surroundings.

The countryside continues to be protected for its intrinsic value, and is well-managed, as well as being accessible and economically active, while change is carefully managed to respect its character.

### The SA process

- 1.13 The outcome of the preliminary 'Scoping' stage of the SA process was a set of Sustainability Objectives created to address the sustainability problems. These objectives can then be used collectively as a means to assess the Core Strategy Plan Objectives, Options and Strategies.
- 1.14 The statutory environmental agencies (Natural England, the Environment Agency and English Heritage) were consulted on the SA Scoping Report in August 2006 and again between December 2007 and February 2008 because the scope was updated.
- 1.15 To comply with the SA/SEA process, the Council's Strategic Options and Spatial and Thematic Strategies for the Core Strategy, which set out the key elements of the planning framework for Rother, have been reviewed against the Sustainability Objectives bearing in mind the following:
- Relevant government planning policy guidance on Local Spatial Planning PPS12
  - The extent to which the option supports other planning policy, for example, the Community Strategy, the Local Transport Plan and the key regional document, the South East Plan
  - Evidence from the environmental baseline about local conditions and problems
  - Representations received on the Consultation on Strategy Directions between November 2008 and January 2009.
  - Guidance and best practice documents including the ODPM SA and SEA Guidance Documents
  - Other relevant guidance issued by bodies such as the Environment Agency, Natural England, English Heritage and the RSPB on matters such as biodiversity, land use and climate change
- 1.16 Options were developed for policy areas, as set out in the Council's Initial Core Strategy Sustainability Report in November 2008 (Appendix 3). Within this SA Report for the Proposed Submission Core Strategy, Appendix 4 lists [relevant policies, plans, strategies and programmes further 'Plan Options' that have been given subsequent consideration,](#) whilst Appendix 5 contains the 'Sustainability Appraisal of Options'. In addition, all policies are now subject to SA and tested for sustainability at this 'proposed submission' stage. [Thus the Sustainability Appraisal of the Rother District Council Core Strategy has been an incremental process comprising several stages and documents.](#)

## 1.2 Outcomes of the Sustainability Process

- 1.2.1 The SA objectives were also considered with regard to the Core Strategy Objectives and this helped to inform the development of the Policies for each subject area.

### **Summary of the Likely Significant Effects of the Strategies**

- 1.2.2 Table 1.2 below summarises the assessment of the potentially significant effects of the Plan Policies on the SA Objectives. The SA Objectives are in bold and italics. (The Plan Policies and the detailed appraisal of them can be found in Appendix 6)

**Table 1.2 Summary of likely significant effects**

	<b>Sustainability Appraisal Objectives</b>
<b>1</b>	<b><i>Ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home</i></b> The significant effects on this SA Objective are beneficial and will potentially be from the Distribution of Development, Bexhill, Battle, Rural Areas, Local Housing Needs and Towards a Low Carbon Future policies.
<b>2</b>	<b><i>Improve the health and well-being of the population and reduce inequalities in health</i></b> Potential for the most significant beneficial effects on this Objective will be from the Distribution of Development, Bexhill and various policies in the Communities section (particularly CO2). The reason for the benefits from development is largely connected to the links between good quality, affordable housing and health and well-being
<b>3</b>	<b><i>Reduce crime and the fear of crime</i></b> This SA Objective is mainly affected by the Communities Strategy, which promotes working with partner authorities to address issues of crime and disorder and should help lead to significant beneficial effects for reducing crime and the fear of crime. However it is also positively influence by policies concerned with design quality and the public realm (EN3 and EN4) as well as policies which address deprivation and social exclusion, a contributory factor related to crime.
<b>4</b>	<b><i>Reduce deprivation and social exclusion</i></b> Significant beneficial effects on reducing deprivation and social exclusion should be experienced as a result of the implementation of policies for Economy and all the spatial policies. Particularly Bexhill, with its focus on providing additional employment opportunities, further education facilities, housing for younger people and support for older people and the focus of Rye on improving local social and economic conditions, should significantly contribute to this SA Objective. Most policies that result in new housing contribute to this SA objective which is reflective of the scale of housing need and its consequent links to wider social problems.
<b>5</b>	<b><i>Raise educational achievement levels and develop the opportunities for lifelong learning</i></b>

	The policies with potential for significant beneficial effects for raising educational attainment are Economy, Young People, and Community facilities. Bexhill also has a strong focus on improving educational opportunities.
<b>6</b>	<b><i>Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities</i></b> Collectively, most policies within the Core Strategy have a strong economic focus, as directed by the South East Plan in order to raise the economic profile of the region and particularly policies in the Economy chapter.
<b>7</b>	<b><i>Improve accessibility to services and facilities for all ages across the District</i></b> Potential for the most significant beneficial effects on improving accessibility within the District is from the Overall Spatial Strategy, Transport and Communities policies.
<b>8</b>	<b><i>Encourage and facilitate increased engagement in cultural and leisure activities</i></b> Policies within the Communities section have been judged to give rise to significant beneficial effects for increased engagement in cultural and leisure activities. A number of the spatial policies have been assessed as having more minor beneficial effects which cumulatively could have more significant effects.
<b>9</b>	<b><i>Improve efficiency in land use and encourage the prudent use of natural resources</i></b> Policies concerned with sustainable resource management are clearly highly beneficial in this regard. The Environment policies also have clear benefits. The overall spatial strategy has clear direction for making the most effective and efficient use of land, and the continued use of development boundaries will be particularly useful.
<b>10</b>	<b><i>Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage</i></b> The policy for Integrated Transport has been judged to have beneficial effect for this SA Objective. The encouragement of new enterprise and business into the District through the Economy Strategy and its facilitation of growth of 'home grown' businesses are likely to put more pressure on the road transport system and increase traffic movements within the District.

11	<p><b><i>Reduce emissions of Greenhouse gases</i></b></p> <p>An increase in the number of households and businesses in the District has the potential for a significant adverse effect on reducing greenhouse gas emissions. Other areas of policy (cross-cutting) will help to ensure sustainable construction which should help to limit the generation of new greenhouse gas emissions.</p>
12	<p><b><i>Minimise the risk of flooding and resulting detriment to people and property</i></b></p> <p>There are uncertainties for the effects on this SA Objective linked to the policies for Rye. The policies for the Environment should produce significant beneficial effects for this SA Objective.</p>
13	<p><b><i>Maintain, improve and manage water resources in a sustainable way</i></b></p> <p>The sustainable management of water is fundamental in achieving sustainable development and the Strategy for the Environment aims to minimise water use, to provide water supply in a sustainable way and to ensure efficient sustainable wastewater infrastructure. The Water Management policy should help to mitigate the adverse impacts on this SA Objective from other strategies.</p>
14	<p><b><i>Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats</i></b></p> <p>The related policy in the Environment section seeks to reduce negative effects on biodiversity by protecting priority habitats, identifying a greenspace network and proposing mitigation for significant losses.</p>
15	<p><b><i>Protect and enhance the high quality natural and built Environment including landscape and townscape character and particularly the protection of the High Weald AONB.</i></b></p> <p>The effects of the Plan Strategies on this SA Objective are generally beneficial. The Environment section leads with the management of the high quality built and natural landscape character and seeks to place high quality design centrally in the planning process.</p>
16	<p><b><i>Reduce waste generation and disposal, and achieve the sustainable management of waste</i></b></p> <p>Even with high levels of sustainable construction and an effective development distribution the level of development proposed will result in increased numbers of households and businesses and consequently increased waste generation.</p>

1.2.5 Where appropriate, measures designed to offset negative effects of the Strategies (mitigation measures) are proposed and can be viewed in Chapter 7.

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

- 1.3.1 The SA process has investigated the likely significant environmental and sustainability impacts of the options and strategies presented in the Core Strategy. A range of impacts has been identified. The assessment has therefore provided a check on sustainability as envisaged by government guidance. The SA process has highlighted where options may be ambiguous or in themselves insufficient and this has led to clarification and careful rewording to improve them from a sustainability perspective.
- 1.3.2 The SA process has been influential in informing the development of the Core Strategy. The iterative nature of the process of developing the Core Strategy has allowed the SA to input at various stages and highlight how the Plan can be made more sustainable.
- 1.3.3 The ultimate effectiveness of the DPD from the perspective of sustainable development will depend on an effective partnership between Rother District Council, prospective developers, infrastructure providers and the community at large.

### **1.4 How to Comment on the report**

- 1.4.1 There is the opportunity to comment on this SA as part of the consultation on the [Focused Amendments to the Proposed Submission Core Strategy](#). [Interested parties may comment on the 'focused amendments' to the SA \(the purple text in this document\) via comments on the Focused Amendments to the Proposed Submission Core Strategy. Comments should therefore explain how they consider the SA amendments impact upon the Core Strategy.](#)
- 1.4.2 If possible please complete this online, as this will help the Council efficiently administer the consultation. Please visit the website for step-by-step instructions.
- 1.4.3 For further enquiries please contact Senior Planning Officer Roger Comerford on 01424 787639 or email [roger.comerford@rother.gov.uk](mailto:roger.comerford@rother.gov.uk).

## **2 INTRODUCTION**

### **2.1 Purpose of SA and SA Report**

- 2.1.1 Under the Planning and Compulsory Purchase Act 2004, Sustainability Appraisal (SA) is mandatory for Development Plan Documents (DPDs). The purpose of SA is to promote sustainable development through better integration of sustainability considerations into the preparation and adoption of plans. SA is an integral part of good plan making and should not be seen as a separate activity. It is an iterative process that identifies and reports on the likely significant effects of the plan and the extent to which implementation of the plan will achieve the social, environmental and economic objectives by which sustainable development can be defined.
- 2.1.2 This SA accompanies the 'Proposed Submission Core Strategy' presented to Rother's Full Council in June 2011. It updates the 'Initial Sustainability Appraisal Report' which was published alongside the previous version of the Core Strategy – the 'Consultation on Strategy Directions' in November 2008. This was preceded by the December 2007 Scoping Report. The SEA Directive Requirements (as outlined below in 2.2) are therefore met in all three documents - in this document, in the Initial SA and in the SA Scoping Report.

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

- 2.2.1 In summer 2001, the European Union legislated for Strategic Environmental Assessment (SEA) with the adoption of Directive 2001/42/EC on the Assessment of the Effects of Certain Plans and Programmes on the Environment (the 'SEA Directive'). The Directive applies to a range of UK plans and programmes, including DPDs.
- 2.2.2 The SEA Directive calls for an Environmental Report "identifying, describing and evaluating the likely significant environmental effects of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme".
- 2.2.3 Government Guidance<sup>1</sup> is intended to integrate the requirements of the SEA Directive into the SA process. To comply with the Directive, authorities are obliged to report on the environmental impacts of various alternatives considered before the plan is adopted, and the guidance calls for the SA Report to incorporate the elements of Environmental Report required by the Directive.

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<sup>1</sup> [PAS 'Plan Making Manual \(2009\) and](#) ODPM Guidance: 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents Guidance for Regional Planning Bodies and Local Planning Authorities' November 2005



2.2.4 The SEA Regulations set out a legal assessment process that must be followed. In light of this, Table 2.1 sets out the relevant requirements of the SEA Regulations and explains how these have been satisfied (or will be satisfied). In particular, the SEA Regulations require the preparation of an 'Environmental Report' on the implications of the plan or programme in question. This report fulfils this requirement.



**Table 2.1 SEA Directive Requirements**

<b>Requirement</b>	<b>Where met</b>
Contents and main objectives of plans and programmes that may affect the plan	Ch 3 (and initial SA and Scoping Report)
Relevant aspects of the current state of the environment and its likely evolution without the implementation of the plan	Ch 3 (and initial SA and Scoping Report)
The environmental characteristics of the areas likely to be significantly affected	Ch 3 (and initial SA and Scoping Report)
Any existing environmental problems (issues) in particular those relating to areas designated under the Habitats and Birds Directives	Ch 3 (and initial SA and Scoping Report)
The environmental protection objectives which are relevant to the plan or programme, and the way those objectives have been taken into account in its preparation	Ch 3, Ch6 (and initial SA and Scoping Report)
The likely significant effects on the environment (and economic and social impacts)	Ch 5 & 6 (and initial SA and Scoping Report)
The measures envisaged to prevent, reduce and as fully as possible offset any significant effects on the environment	Ch 7 (and initial SA and Scoping Report)
An outline of the reasons for selecting the alternatives dealt with	Ch 5 (and initial SA and Scoping Report)
A description of how the assessment was undertaken, any problems, etc.	Ch 3, 4, 7 (and initial SA and Scoping Report)
A description of the measures envisaged concerning monitoring	Ch 8

## 2.3 Plan objectives and outline of contents

- 2.3.1 The Core Strategy DPD of the LDF sets out the overall approach which the Council, working with its partners in the local and regional community, will use to guide and manage the future use and development of land to improve and protect the District's environment. The Core Strategy spatial vision is presented in the following box:

### ***Vision for Rother in 2028***

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

There is a strong commitment to a more sustainable, low carbon future and adapting to climate change. There is sensitive stewardship of environmental resources and conservation of the area's outstanding environmental and cultural assets.

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

Improved economic and social well-being has been facilitated by better access to jobs and services, in both urban and rural areas, and improved connectivity with the rest of the region, including through effective telecommunications networks.

Development and change has contributed significantly to meeting local needs and aspirations, having responded positively to the district's circumstances, as well as to regional and sub-regional imperatives.

There has been a notable improvement in economic conditions in the coastal towns of Bexhill and Rye as a result of a strong focus on regeneration in the 'Sussex Coast' sub-region, notably through close working with neighbouring Hastings.

Bexhill has retained and strengthened its distinct identity and become one of the most attractive places to live on the south coast - attractive to families, the young and older people alike. It is the main focus of development in the district, and this continues to enable improvements in the supply of jobs and services.

Rye has improved its economic and social circumstances whilst fully respecting and sensitively managing its historic character, vulnerability to flooding and ecologically important setting. It maintains a strong tourism sector and Port activities.

The inland and essentially rural areas of Rother, falling mainly within the High Weald AONB, retain their essential local character.

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

The character and diversity of villages has also been retained. They are vibrant and inclusive, having evolved organically in a manner sensitive to their surroundings.

The countryside continues to be protected for its intrinsic value as well as being more accessible and economically active, while change is carefully managed to respect its character.

2.3.2 The spatial and strategic objectives are detailed below. They are labelled numerically in the SA using the code SO for Spatial Objectives and CO for Cross-cutting Objectives. This is to facilitate the presentation of the assessment matrices documented later in the report.

**Table 2.2 Evolution of Strategic Spatial Objectives**

	<b>Strategic Spatial Objectives at Strategy Directions</b>	<b>Strategic Spatial Objectives at Proposed Submission</b>
<b>Overall Spatial Strategy</b>	<b>SO1</b> To achieve a pattern of activity and development that responds positively to the South East Plan and the area's particular local circumstances and environmental resources in contributing to the Community Strategy and the Spatial Vision	<i>To achieve a pattern of activity and development that contributes to the Sustainable Community Strategy and the 'Spatial Vision', and responds to local circumstances/environmental resources.</i>
<b>Bexhill and Hastings Fringes</b>	<b>SO6</b> To secure a more prosperous future for the Hastings and Bexhill area. Economic regeneration and growth will be generated through joined up working concentrating on: a) the provision of high quality education opportunities, skills training and economic development b) social regeneration c) strategic physical and environmental projects and programmes	<i>Sub-divided into Bexhill and Hastings Fringes (although there is now a shared vision for the Hastings and Bexhill areas)</i> <b>Bexhill</b> <i>To strengthen the identity of Bexhill and for it to become one of the most attractive places to live on the south coast, attractive to families, the young and elderly alike, within an integrated approach to securing a more prosperous future for the Bexhill and Hastings area.</i> <b>Hastings Fringes</b> <i>To provide attractive and accessible fringes of Hastings, consistent with environmental designations.</i>
<b>Bexhill</b>	<b>SO2</b> To strengthen the identity of Bexhill and for it to become one of the most attractive places to live on the south coast, attractive to families, the young and elderly alike, within an integrated approach to securing a more prosperous future for the Bexhill and Hastings area	<i>To strengthen the identity of Bexhill and for it to become one of the most attractive places to live on the south coast, attractive to families, the young and elderly alike, within an integrated approach to securing a more prosperous future for the Bexhill and Hastings area.</i>

<b>Rye</b>	<b>SO4</b> To improve the economic and social well-being of Rye, including in relation to its market town role, tourism and the Port of Rye, whilst fully respecting and sensitively managing its historic character, vulnerability to flooding and ecologically important setting	<i>To improve the economic and social well-being of Rye, as well as maintaining a strong tourism sector and Port activities, whilst fully respecting and sensitively managing its historic character, vulnerability to flooding and ecologically important setting.</i>
<b>Battle</b>	<b>SO3</b> To support the market town and tourist centre role and character of Battle and conserve its historic core and setting	<i>To support the market town and tourist centre role and character of Battle, and conserve its historic core and setting.</i>
<b>Rural Areas</b>	<b>SO5</b> to meet local needs and promote vital, viable and support vibrant, mixed communities in the rural areas whilst giving particular attention to the economic, ecological, public enjoyment and intrinsic value of the countryside	<i>‘To meet local needs and support vibrant and viable mixed communities in the rural areas, whilst giving particular attention to the social, economic, ecological and intrinsic value of the countryside.’</i>
<b>Sustainable Resources Management</b>	<b>N/A</b>	<i>To mitigate and adapt to climate change impacts, and to use natural resources efficiently.</i>
<b>Communities</b>	<b>CO1</b> To continue to support, and further develop, vibrant, safe, balanced and inclusive communities.	<i>To continue to support, and further develop, vibrant, safe, balanced, inclusive and active communities.</i>
<b>Environment</b>	<b>CO2</b> To maintain the high quality and improve the long term stewardship of the natural and built environment, with full regard to potential future consequences of climate change	<i>stewardship, of the natural and built environment, with full regard to potential To maintain the high quality, and improve the long term stewardship, of the natural and built environment, with full regard to potential future consequences of climate change.</i>
<b>Housing</b>	<b>N/A</b>	<i>To provide housing in a way that supports local priorities and provides choice, including for affordable housing.</i>

<b>Economy</b>	<b>CO3</b> To secure sustainable economic growth for existing and future residents, and provide greater prosperity for all	<i>To secure sustainable economic growth for existing and future residents and provide greater prosperity and employment opportunities for all.</i>
<b>Transport and Accessibility</b>	<b>CO4</b> To provide a higher level of access to jobs and services for all ages in both urban and rural areas and improve connectivity with the rest of the region	<i>To provide a higher level of access to jobs and services for all ages in both urban and rural areas, and improve connectivity with the rest of the region.</i>
<b>Implementation and Monitoring Framework</b>	<b>CO5</b> To ensure that the Strategy is robust in terms of ensuring effective and timely delivery of development and infrastructure	<i>N/A - The SO is not carried through to the Proposed Submission Core Strategy as it was concluded that the Implementation chapter does not relate to a component of the vision, but rather to the process of achieving it.</i>

### **3 SUSTAINABILITY BACKGROUND**

#### **3.1 Introduction**

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

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

- 3.2.1 Links with other plans and programmes were originally outlined in the SA Scoping Report for the Rother Local Development Framework, which is available on the Council's web-site.
- 3.2.2 Given the intervening period between the second revision of the Scoping Report and the current time, the list of links has been updated in Appendix [4 7](#) of this Final Sustainability Appraisal.
- 3.2.3 The Initial Sustainability Appraisal Report (November 2008) contained some textual updates regarding key policies and programmes that had been published subsequent to the second revision of the Scoping (namely a new PPS12 called *Creating strong, safe and prosperous communities through Local Spatial Planning* and amended Local Development Regulations: The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008).
- 3.2.4 ~~It is therefore also necessary to add some~~ [Further](#) textual updates regarding key policies and programmes ~~that had been published subsequent to the Initial Sustainability Appraisal Report (November 2008), as~~ [are](#) outlined in the following sections 3.3 and 3.4;

### 3.3 New Strategies, Plans and Programmes and their Implications

#### National Level

##### CLG 'Decentralisation & Localism Bill' (2010)

- 3.3.1 The Localism Bill was introduced in December 2010 and is expected to be enacted in November 2011.
- 3.3.2 It is one part of a wider philosophy that the new coalition government has adopted, spanning more than just the planning system. A central idea is that of 'Big Society' which is a broad vision that crosses a range of public services, when Whitehall and centralised decision-making will be reduced and communities 'empowered'. At its core, the Big Society is a vision to create a nation grounded on an ethic of volunteerism, where local decisions are taken by local people, with a shrinking of the state.
- 3.3.3 For planning, the Big Society has come to be defined by "Localism", a new word suggesting that planning decisions will originate from local rather than national policy. This process has started with the end of nationally set targets through Regional Spatial Strategies, giving local authorities the power to consult and set their own. It means a greater emphasis on public participation in planning applications and in some cases, an end to planning applications altogether.
- 3.3.4 The vision for Localism was spelt out in two green papers published whilst the conservatives were still in opposition: 'Control Shift' and 'Open Source Planning'. The Bill represents the realisation of the vision spelt out in these papers. Part 5 of the Bill deals with planning. Some of the key points are as follows;

##### *Abolition of Regional Spatial Strategies*

- 3.3.5 The Bill will formally abolish Regional Spatial Strategies (RSSs) once enacted, superseding a High Court victory by CALA Homes in relation to their premature 'abolition'. RSSs will be scrapped once the Bill receives Royal Assent and becomes law. In the interim, the legal challenge continues. Further discussion of the implications of the abolition of the South East plan can be found in Section 3.4.6

##### *Neighbourhood Planning*

- 3.3.6 Under Schedule 9 of the Bill, parish / town councils and local community groups will have the power to apply Neighbourhood Development Orders and Neighbourhood Development Plans. The plans set out the policies for development for a particular area, whilst the orders grant planning permission, enabling town and parish councils (or, in their absence, local community groups) to become decision-making bodies.
- 3.3.7 Chapter three of the Bill states that the charges relating to neighbourhood planning will be payable on delivery, rather than on submitting an application.
- 3.3.8 This presents an opportunity for developers to work with local community groups and town and parish councils.

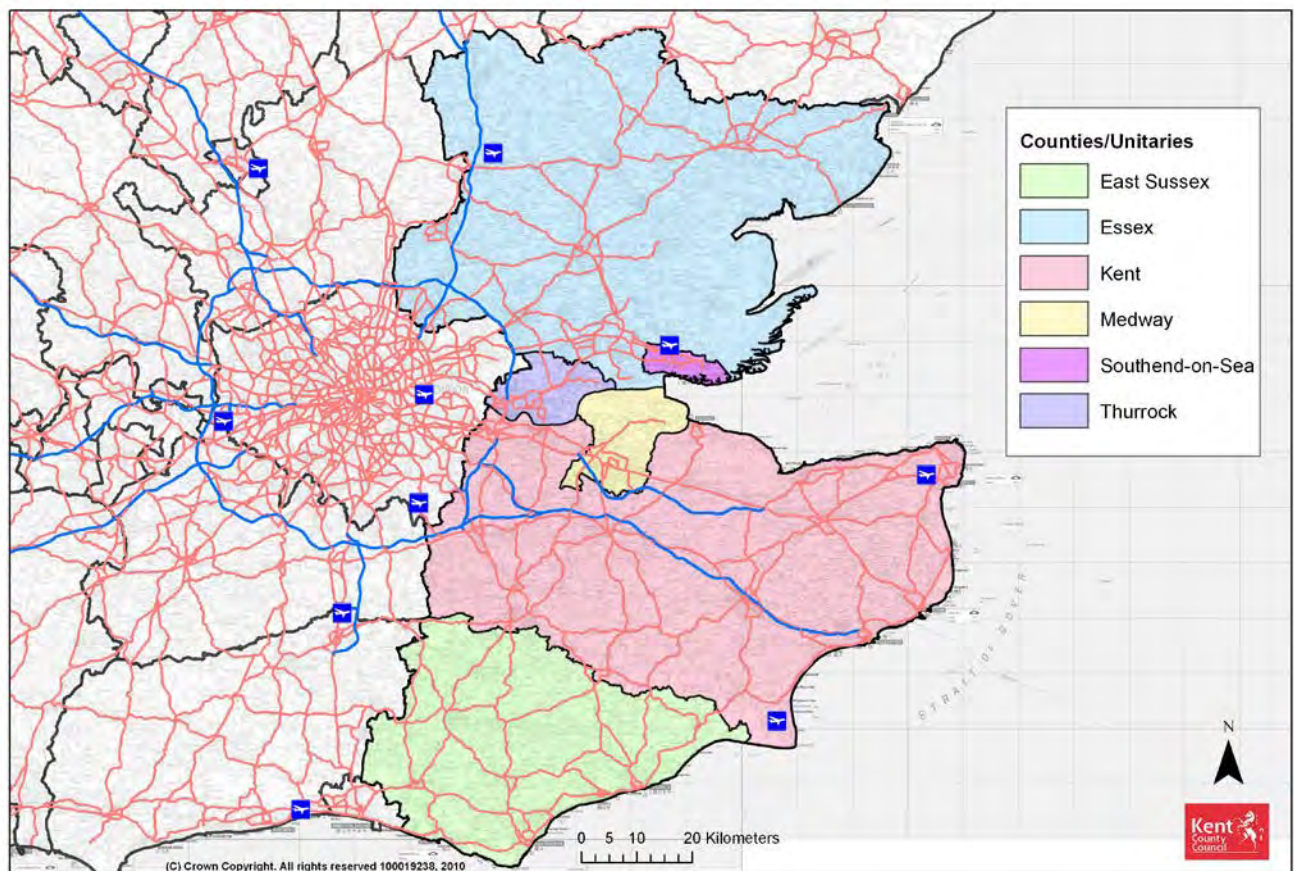


- 3.3.9 Other points of significance in the Localism Bill require a 'duty to cooperate', a requirement for transparent Local Development Schemes (LDSs) and a requirement that Councils will need to publish five-year land supply and other targets at least annually. Planning Inspectors can still make comments on plans, but the local authority is not bound to follow them.

#### Introduction of Local Enterprise Partnerships

- 3.3.10 Another immediate change the new government made was to axe Regional Development Agencies (RDAs). These were replaced by [Local Enterprise Partnerships](#), set out in the recently published white paper: Local growth: realising every place's potential.
- 3.3.11 Local Enterprise Partnerships are locally-owned partnerships between local authorities and businesses. The intention is that they will play a central role in determining local economic priorities and undertaking activities to drive economic growth and the creation of local jobs. They will also be a vehicle in delivering Government objectives for economic growth and decentralisation, whilst also providing a means for local authorities to work together with business in order to quicken the economic recovery.
- 3.3.12 Rother District Council is to be included within a new LEP, the 'Kent, Greater Essex and East Sussex Local Economic Partnership' to be fully implemented during 2011. It will include councils and businesses from the three counties of Kent, Essex and East Sussex and the three Unitary authorities of Medway, Southend on Sea and Thurrock. Its aim is to focus on driving forward prosperity by creating the right environment for growth. The LEP will use its scale to secure maximum private/public sector leverage, provide capacity for devolution of powers, public funding and programmes and generate real impetus for economic growth.
- Bring forward key locations for job creation
  - Focus on nationally significant transport links needed to support growth
  - Promote investment in our cities and towns and in our rural communities (including rural broadband)
  - Support inward investment and job creation
  - Set a new, streamlined framework for business support
  - Ensure that businesses have the skilled workforces that they need to compete, building a new relationship between our seven universities, colleges, businesses and local authorities

## Map of Kent, Greater Essex and East Sussex Local Economic Partnership



### New Homes Bonus Incentive scheme

3.3.13 The New Homes Bonus scheme was published for consultation in November 2010 and the Final Scheme Design was published in February 2011. The first cash payments through the New Homes Bonus, totalling almost £200million, were announced on 4 April 2011. The scheme seeks to encourage authorities to approve the development of housing in the wake of the revocation of Regional Spatial Strategies by matching the council tax raised on each new property developed for six years. The intention is that Councils and communities will work together to decide how to spend the extra funding - whether council tax discounts for local residents, boosting frontline services like rubbish collection or providing local facilities like swimming pools and leisure centres.

### HM Treasury and Dept of Business, Innovation & Skills Policy Statement 'The Plan for Growth' (March 2011)

3.3.14 Coinciding with March 2011 Budget, the Treasury issued 'The Plan for Growth'. It announced the intention to reform the planning system radically and fundamentally, stating that the Government will:

- ☐ introduce a powerful new presumption in favour of sustainable development, so that the default answer to development is 'yes';
- ☐ localise choice about the use of previously developed land, removing nationally imposed targets while retaining existing controls on greenbelt land;
- ☐ produce a shorter, more focused and inherently pro-growth National Planning Policy Framework (NPPF) to deliver more development in suitable and viable locations;
- ☐ set clear expectations that with immediate effect local planning authorities and other bodies involved in granting development consents should prioritise growth and jobs, through a Written Ministerial Statement by the Secretary of State for Communities and Local Government on 23 March 2011;
- ☐ introduce new powers so that businesses are able to bring forward neighbourhood plans and neighbourhood development orders;
- ☐ bring forward proposals to extend Permitted Development rights, and will consult on proposals to make it easier to convert commercial premises to residential;
- ☐ pilot a new land auction model, starting with public sector land; and
- ☐ ensuring all planning applications and appeals will be processed in 12 months and that major infrastructure projects will be fast-tracked.

3.3.15 It remains to be seen how the planning principles outlined in 'The Plan for Growth' such as the default answer to development of 'yes', will work alongside the Localism Bill empowering local communities in decision making.

### Key Strategies, Plans and Programmes - County Level

#### ESCC 'Draft Strategic Open Space Study' (2011)

3.3.15a The study audited a range of type of open space including parks and gardens, woodlands and scrubland, green corridors, outdoor sports facilities, children's play areas, amenity greenspace within housing developments, allotments, coastal areas and cemeteries and churchyards. Local standards for quality, quantity and accessibility of provision were set enabling shortfalls in provision to be identified.

3.3.16 For open space of county wide significance, this study answers the questions;

- ☐ How much do we have?
- ☐ What standards exist to help us to decide how much we need, and how do we compare?
- ☐ How do we achieve an appropriate standard?

3.3.17 The study shows that East Sussex has over 15,000 ha of strategic open space i.e. single or well connected areas of 20 ha or more, open to the public at no charge, and where visitors have access to much of the area.

3.3.18 The study identifies deficiencies of 500ha sites within 10km of our homes, including a wide band of deficiency exists between Rye to the east, through Hastings and Bexhill, Heathfield, and down to Lewes.

3.3.19 The study identifies means to address the quantity deficiency through the creation of Pebsham Countryside Park (PCP), which extends to over 600 ha between Bexhill and Hastings, a further 137,000 people will reach the 500 ha standard and bring the County total to 87% of all residents (PCP also improves the 100 ha and 20 ha performance).

3.3.20 In addition the study demonstrates that with the current work to improve access management at Rye Harbour Nature Reserve, the proportion rises to 90% of residents.

East Sussex Environment Strategy Group Draft East Sussex Environment Strategy  
Nov 2010 (Final version to be agreed by ESSP around March 2011)

3.3.21 The draft Environment Strategy has been developed by the East Sussex Environment Strategy Group, a network of organisations and individuals, who have decided to work together to help deliver the environmental vision for the county set out in the Sustainable Community Strategy, *Pride of Place*.

3.3.22 The Strategy aims to achieve the following outcomes:

- improved quality of life and health outcomes by creating a healthier, better quality environment which people make use of as part of more active lifestyles
- increased the understanding of the role which the environment plays in the economy of East Sussex and supported the creation of jobs and prosperity through environmentally sustainable economic growth
- made East Sussex a more resource efficient county, which meets more of its own needs
- conserved and enhanced the landscape, built and historic environment of East Sussex so that it retains its unique character
- conserved existing areas of high nature conservation quality, expanded, buffered and linked these areas, and made the wider landscape more permeable to wildlife, in order to reverse biodiversity loss in East Sussex
- reduced the contribution that East Sussex makes to greenhouse gas emissions and made the county more adaptive to climate change
- increased public awareness and recognition of the environment and inspired greener behaviours
- influenced other strategies and policies to help achieve these outcomes and delivered more efficient and effective environmental protection and enhancement through joint working

3.3.23 Once the final strategy has been agreed the Environment Strategy Group will develop a set of indicators which can be used to measure progress against the above outcomes.

ESCC 'Climate Change Strategy' (Sept 2009)

3.3.24 ESCC developed this strategy to guide work on tackling climate change across East Sussex. The overall aim of the Climate Change Strategy is to reduce greenhouse gas



emissions and adapt to climate change, and to enable individuals and organisations to do the same.

3.3.25 The aim is to do this by:

- bringing climate change into the mainstream of all that we do
- engaging with new and existing partner organisations and the public
- reducing our greenhouse gas emissions
- creating a community which can adapt to the changing climate.

3.3.26 ESCC are also developing an Action Plan that sets out how we will meet the Climate Change Strategy targets.

#### East Sussex County Council 'Local Transport Plan 3 – 2011 to 2026'

3.3.27 The third Local Transport Plan (LTP3) shapes the future of transport in East Sussex from 2011 to 2026 with the aim of making transport greener, safer and more accessible for everyone. Views have been sought from local residents, businesses and anyone interested in shaping the future of transport in East Sussex.

### **3.4 Changes to Other Strategies, Plans and Programmes and their Implications**

#### Bexhill to Hastings Link Road<sup>2</sup>

3.4.1 At the time of the last version of the Core Strategy (Consultation on Strategy Directions) in late 2008, the expectation was that the proposed link road would proceed and be opened by the end of 2012. A significant volume of planned housing and business development over the plan period in Bexhill and the Hastings Fringes was dependent on the Link Road.

3.4.2 However, In October 2010, Transport Secretary Philip Hammond announced that the DfT was intending to conduct some further analysis on a number of schemes which it had placed in what it described as the 'development group' - and invite best and final funding bids from this pot. The Link Road was one of several schemes in this pot. The decision on funding will be made at the end of 2011.

3.4.3 Local commitment to the scheme remains strong. The Local Transport Plan 3 states that "this scheme is regarded as essential to the continuing regeneration of the area and is the top priority for the county as highlighted in our submission with Greater Essex, Medway and Kent. .... work is continuing to submit the best offer possible related to funding." The reference to "Greater Essex, Medway and Kent" refers to the Local Economic Partnership (LEP).

3.4.4 In the meantime, the Core Strategy needs to reflect this uncertain situation.

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<sup>2</sup> For the most up-to-date position regarding the Link Road see:  
<http://www.eastsussex.gov.uk/roadsandtransport/bexhillhastingslinkroad/default.htm>

### South East Plan

- 3.4.5 Using delegated or secondary legislation, Eric Pickles, newly named as Secretary of State for Communities and Local Government, wrote to local authorities in June telling them, in effect, that Regional Spatial Strategies were no more. The decision to revoke the South East Plan was subsequently declared illegal following a High Court challenge by CALA Homes. Following the CALA Homes ruling, Pickles wrote to all authorities stating that the revocation of RSSs should be given "material consideration" when determining planning applications, a comment which was the subject of further proceedings. However, once the Localism Bill is enacted, it will supersede all previous High Court rulings.
- 3.4.6 The South East Plan contains wide ranging policies and covers many subjects. However, most significantly it provided local authorities with their housing numbers. The CLG advised that Councils may wish to go back refer to their "option one" figures until new targets could be consulted upon.
- 3.4.7 The consequences of the likely removal of the regional plan for Rother's Core Strategy is that the onus is now on Rother District Council to justify its own housing numbers based upon sound evidence. It will also mean a raft of regional policy guidance has effectively been removed in the medium to long term.

### PPS 3 Housing (2010)

- 3.4.8 The updated PPS3 introduced two key changes. Firstly support for the practice known as "garden grabbing", developing in the gardens of existing houses, was effectively curtailed by removing the classification of gardens as "previously developed land" so that they will no longer be designated 'Brownfield'. Secondly, the minimum housing densities (30 dwellings per hectare) were abolished.

### Updated PPG13 (DfT, January 2011)

- 3.4.9 On 3rd January 2011, the Government issued a revised Planning Policy Guidance Note 13 on Transport (PPG 13). Only paragraphs 49 to 56 of the note have been updated. The key changes to PPG13 are removal of:
- a) restrictions on parking spaces in residential developments; and
  - b) the requirement to set high parking charges intended to encourage walking, cycling and the use of public transport. Councils will now be able to set parking policies they believe are right for their own areas. This could, for example, include encouraging people to travel by car into town centres to use local shops and improve the economic vitality of the area.

### Consultation Paper on a new PPS: Planning for a Natural and Healthy Environment (2010)

3.4.10 In 2010, the government published for consultation a new draft Planning Policy Statement (PPS) entitled 'Planning for a Natural & Healthy Environment'. The new PPS covers planning for the natural environment, green infrastructure, open space, sport, recreation and play. It is intended to replace PPS9 'Biodiversity & Geological Conservation', PPG17 'Planning for Open Space, Sport & Recreation', PPS7 'Sustainable Development in Rural Areas' (but only the parts relating to landscape protection, soil and agricultural land quality and forestry) and PPG20 'Coastal Planning' (but only the parts relating to coastal access, heritage coast and the undeveloped coast). The Government invited feedback on 10 questions as part of the consultation.

3.4.11 The key policy features of the new PPS are a new policy requirement for the delivery of green infrastructure (the network of green spaces comprising of open spaces, parks, wildlife corridors, rivers etc.), continued support of the need to assess and make adequate provision for sport, recreation and children's play, and a requirement to consider the wider recreational benefits of floodlighting to the community as well as the impact on local amenity.

### **3.5 Description of the social, environmental and economic baseline characteristics and the predicted future baseline**

3.5.1 The description of the social, environmental and economic baseline characteristics and the predicted future baseline can be found in Section 3 of the SA Scoping Report. The council has updated this information as new statistics and data have become available. The updated baseline data in Appendix 1 of this report.

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

### **3.6 Location and Geography**

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

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

### **3.7 People – socio-economic characteristics**

3.7.1 Some 89,200 people live in Rother. Their age structure shows a notably higher proportion of elderly compared to county, regional and national averages. This also varies across the District, with the highest proportion of people aged 65+ in Bexhill (35%) and at Fairlight (40%).

3.7.2 There is a relatively low proportion of ethnic minority groups in the District.

- 3.7.3 Average household income, which is an indicator of spending power, is relatively low in Rother, being below the county average and well below the regional average. This may partly reflect the high proportion of retired residents.
- 3.7.4 The Government's most recent (2010) compilation of indices of social economic characteristics, the Index of Multiple Deprivation' (IMD) demonstrates worsening deprivation relative to other areas. In 2010, it ranks Rother 139th "worst" of 354 local authority areas, rising from 191<sup>st</sup> in 2004. Pockets of deprivation include Bexhill Sidley, Bexhill Central, Rye Nw and Camber. As of 2010, Rother now has 2 SOAs in the worst 10% nationally (for the first time) in Sidley.
- 3.7.5 Hastings has experienced a similar decline, ranked 19<sup>th</sup> in 2010 from 39th most deprived district in the country in 2004.
- 3.7.6 However, Rother is a relatively safe place to live, with noticeably lower levels of Recorded crimes than both the region and country as a whole. Despite this the proportion who feel safe in Rother at night is only about 61%, which is why the SA objective 3 talks about 'reducing the fear of crime' as well as actual crime. On a positive note, there is increasing satisfaction with the local area as a place to live with 86% of residents 'very or fairly satisfied'.

### **3.8 Education, skills and employment**

- 3.8.1 Educational achievement, at GCSE level, of local students is relatively low in both Rother. There is also a high proportion of people with no qualifications, suggesting high levels of social exclusion. On the positive side Rother has a reasonable proportion of people qualified to at least level 4, when compared to the County and nation.
- 3.8.2 This is also reflected in the types of jobs people do, with fewer than the national average in managerial and professional posts, although higher levels are found in some rural areas, notably those with closer links to Tunbridge Wells and London.
- 3.8.3 Some 23,200 people are employed in Rother. This compares with a total workforce of 33,800, meaning that there is a net out-flow of commuters. In fact, some 40% of Rother residents work outside the district.
- 3.8.4 The rationale for this is evidenced by the difference between average earnings of residents (£502) and people working in Rother (£411).
- 3.8.5 Of the jobs in Rother, the most significant sectors are public services followed by financial and business services and retail/distribution. About 10% of jobs are in manufacturing and 3.3% in agriculture/forestry/fishing.
- 3.8.6 Smaller firms (10 or less employees) predominate, accounting for 89% of business units. Not untypical for a rural area, there are many self employed people.
- 3.8.7 Unemployment rates (measured by benefit claimants) are currently low, broadly comparable with the wider area. However, this has not always been the case and in the early 1990s the eastern part of the District and parts of Bexhill were very much higher than the regional average.



### **3.9 Housing**

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

### **3.10 Environment**

- 3.10.1 Rother has outstanding environmental qualities in its landscape, wildlife habitats, built and cultural heritage. There are ongoing national and international obligations to conserve and enhance these. Furthermore, they are integral to the character of the area.
- 3.10.2 The state of the environment is generally good but there are pressures upon it. The High Weald is subject to continuing financial pressures on agriculture and land management, as well as from development.
- 3.10.3 Two of the SSSIs in the District are defined as in “unfavourable condition”; Maplehurst Wood and Winchelsea Cutting. A tiny proportion (0.5%) of Pevensey Levels SSSI has been destroyed. A full condition summary of all Rother’s SSSIs can be found in Appendix 1.
- 3.10.4 River water quality is virtually all “fairly good” – “very good” but abstraction is increasing. All Rother’s beaches meet EC Directive on bathing water quality, although only Winchelsea Beach meets its more stringent guideline standard.
- 3.10.5 The 2007 ‘Open Space, Sport and Recreation Study’ noted that there are a total of 138 natural and semi-natural sites in the District, totalling 1321.32ha. As to be expected the rural areas have the highest total hectares. Existing provision of natural and semi-natural sites in Rother District equates to 15.53ha per 1,000 population. The average quality score for sites in the District is 51%. This is a relatively low score compared to other typologies and other local authorities. This score can be largely explained by the

large number of sites outside of Council ownership whereby the Council are unable to control any quality issues.

### 3.11 Difficulties in collecting data and limitations of the data

3.11.1 The SA/SEA guidance recognises that it may be necessary to revisit the baseline data, to keep the information up-to-date and to identify new information and issues as they emerge. In light of this a new baseline table has been prepared (Appendix 1 of this Report) in line with the indicators proposed in the SA Framework.

3.11.2 Inevitably there are gaps in data provision, although many of the gaps identified at Initial SA stage have since been addressed, including;

- County comparator for the percentage of students 16+ in full time education
- County comparator for the number of households in fuel poverty
- County comparator for the percentage of new development within 30 minutes of public transport
- County comparator for the percentage of retail, office, leisure development in town centres
- Background levels of main air quality pollutants
- Permissions granted contrary to EA advice
- County comparator for vacant private sector dwellings returned to occupancy
- Applications received for renewable energy on existing development
- % new development with renewable energy generation

3.11.3 There are only three key areas / topics indicators for which data for Rother is still currently lacking data. These are summarised in Table 3.1 below.

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

<b>Business &amp; Employment Accessibility</b>
County comparator for the loss of employment land to residential
<b>Flooding</b>
County comparator for properties at risk from flooding
<b>Water</b>
Water consumption per capita

### 3.12 Main social, environmental and economic issues and problems identified

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

**Table 3.2** Key Sustainability Problems

Sustainability Issue	Supporting Evidence
<b>Environment</b>	
Waste & Recycling	<input type="checkbox"/> Rother Community Plan priority to reduce the amount of waste going to landfill <input type="checkbox"/> National recycling targets <input type="checkbox"/> PPS10 Planning for Sustainable Waste Management; <input type="checkbox"/> East Sussex and Brighton and Hove Waste Local Plan <input type="checkbox"/> <a href="#">RDC Low Carbon &amp; Renewable Potential Study</a>
Maintaining Landscape Quality	<input type="checkbox"/> Community Strategy for East Sussex priority <input type="checkbox"/> High Weald AONB Management Plan; Rother Local Plan <input type="checkbox"/> The Historic Environment: A Force for our Future <input type="checkbox"/> <a href="#">ESCC Landscape Assessments</a>
Sustaining Biodiversity	<input type="checkbox"/> PPS9 Biodiversity and Geological Conservation <input type="checkbox"/> Rother Environmental Policy Statement <input type="checkbox"/> Biodiversity Action Plan for Sussex <input type="checkbox"/> <a href="#">HRAs – Hastings Cliffs, Pevensey Levels, Dungeness to Pett Level</a> <input type="checkbox"/> <a href="#">ESCC Environment Strategy</a> <input type="checkbox"/> <a href="#">RDC Green Infrastructure Study</a>
Preserving Historic and Built Environment Quality	<input type="checkbox"/> Rye, Battle, Winchelsea, Sedlescombe, Bexhill Conservation Area Appraisals <input type="checkbox"/> PPS5 Planning for the Historic Environment <input type="checkbox"/> The Historic Environment: A Force for our Future <input type="checkbox"/> Draft East Sussex Environment Strategy <input type="checkbox"/> <a href="#">RDC Conservation Area Appraisals</a>
Climate Change	<input type="checkbox"/> Community Strategy for East Sussex priority <input type="checkbox"/> PPS1 Creating Sustainable Communities and the new Supplement to PPS1; PPS25 Development & Coastal Change <input type="checkbox"/> Strategy for Energy Efficiency and Renewable Energy <input type="checkbox"/> <a href="#">RDC Strategic Flood Risk Assessment (SFRA)</a> <input type="checkbox"/> <a href="#">RDC Low Carbon &amp; Renewable Potential Study</a>
Water Quality	<input type="checkbox"/> Water Framework Directive <input type="checkbox"/> PPS23 Planning and Pollution Control <input type="checkbox"/> Rother Environmental Policy Statement <input type="checkbox"/> Bathing quality at beaches
Air Quality	<input type="checkbox"/> UK Air Quality Strategy <input type="checkbox"/> PPS23 Planning & Pollution Control <input type="checkbox"/> Rother Environmental Policy <input type="checkbox"/> Mode of travel to work/high car use

<b>Social</b>	
Community Safety	<input type="checkbox"/> Integrated Sustainable Community Strategy for East Sussex <input type="checkbox"/> Rother Crime and Disorder Reduction Strategy <input type="checkbox"/> PPG13 Transport
Children & Young People	<input type="checkbox"/> PPG17 Planning for Open Space, Sport & Recreation <input type="checkbox"/> Sussex Learning & Skills Council Annual Plan <input type="checkbox"/> Integrated Sustainable Community Strategy for East Sussex
Culture & Leisure	<input type="checkbox"/> PPG17 Planning for Open Space, Sport & Recreation <input type="checkbox"/> Tourism and Related Sport Recreation <input type="checkbox"/> Rother Cultural and Leisure Strategy <input type="checkbox"/> Satisfaction with theatres and galleries <input type="checkbox"/> RDC Leisure Facilities Strategy <input type="checkbox"/> Draft East Sussex Strategic Open Spaces Study <input type="checkbox"/> <a href="#">RDC Green Infrastructure Study</a>
Health	<input type="checkbox"/> The Bexhill and Rother Health Improvement Action Plan <input type="checkbox"/> Population within 20 minutes of sports facility <input type="checkbox"/> Integrated Sustainable Community Strategy for East Sussex
Housing	<input type="checkbox"/> Rother Housing Strategy <input type="checkbox"/> Rother Local Plan <input type="checkbox"/> South East Plan; PPS3 Housing <input type="checkbox"/> Property price to earnings ratio <input type="checkbox"/> <a href="#">Strategic Housing Land Availability Assessment (SHLAA)</a> <input type="checkbox"/> <a href="#">Housing Market Assessment (HMA)</a> <input type="checkbox"/> <a href="#">Strategic Housing Market Assessment (SHMA)</a>
Transport & Accessibility	<input type="checkbox"/> PPG13 Transport <input type="checkbox"/> Regional Transport Strategy <input type="checkbox"/> Integrated Sustainable Community Strategy for East Sussex <input type="checkbox"/> All accessibility indicators
Deprivation	<input type="checkbox"/> South East Regional Inclusion Statement <input type="checkbox"/> Rother District Council Initial Sustainability Appraisal November 2008 <input type="checkbox"/> South East Plan <input type="checkbox"/> Rother Economic Regeneration Strategy <input type="checkbox"/> Indices of multiple deprivation <input type="checkbox"/> Percentage households in fuel poverty <input type="checkbox"/> Mean household income

<b>Economic</b>	
Education & Skills	<input type="checkbox"/> Sussex Learning & Skills Council Annual Plan <input type="checkbox"/> South East Plan <input type="checkbox"/> Integrated Sustainable Community Strategy for East Sussex <input type="checkbox"/> All education baseline indicators
Jobs	<input type="checkbox"/> Rother Economic Regeneration Strategy <input type="checkbox"/> Hastings & Bexhill Area Investment Framework Annual Performance Plan <input type="checkbox"/> South East Plan
Local Economy & Regeneration	<input type="checkbox"/> Rother Economic Regeneration Strategy <input type="checkbox"/> Hastings & Bexhill Area Investment Framework Annual Performance Plan <input type="checkbox"/> South East Plan <input type="checkbox"/> <a href="#">Hastings and Rother Employment Strategy &amp; Land Review</a> <input type="checkbox"/> <a href="#">Hastings and Rother Employment Strategy &amp; Land Review Update</a> <input type="checkbox"/> All economic indicators

### 3.13 Appropriate Assessment

- 3.13.1 The need for Appropriate Assessment is set out within Article 6 of the EC Habitats Directive 1992, and interpreted into British law by Regulation 48 of the Conservation (Natural Habitats &c) Regulations 1994 (as amended in 2007). Under these Regulations, land use plans must be subject to Appropriate Assessment if they are likely to have a significant [adverse] effect on a Natura 2000 site (Special Areas of Conservation, SACs and Special Protection Areas, SPAs). It is Government policy (as described in Planning Policy Statement 9: Biodiversity & Geological Conservation) for sites designated under the Convention on Wetlands of International Importance (Ramsar sites) to be treated as having equivalent status to Natura 2000 sites. As such, Appropriate Assessments should also cover these sites.
- 3.13.2 The Habitats Directive applies the precautionary principle to protected areas; plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. In the case of the Habitats Directive, plans and projects may still be permitted if there are no alternatives to them and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network.
- 3.13.3 In recent years the term 'Habitat Regulations Assessment' (HRA) has come into common currency to describe the entire assessment process set out in the Regulations, while the phrase 'Appropriate Assessment' is referred to that particular stage.

### **Habitats Directive 1992**

Article 6 (3) states that:

*“Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives.”*

### **Conservation of Habitats and Species Regulations 2010**

The Regulations state that:

*“A competent authority, before deciding to ... give any consent for a plan or project which is likely to have a significant effect on a European site ... shall make an appropriate assessment of the implications for the site in view of that site's conservation objectives... The authority shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site”.*

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

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

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

3.13.6 For Rother District Council Core Strategy, the Initial SA outlined some of the potential impacts in section 3.6. At this point of time, relevant HRA/AA documents now include;

- i) [Wealden & Rother Core Strategies Appropriate Assessment Hydrology Local to the Pevensey Levels September 2010](#)
- ii) [Appropriate Assessment and Air Quality Local to the Pevensey Levels Ramsar Site. A Report to Support the Appropriate Assessment for Rother, Wealden, Hastings and Eastbourne Core Strategies June 2009](#)
- iii) [Rother Core Strategy 'Habitat Regulations Assessment – Likely Significant Effects \(Hastings Cliffs SAC\)' Final report June 2011](#)
- iv) [Rother and Shepway Core Strategies 'Habitat Regulations Assessment \(Dungeness SAC, Dungeness to Pett Level SPA and future SPA extension and Ramsar site\)' Final report June 2011](#)



3.13.6a Each of the above documents, as well as the SFRA and other critical evidence studies are available the Council's website.

3.13.7 Key findings of each document are as follows

Wealden & Rother Core Strategies Appropriate Assessment Hydrology Local to the Pevensey Levels 2010

*The Pevensey Levels Ecosystem*

3.13.7a The Pevensey Levels Ramsar Wetlands has an important assemblage of species which can be affected by water quality and water levels. Species include internationally and nationally important species of plant, snail, spider, beetle and dragonfly, amongst others. The Pevensey Levels drainage network is complex and comprises pumping stations, water control structures, sluices and channels of different size. The general principle is that groundwater discharge and surface water runoff from the surrounding upland catchment area is carried across the lowland to the sea outfalls via the embanked channels (in three main river systems).

3.13.7b A condition assessment of the Pevensey Levels was conducted in 2006. The assessment identified that 67% of the designated area achieves the Public Service Agreement (PSA) target of being in either 'favourable' or 'unfavourable recovering' condition. Reasons why certain units fail to meet the PSA target include poor water quality, invasive species and inappropriate water levels. On many accounts certain units may fail for two or three of these reasons.

3.13.7c One of the main areas of concern for the conservation status of the Pevensey Levels is water quality. This is due to the potential impact that poor water quality can have on designated species. In total, there are 90 consented discharges into the Pevensey Levels.

3.13.8 The stage 1 screening assessment concluded in the screening assessments of the Core Strategy that it could not rule out a significant impact through potential adverse hydrological effects on the Pevensey Levels Ramsar site. An Appropriate Assessment was therefore required. The particular potential adverse hydrological impacts include:

- ☐ Increased surface water run-off produced by development;
- ☐ Pollutants contained in surface water run-off produced by development;
- ☐ Discharge of waste products from waste water treatment works, causing a detrimental impact on the water quality of the Pevensey Levels; and
- ☐ Increased water abstraction/ demand produced by additional development.

3.13.8a The AA in relation to hydrology was applied to both Rother and Wealden Core Strategies. It noted the requirement for 4,000 dwellings to be built in the Rother section of the 'Sussex Coast Sub-Region' between 2006 and 2026, but commented that 'Given delays in a decision on the Link Road, the above figures may reasonably be taken as the maximum likely to be pursued through the Core Strategy'.

3.13.9 The report notes that for Bexhill the main focus of planned growth is by urban extensions principally to the north-east of the town, which are outside the hydrological

catchment area of the Pevensey Levels. This will be supplemented over time by expansion onto greenfield sites to the north and west of Bexhill. Only the latter would be in the catchment of the Pevensey Levels. The precise scale and location of these will be determined through preparation of a 'Site Allocations and Development' DPD.

3.13.9a The AA noted that the direction provided by the Rother Core Strategy will result in some development within the hydrological catchment of the Pevensey Levels. The AA further commented that "Additional new development and increased populations located within the hydrological catchment area of the Pevensey Levels have the potential to impose additional pressure on the conservation status of the Pevensey Levels Ramsar site through:

- Change in hydrological conditions; and
- Deterioration of water quality."

3.13.9b Hydrology concerns the quantity, duration, rates, frequency and other properties of water flow and in relation to Pevensey Levels is central in maintaining specific designated species. The flora and fauna in the Pevensey Levels are not only dependent on the overall maintenance of water levels but also the velocity and volumes at which water is received into the watercourses, which is critical to the success of the ecosystem. The hydrology and consequently the Conservation Objectives of the Pevensey Levels are therefore potentially affected by a number of issues, including:

- An Increase in Impermeable Surfaces
- Volume of treated wastewater discharge
- Water abstraction

3.13.9c Water quality is governed by not only the quantity and type of contaminants but also the volume and velocity of the water conveying the contaminants. Changes to the water quality in the Pevensey Levels has the potential to affect the Conservation Objectives including maintaining the distribution of habitats and species and maintaining the structure, function and supporting processes of habitats supporting the species.

3.13.9d The AA commented that 'due to the complexity of wetland habitats it is not possible to predict the exact direct and indirect effects that increased surface water run-off and pollutants from new development may have on the Pevensey Levels or the extent to which the conservation features of the site could be adversely affected by future development. Any development, which increases the impermeability of land will increase surface water run-off. Development accommodated in the Pevensey Levels catchment area is likely to lead to increased run-off if unmitigated and has the potential to create a change in the hydrology of the Pevensey levels and convey pollutants to its watercourses and drainage network.' However the AA further noted that the creation of additional surface water run-off is currently controlled to a certain extent through national planning policy guidance and Building Regulations.

3.13.9e In the absence of site specific information in Rother Core Strategy (other than broad locations) the precautionary approach has been taken. Based on the precautionary principle, it is considered that any additional surface water run off would have a likely significant effect on the Pevensey Levels, with the main area of concern being the conveyance of pollutants. As an adverse effect cannot be ruled out, avoidance or



mitigation measures must be provided. This is in line with CLG guidance that the level of detail of the assessment, whilst meeting the relevant requirements of the Habitats Regulations, should be 'appropriate' to the level of plan or project that it addresses.

- 3.13.10 In terms of mitigation and avoidance techniques, the report noted that given the potential for significant effects from increased surface water run-off on the Conservation Objectives of the Pevensey Levels Ramsar Site it will be necessary for mitigation measures to be incorporated by way of a specific policy into Site Allocation DPDs to ensure that no adverse effects result.
- 3.13.11 For the regulation and remediation of increased surface water run-off /pollutants and to mitigate the loss of natural drainage patterns it was recommended that the relevant DPD include a policy which requires all new development, that creates impermeable surfaces, within the hydrological catchment area of the Pevensey Levels to incorporate suitable sustainable drainage systems (SuDS).
- 3.13.12 It was considered that through the inclusion of a policy requiring the incorporation of SuDS in any new development within the hydrological catchment area of the Pevensey Levels that the drainage regime for the Pevensey Levels will not be affected by additional surface water run-off / associated pollutants created by new development.
- 3.13.13 It was recommended for the scope of the policy to apply to both greenfield and brownfield sites and to cover **all** new development with any proposed hard surface. In other words any proposed development that would lead to an increased rate and volume of surface water run-off leaving a developed site. (This would include a proposed small-scale development such as a house extension as well as large or major developments such as proposed housing or commercial development). Both Natural England and the Environment Agency consider this approach to be acceptable.
- 3.13.13a Through an Appropriate Assessment of a Site Allocations DPD, the potential direct impacts on these features and suitable mitigation measures will be assessed and secured at this time.
- 3.13.13b In addition, the Environment Agency in accordance with the Water Framework Directive will expect to see SuDs incorporated within a proposed development should it result in an increase in surface water run-off.
- 3.13.13c No further abstraction for public water supply will be permitted in the Pevensey Levels. Therefore the impact of the new demand will not be associated with the Pevensey Levels.
- 3.13.13d The AA concluded that, if the recommendations for mitigation are followed the Rother District Council Core Strategy will not have an adverse effect on the Pevensey Levels Ramsar site.

Appropriate Assessment and Air Quality Local to the Pevensey Levels Ramsar Site. A Report to Support the Appropriate Assessment for Rother, Wealden, Hastings and Eastbourne Core Strategies June 2009

3.13.13e The Appropriate Assessment in relation to Air Quality Local to the Pevensey Levels Ramsar Site was carried out concurrently for several Sussex planning authorities (Rother, Eastbourne, Wealden and Hastings) with the intention of addressing the issue, particularly within 200m of the A259 which traverses the Levels, and the adverse changes that may occur as a result of the increase in the vehicle fleet associated with the delivery of 25,600 dwellings across the districts and boroughs to 2026.

3.13.13f The simple appraisal concluded that it seems unlikely that the additional housing to be delivered across the four districts will, even when considered 'in combination' with each-other and the other contributors to a predicted increase in vehicle movements on the A259 (such as the emerging East Sussex Waste & Minerals Development Framework) result in exceedence of the critical level or critical load for the Pevensey Levels Ramsar site, particularly when one considers the increase vehicle flows within the context of current national predictions that exhaust emissions are likely to improve over the plan period. No measures to either avoid or mitigate effects will therefore be required because the predicted increase in traffic is unlikely to cause either NOx concentrations or rates of nitrogen deposition to exceed the critical level or critical load.

3.13.13g Natural England were consulted on the report and commented that they: 'would concur with the conclusion that while there is likely to be an increase in nitrogen deposition and NOx concentrations these will still be below the Critical Levels applicable to Pevensey Levels and therefore there is unlikely to be a significant effect on the Ramsar site from the proposed levels of housing from these pollutants'.

Rother Core Strategy 'Habitat Regulations Assessment – Likely Significant Effects (Hastings Cliffs SAC)' Final report June 2011

3.13.13h The HRA noted that Hastings Cliffs are one of the finest examples of vegetated soft rock cliffs in the UK, with a diversity of cliff-face habitats. The SAC is generally considered to be in favourable condition and recreational pressures are well managed.

3.13.14 Likely Significant Effects of the Rother District Council Core Strategy were considered in this document. It noted that Rother itself will seek to deliver approximately 4,100 dwellings over a similar time period. Of these, 1,177 already have planning permission such that the actual number of currently unpermitted dwellings they are planning for is 2,923. If one assumes an average occupancy of 2.3/dwelling this could result in an additional 6,723 new residents in the district. The HRA for the Hastings Core Strategy considered the potential impact of delivery of 4,200 dwellings in Hastings, in combination with the 30,000 + to be delivered in surrounding districts (such as Rother) and which may also result in increased visits to the Country Park.

3.13.14a The HRA noted that new housing in both Rother District Council and Hastings Borough Council will inevitably increase the surrounding population and hence the potential visitor numbers. However, there are no indications that the Country Park is close to visitor capacity or that any increase in visitors cannot be managed. It was concluded that due to the access management which already occurs within the Country

Park and SAC it could be screened out. In conclusion it was felt that while Rother is likely to make a contribution to visitors within the Country Park and SAC, it is considered that impacts on this site can be screened out of the Rother Core Strategy HRA, as they have been for Hastings itself.

Rother and Shepway Core Strategies 'Habitat Regulations Assessment (Dungeness SAC, Dungeness to Pett Level SPA and future SPA extension and Ramsar site)' Final report June 2011

3.13.14b The complex of European sites located at Dungeness, Rye and Romney Marsh are collectively underpinned by the Dungeness, Romney Marsh and Rye Bay SSSI. This large area contains a wide variety of coastal habitats and is notified for its saltmarsh, sand dunes, vegetated shingle, saline lagoons, standing waters, lowland ditch systems, and basin fens. Dungeness is a shingle beach of international importance.

3.13.15 The screening exercise (contained in full in Appendix 1 [of the HRA](#)) covers all policies or preferred options within the Rother Core Strategy to determine those which can be dismissed from the assessment as being unlikely to lead to significant effects, largely due to the absence of an impact pathway. The version of the ~~pre~~ [proposed](#)-submission Rother Core Strategy that was supplied on 19/05/11 was screened.

3.13.16 Within the Rother Core Strategy a total of seven policies could not be immediately screened out as being unlikely to lead to significant effects:

- OSS1: Overall Spatial Development Strategy;
- BX3: Development Strategy (Bexhill);
- RY1: Policy Framework for Rye and Rye Harbour;
- BA1: Spatial Strategy for Battle;
- CO3: Improving Sports and Recreation Provision;
- EMP2: Business Land and Premises; and
- EMP6: Tourism Activities and Facilities.

3.13.17 The potential impacts and effects of these policies were therefore be evaluated against the European site, on a topic by topic basis (each topic relating to a particular impact pathway).

3.13.18 The Habitat Regulations Assessment stated the expectation that changes will have been made to the Rother Core Strategy by the time of submission to reflect the recommendations in their report.

3.13.19 *Port of Rye/Rye Harbour:* Amendments were recommended to various emerging drafts of Core Strategy policy regarding expansion of the Port of Rye/Rye Harbour and the need for Habitats Regulations Assessment so that high standards would need to be met to enable development to proceed. Following these amendments, it is considered that the Rother Core Strategy would have sufficient safeguards in policy/supporting text

that they would be unlikely to lead to significant effects on the Dungeness international sites through disturbance, water quality or air quality impacts or loss of supporting habitat. It was also concluded that there are unlikely to be significant effect on the international habitats through water resource abstraction (since such processes are already restricted by the EA), through coastal squeeze. There were also certain amendments recommended regarding tourism/recreation policies to ensure there are no adverse effect on the conservation status and integrity.

3.13.20 *Dungeness International Sites*: It was considered unlikely that the development proposed through the Rother Core Strategy would lead to significant effects on the Dungeness international site through coastal squeeze.

3.13.20a In terms of detailed recommendations, the HRA recommended in relation to the Port of Rye that “In order to confirm that the contribution of future Port expansion to nitrogen deposition within those parts of the SPA which lie within 200m of either site or Harbour Road is inconsequential it will be necessary for future planning applications relating to Port expansion to determine the number of vehicle movements per day related to the proposal and whether:

a) the increase in vehicle movements along Harbour Road will collectively constitute less than 200 Heavy Duty Vehicles/day<sup>57</sup>;or

b) it will exceed 200 HDV's per day but make a contribution to nitrogen deposition equivalent to or less than 1% of the critical load<sup>58</sup> for the most sensitive habitat within the site (i.e. less than 0.1 kgN/ha/yr).

It will also be necessary for an air quality assessment to be undertaken which includes increased nitrogen deposition from shipping emissions and other industrial sources where relevant.

Provided that this is coupled with the previous cited recommendation relating to Port expansion which clearly states that proposals that will have an adverse effect will not be permitted, then it is considered that the Core Strategy will contain an adequate policy framework to ensure that adverse effects do not occur.”

### **3.14 Strategic Flood Risk Assessment**

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

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

3.14.2a A Strategic Flood Risk Assessment was prepared by the Council, together with its consultants, Scott Wilson and in consultation with the Environment Agency. The SFRA refines information on the areas within Rother District Council that may flood, taking into account other sources of flooding and the impacts of climate change, in addition to

the information on the Flood Map. The purpose of the SFRA is to inform decision-makers' knowledge of flooding, refine the information on the Flood Map and determine the variations in flood risk from all sources of flooding across and from the area. The SFRA informs the Sustainability Appraisal (incorporating the SEA Directive) of the Core Strategy and other Local Development Documents and will provide the basis from which to apply the Sequential Test and Exception Test in the development allocation and development management process.

- 3.14.3 The Level 1 and Level 2 SFRA has been completed. The Level 1 SFRA has provided useful baseline information for the SA and the flood zone mapping has been used to inform the assessment of the options.
- 3.14.4 The main sources of flooding are fluvial flooding along the River Rother (Robertsbridge and Etchingham), a combination of fluvial and tidal flooding in the lower catchment and in the Marshes and tidal flooding along the coast.
- 3.14.5 Some built up parts of Rother are susceptible to flooding caused by poor surface water drainage. This may be caused by a high water table. High tides and high river levels can influence the height of the water tables.
- 3.14.6 The Level 2 SFRA flood mapping shows flood outlines for different probabilities, impact, speed of onset, depth and velocity variance of flooding taking account of the presence and likely performance of flood risk management infrastructure. The Level 2 SFRA was applied to the following areas:
- ☐ Camber existing development boundary wholly in FRA
  - ☐ Rye Harbour existing development boundary wholly in FRA
  - ☐ Winchelsea Beach existing development boundary wholly in FRA
  - ☐ Pett Level and Marsham Flatlands existing development boundary wholly in FRA
  - ☐ Normans Bay existing development boundary partially in FRA
  - ☐ Rye (Dry Island) existing development boundary partially in FRA
  - ☐ Winchelsea (Dry Island) existing development boundary partially in FRA
  - ☐ Robertsbridge & Northbridge Street existing development boundary partially in FRA
  - ☐ Etchingham existing development boundary partially in FRA
  - ☐ Crowhurst existing development boundary partially in FRA
  - ☐ Bodiam village in countryside but wholly in FRA
  - ☐ Jurys Gap settlement in countryside but wholly in FRA
  - ☐ East Guldeford settlement in countryside but wholly in FRA
- 3.14.7 Level 2 SFRA was not required for Bexhill as it is proposed that the strategic growth area (and any other proposed development) would avoid flood Zones 2 and 3. Subsequent publication of the SHLAA has included a large area of West Bexhill as part of a 'Broad Location' and therefore possibly with some development potential. This area includes areas within flood zones 2 and 3. However, Level 2 SFRA remains unlikely to be required as this section of the site would be likely to comprise SUDs green infrastructure within the wider broad location. Such areas could be excluded from the actual development areas.
- 3.14.8 The SFRA will also be fundamental in preparing the Site Allocations DPD and informing the Sustainability Appraisal of that DPD. By this stage site boundaries will be known and detailed information on flood risk will be crucial. The allocation of sites must



reflect application of the Sequential Test, and where necessary the Exception Test, with reasoned justifications provided for any decision to allocate land in areas at high risk.

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

*Development Control (now Development Management)*

- ☐ ☐ The Environment Agency set out the framework under which an applicant or the Council can decide whether a Flood Risk Assessment is required in support of an individual planning application. This should be used to guide all development applications and is held online at:  
<http://www.pipernetworking.com/floodrisk/matrix.html>
- ☐ ☐ If development is to be constructed with less vulnerable uses on the ground level, agreements need to be in place to prevent future alteration of these areas to 'more vulnerable' uses without further study into flood risk.
- ☐ ☐ Single storey residential development should not normally be considered in flood risk areas as they offer no opportunity for safe refuge areas on upper floors.
- ☐ ☐ Where a development is applying for a change of use, flood evacuation plans should be developed through liaison with the emergency services. This accounts for changes from lower to higher vulnerability class, and should be delivered as part of the site-specific flood risk assessment.
- ☐ ☐ The Council should ensure new development in an area known to suffer storm water flooding does not increase the discharge to the existing drainage system either through restricting site discharge rates and/or through capital contributions to improvements works of the existing drainage infrastructure.
- ☐ ☐ The Council ensure that proposed developments can be accommodated by the existing drainage infrastructure provision. Where a development cannot be met by current resources, ensure that the phasing of development is in tandem with infrastructure investment.

*Flood Defence*

- ☐ ☐ The SFRA process has highlighted the importance of flood defences throughout Rother District. Future policy should seek to address how these defences are to be maintained to ensure that they are maintained to the current high level of protection.
- ☐ ☐ Review the condition of existing local defences, the dependence of additional local development on them for flood mitigation and where necessary the Council should seek to maintain and or improve defences if necessary.
- ☐ ☐ Where necessary and achievable, and through liaison with the Environment Agency and local Internal Drainage Boards, adopt a policy for the routine maintenance of all

watercourses ensuring they are clear of debris that could affect flood flow conveyance.

### *Flood Mitigation*

- ☐ Where possible, mitigate flood risk from developments through development of flood storage schemes which will also provide amenity benefit.
- ☐ Within flood risk assessments, groundwater flooding should be investigated in detail and the Council should ensure that new developments in known groundwater flood risk areas undertake a site investigation to determine the risks from groundwater flooding and incorporate mitigation measures into the design of any buildings to prevent flood damage from this source.
- ☐ Within flood risk assessments, surface water flooding should be investigated in detail, and comprehensive surface water runoff calculations undertaken.
- ☐ Require all flood risk assessment and sustainable drainage design to consider the impacts of climate change for the lifetime of the development at the site and downstream.
- ☐ Ensure discharge rates from new developments do not increase following redevelopment, including an allowance for climate change and preferably restrict discharge rates to greenfield runoff rates in areas known to have a history of sewer flooding.

### *Environmental*

- ☐ Consider the potential benefits an appropriately designed Sustainable Drainage System could have for the biodiversity, amenity value, water quality and resource value of a development and/or surrounding area.
- ☐ Consider the vulnerability and importance of local ecological resources when determining the suitability of drainage strategies/SuDS.

## **3.15 Other Key Supporting Evidence – Local Level**

3.15.1 The evidence supporting the Core Strategy can be found on the Council's website. The collation of relevant supporting evidence has been a key part of the evolving process of Sustainability Appraisal; and of the assessment of impacts of different options. Table 3.2 highlighted key supporting evidence in relation to sustainability issues, whilst Appendix 4 lists relevant policies, plans, strategies and programmes. However, it is also useful to add additional contextual information regarding the evidence material which has proved particularly useful and informative in the development of the SA. Some of the key considerations of relevance from the evidence studies are outlined below.

### Strategic Housing Land Availability Assessment (SHLAA)



3.15.2 The SHLAA assessed hundreds of possible sites on a variety of factors including environmental, landscape, flooding, landscape, access, utilities and viability. As such it gives a crucial insight into the options for, and availability of, potential housing land across the district.

#### ESCC Landscape Assessments

3.15.3 These assessments were undertaken by the ESCC 'Landscape Group' on behalf of RDC. They have been carried out for strategic development areas around Bexhill and the Hastings Fringes and for the Market Towns and Villages in order to assist consideration of the development strategy.

#### Hastings and Rother Employment Strategy and Land Review (and Update)

3.15.4 In accordance with the joint strategy for regeneration between the two local authorities, the review was undertaken jointly with Hastings Borough Council. It aimed to identify the economic needs of the area, and both the opportunities and constraints in meeting these needs. It further assessed the market potential for job creation and employment development; and considered the current balance between the demand and supply of employment land and the extent to which this is likely to change over time. The Study concluded that some 100,000 sq.m of new business floorspace is required district wide by 2026.

#### Hastings and Rother Employment Strategy and Land Review Update

3.15.5 This further joint study undertaken by Rother and Hastings Councils in 2011 considered the implications of a number of significant changes in circumstances since the original study - notably in relation to the international 'credit crunch', the new Coalition Government's priorities, publication of the East Sussex Local Economic Assessment and revised housing proposals - in terms of employment land requirements. It concludes that the original requirements remained appropriate, albeit over a slightly longer period.

#### Hastings and Rother Strategic Housing Market Assessment (SHMA) Update

3.15.6 Provides an invaluable insight into future housing requirements for both Rother and Hastings

#### RDC Green Infrastructure Study

3.15.7 The provision of GI is one of many tools that can be used to mitigate the effects of climate change with scope for reducing the incidents and severity of flooding, supporting healthy eco systems and reducing energy consumption by regulating the heat in urban spaces by managing micro climates effectively. The Rother GI Study identified potential opportunities for green infrastructure in the district and provided recommendations for a green infrastructure policy and opportunities for future provision.

#### Bexhill Town Study, Battle Town Study, Rye Town Study and Rural Settlement Study

3.15.8 These studies all formed a critical part of the process of considering evolving spatial options in the light of local context, needs, environmental/heritage assets and constraints.

#### Low Carbon & Renewable Potential Study

3.15.9 This Study's aimed to assess impacts by providing a baseline assessment of carbon emissions arising from current and anticipated developments. It further aimed to develop an evidence-based assessment of opportunities and constraints, and therefore the potential for low carbon and renewable energy technologies within Rother; and to identify robust policies for delivery, suitable technologies and targets, and evaluate the potential of strategic sites.

3.15.10 The Study considered LDF Core Strategy energy policy options based on an evaluation of their impact on the district's carbon footprint. The Study identified good opportunities in the District for low carbon and renewable technologies, particularly wind and biomass. It adds that other technologies such as solar technologies and ground source heating are also suitable but will need to be subject to more detailed analysis on a site by site basis. The study evaluated the potentials of strategic sites including north-east Bexhill, North Bexhill and West Bexhill. Some of the study's conclusions in this respect have been drawn upon in the comparison of options in Appendix 5.

#### Overall Housing Provision in Rother District Background Paper

3.15.11 This Background Paper sets out the evidence that underpins the overall housing provisions in the Proposed Submission Core Strategy. It clarifies that whilst the South East Plan's housing targets are used as the starting point for the Core Strategy, there have been significant changes of circumstances since the South East Plan was prepared that warrant a review of those targets. The changes of circumstances include a major change in national economic circumstances and, at the local level, changing assumptions about the timing of planned infrastructure, most notably the Bexhill to Hastings Link Road, have proved optimistic, with knock-on effects for development at Bexhill.

3.15.12 Against this backcloth, meeting the South East Plan's housing provisions may mean that the Core Strategy does not conform with other policies to regenerate the coastal belt, to accord with ecological imperatives, and to conserve the High Weald Area of Outstanding Natural Beauty. Therefore, this assessment aimed to provide a robust basis for the overall housing numbers in the Core Strategy, taking due account of both strategic and local considerations.

#### Affordable Housing Background Paper

3.15.13 This background paper details the evidence base which supports the affordable housing policies in the Local Housing Needs chapter of the Proposed Submission Core Strategy. It looks at thresholds, percentages and tenures of affordable housing, along with the methodology for affordable housing targets. Therefore it has been particularly useful in informing the SA of Policy LHN2.

#### Infrastructure Delivery Plan (IDP)

3.15.14 The IDP identifies key pieces of infrastructure needed to achieve the objectives and policies in the Core Strategy, and identifies broad locations where the infrastructure will be located. The IDP is a 'live' document and will be periodically reviewed and updated as infrastructure providers assess their investment plans.

#### Leisure Facilities Strategy

3.15.15 Carried out in 2009 by Capita Symonds on behalf of both RDC and HBC, this strategy looked to identify optimum locations and levels of provision of leisure facilities for the period of the strategy (2009 – 2020). It identifies the facilities needed over and above those already provided.

### **3.1516 Plan Objectives**

3.45 16.1 The Core Strategy DPD objectives (as detailed in Chapter 2, Table 2.2), which set out what the plan is aiming to achieve in spatial planning terms, set the context for development of the objectives and policies in individual chapters.

3.45 16.2 It is important that the DPD objectives are in accordance with sustainability principles, so they have been tested for compatibility against the SA Framework (see Appendix 3). This is in compliance with the SA Guidance.

3.45 16.3 As a result of the SA testing amendments were made to some objectives, or their component sub-objectives, so they could better address a wider range of SA Objectives. The commentary to Appendix 3 contains more details.

## 4 APPRAISAL METHODOLOGY

### 4.1 Introduction

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

### 4.2 Approach to the SA

**Table 4.1** The Sustainability Appraisal Framework

	<b>Sustainability Appraisal Objectives</b>
<b>1</b>	Ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home
<b>2</b>	Improve the health and well-being of the population and reduce inequalities in health
<b>3</b>	Reduce crime and the fear of crime
<b>4</b>	Reduce deprivation and social exclusion
<b>5</b>	Raise educational achievement levels and develop the opportunities for lifelong learning
<b>6</b>	Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities
<b>7</b>	Improve accessibility to services and facilities for all ages across the District
<b>8</b>	Encourage and facilitate increased engagement in cultural and leisure activities
<b>9</b>	Improve efficiency in land use and encourage the prudent use of natural resources
<b>10</b>	Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage
<b>11</b>	Reduce emissions of Greenhouse gases
<b>12</b>	Minimise the risk of flooding and resulting detriment to people and property
<b>13</b>	Maintain, improve and manage water resources in a sustainable way
<b>14</b>	Conserve and enhance biodiversity <i>by protecting both designated and non-designated but locally important species and habitats</i>
<b>15</b>	Protect and enhance the high quality natural and built Environment <i>including landscape and townscape character and particularly the protection of the High Weald AONB.</i>
<b>16</b>	Reduce waste generation and disposal, and achieve the sustainable management of waste

4.2.1 As a result of the Scoping exercise a SA Framework was devised for use as a tool in the assessment process. The SA Framework, as shown in Table 4.1, consists of Sustainability Objectives that reflect the specific priorities and needs of the District and therefore provides the methodology for identifying possible conflicts and suggesting solutions. The associated indicators are shown in Appendix 1 and 2. Two of the SA Objectives, numbers 15 and 16 have been updated and elaborated since the Initial SA as a result of consultation representations by Natural England. The additional text is shown in italics in Table 4.1

4.2.2 A series of decision-aiding questions or sub-objectives has been devised for each SA Objective in order to facilitate the appraisal process. The full SA Framework including the decision-aiding questions can be found in Appendix 2. An example of this is shown below:

Objective:

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

*Decision-aiding questions:*

Does the option/policy:

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

4.2.3 Each option will be assessed in order to identify:

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

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

4.2.5 Whether an effect is considered likely to be significant will depend on whether it has a material impact on an SA Objective. The effects may be judged according to:

- ☐ Probability, duration, frequency and reversibility of the effects
- ☐ Cumulative nature of the effects
- ☐ Trans-boundary nature of the effects
- ☐ Risks to human health or the environment
- ☐ Magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)

- ☐ Value and vulnerability of the area likely to be affected due to: special natural characteristics or cultural heritage; exceeded environmental quality standards or limit values; intensive land use; or effects on areas having a recognised national, Community or international protection status
- ☐ How they contribute to achieving, or restrict the achievement of the various elements of the SA Objectives

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

**Table 4.2** Sustainability Appraisal Scoring Criteria

Symbol	Likely effect against the SA Objective
✓	Potentially significant beneficial effect
( ✓ )	Option supports this objective though it may only have a minor effect
≈	1. Policy has no effect 2. Effect is neutral insofar as the benefits and drawbacks appear equal and neither is considered significant
?	Uncertain or insufficient information on which to determine the assessment at this stage
( x )	Option appears to conflict with the objective and may result in minor adverse effects
x	Potentially significant adverse effect

- 4.2.7 The methodology used for assessing the cumulative and synergistic effects of the options is discussed below.
- 4.2.8 The cumulative effects, identified in the assessment of the Plan Strategies, are those that result from the interaction of all of the Strategies. Consequently, the adverse impacts of some Strategies on a particular SA Objective will be outweighed by the benefits of others. Synergistic effects can be described as those that are greater than the sum of the individual effects.
- 4.2.9 The symbols used are as follows:

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

Symbol	Effect
✓	Beneficial Effect
(✓)	Beneficial Effect (but potential for mitigation)
≈	No effect
?	Uncertain effect
(x)	Adverse effect (but potential for mitigation)
x	Adverse effect

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

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

### 4.3 Who carried out the SA

4.3.1 The SA was carried out by Planning Officers in the Planning Strategy and Environment section of Rother District Council in accordance with advice co-ordinated via the Planning Advisory Service (PAS) and delivered via ~~Baker Associates~~ consultants specialising in Sustainability Appraisal,



## **5 PLAN OPTIONS**

### **5.1 Introduction**

- 5.1.1 The Council is required to plan for further development in the District and has the responsibility of preparing a new Local Development Framework (LDF) to guide change to 2028.
- 5.1.2 The Council aims to do this in a way that is guided by a vision for what Rother should be like in the future – one that reflects the needs and aspirations of local people and communities.
- 5.1.3 The first task in the process is to produce the Core Strategy document that will set the vision and general level and distribution of development within the District up to 2028.
- 5.1.4 The Core Strategy, by looking 15-20 years ahead, can take a long-term view of the direction of change, rather than simply meeting short to medium-term development requirements.
- 5.1.5 There have been two previous stages of consultation. The Council produced a [‘Core Strategy Issues and Options Discussion Document’](#) in October 2006 which suggests broad development options to ensure the widest possible debate. This document was widely consulted upon between October and December 2006. This was followed by the ‘Consultation on Strategy Directions’ document which was published in November 2008 and consulted upon until January 2009.
- 5.1.6 The generation of reasonable options is central to the preparation of DPDs and the appraisal of these options is a key part of the SA process.

### **5.2 Main strategic options considered and how they were identified**

- 5.2.1 The Initial Sustainability Report published in November 2008 assessed the options that were presented within the Consultation on Strategy Directions (see Section 5.2 of the Initial SA).
- 5.2.2 The options presented at the Core Strategy ‘Strategy Directions’ stage have been progressed in light of representations received, further discussion with key stakeholders and in light of evidence based studies undertaken. [Section 3 highlighted some of the key evidence that has usefully informed the development of the Sustainability Appraisal, whilst relevant policies, plans, strategies and programmes are listed in Appendix 4.](#)
- 5.2.3 The options discussed within the Core Strategy ‘Consultation on Strategy Directions’ November 2008 were assessed in Appendix 3 [4](#) of the [Initial SA](#) document [in tables that included information on the central themes of the options, the main areas of change \(where relevant\), scale of growth \(where relevant\), the strategy emphasis and the strengths and weaknesses.](#) This information was used to inform the SA of the options [\(as summed up in section 5.4 of the Initial SA\).](#)
- 5.2.4 Options were previously developed [in the Initial SA](#) for the following:

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

5.2.5 The following sections of this SA identify the plan options, elaborating on why they were chosen in light of the evolving process. The actual outcome of applying sustainability appraisal to the options is covered in Appendix 5.

5.2.5a Thus, many of the emerging Core Strategy options were already identified and assessed in the 'Initial Sustainability Appraisal' Report published in November 2008 (in Appendices 3 and 4 of that document).

5.2.5b Therefore it is important to note that this Sustainability Appraisal of the Pre-Submission Core Strategy only includes options where either;

1. They have changed substantially, or;
2. New options have been developed or emerged

### Option (A) District Wide Spatial Distribution

Option A1 – Re-distribute development deficit as a result of link road delay or cancellation, elsewhere within the district.

Option A2 – 'Ring fence' development in Bexhill and Hasting Fringes so that unavoidable changes such as link road delay / cancellation do not impact on required development levels elsewhere in the District.

### Commentary

5.2.5c The Initial SA contained five options for the 'Overall Spatial Distribution' as follows:

1. Based on Relative Proportion of Current Population
2. Based on Service Centre Role
3. Trend-based Option
4. Based on the Extension of Current Housing Commitments
5. Based on Housing Needs

5.2.5d Option 2 'Based on the Service Centre Role' emerged as the preference for the overall spatial distribution. As the main service town in the district, Bexhill was therefore considered the appropriate location for a high proportion of new growth.

5.2.5e Subsequent uncertainty regarding national funding availability for the Hastings-Bexhill link road required a further assessment of spatial distribution options that reflected this

uncertainty and its possible implications for development in Rother District, hence options A1 and A2.

5.2.5f The link road's significance is due to the fact that future development in North-East Bexhill is dependent upon it's delivery. North-East Bexhill was allocated in the Adopted 2006 Local Plan and is by far the biggest allocation of housing and employment in Bexhill, and indeed in the District as a whole.

5.2.5g The possibility of delay or even cancellation to the link road would be a deviation from the Rother District Core Strategy as presented at 'Strategy Directions' stage when link road completion was anticipated by 2012/13. Even delay would result in loss of development as it would not be possible to start developing housing and employment at North-East Bexhill as early as previously anticipated and hence there would be a shortfall stemming from the years of delay.

5.2.5h Therefore, it is necessary to consider the option of re-distributing the development deficit as a result of link road delay or cancellation, elsewhere within the district (Option A1) against the alternative of ring fencing development in Bexhill and Hasting Fringes so that unavoidable changes such as link road delay / cancellation do not impact on required development levels elsewhere in the District (Option A2).

## **Option (B) District Wide Scale of Growth**

**Option B1 – Continue South East Plan requirements of 280 per annum for 2006-2026 or 5,600 over the 20-year plan period (or equivalent rate of development to 2028)**

**Option B2 – A Lower rate of development than that directed by the South East Plan, in recognition of changed circumstances.**

### **Commentary**

5.2.5i The Initial SA assessed two options regarding the District wide scale of growth, namely:

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

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

5.2.5j Option 1 was the preferred option in the Core Strategy in the 2008 'Consultation on Strategy Directions'. However it has proven necessary to look again at options for the District-wide scale of growth due primarily to the factors related to link road uncertainty (as outlined in the commentary to option A above).

5.2.5k The latest Option B1 is more or less the same option as option 1 in the Initial SA, namely the South East plan requirements of 280 per year, or equivalent rate of development to 2028 (note the plan period has been extended from 2026 to 2028 due to delay and to allow for a 15 year plan period from date of adoption).

5.2.5l The rationale behind the latest Option B2 'A Lower rate of development than that directed by the South East Plan, in recognition of changed circumstances' relates largely to the factors related to link road uncertainty (as outlined in the commentary to option A above).

However, there are also secondary factors, including a lowered expectation of building rates in light of the recession, and also a reduction in the assumed level of housing development possible at Rye following more in depth investigation in the Rye Town Study background evidence study.

## **Option (C) Bexhill – Strategic Direction of Growth**

**Option C1 – Focus new development to the north-east of the town.**

**Option C2 – Focus new development to the west of the town**

**Option C3 – Focus new development to the north of the town**

### **Commentary**

5.2.5m Three broad areas for outward expansion of Bexhill are identified based on evidence, including the Landscape Assessment and SHLAA. These include the existing allocated development area to the north-east of the town (Option C1), as well as an area astride the A259 to the west of the town (Option C2).and a broad area astride the A269 to the north of Bexhill (and to the west of the NE Bexhill area), which is Option C3.

5.2.5n It is considered that these are the reasonable broad locations capable of accommodating a large scale of development such that they should be highlighted in the Core Strategy.

5.2.5o Other options have been ruled out for strategic environmental and/or access reasons.

5.2.5p North-east Bexhill (option C1) has been promoted for some time, indeed it is already an allocated site within the adopted 2006 Local Plan. Option C2 to the west of the town abutting Little Common has been promoted as an alternative option during the course of the emerging Core Strategy, whilst Option C3 has emerged as potential strategic site linked to north east Bexhill by the proposed spine road.

5.2.5q It is important to note that the Hastings-Bexhill Link Road scheme has been promoted through separate statutory procedures and the 'Major Scheme Business Case' contained all the relevant procedures. Furthermore the assessment of Policy OSS2 'Bexhill to Hastings Link Road and Development' is contained within Appendix 6

## **Option (D) Bexhill – Scale of Growth**

**Option D1 – Level of development proposed in Consultation on Strategy Directions (3,100 – 3,300 by 2026 or equivalent to 2028)**

**Option D2 – A lower rate of development than that anticipated in the Core Strategy 'Consultation on Strategy Directions', in recognition of changed circumstances. This will total 2,050-2,250 between 2011 and 2028 averaging 129 per year assuming development associated with link road from 2016**

**Option D3 – A continuation of 'pre-link road' level of development (some 75 dwellings per year) throughout the plan period, In effect assuming the link road will not be constructed.**

## Commentary

5.2.5r The Core Strategy Issues and Options consultation document in 2006 raised three alternative approaches in relation to Bexhill's role, each with a potential impact upon the scale of growth in the town. The options were as follows:

- Option 1 – Maintain Bexhill's role: (This looked to retain the town's current function and its relationship with Hastings.)
- Option 2 - Expansion of Bexhill's role (This proposed expansion of the town's function, making it a stronger centre for jobs and services, with a clear independent identity and a re-balancing of the demographic profile.)
- Option 3 – Coordinated development at Bexhill and on the edge of Hastings (Rather than focus on Bexhill simply in terms of its own urban needs and potentials, this proposed taking a holistic view of the needs and opportunities of Bexhill and Hastings, especially in terms of their combined potential for regeneration, with development well related to both.)

5.2.5s The Initial SA continued to assess three very similar options (albeit with a slight re-wording of option 3). Options 1 was accepted in conjunction with Option 3 in the Initial SA. Option 3 was accepted in line with Plan Objectives and shared vision moderated by Option 1 recognising Bexhill's independent but complementary function vis à vis Hastings, as well as its own priorities for future well-being. Option 2 was rejected as 'economic growth forecasts and housing market conditions do not support this growth agenda; uncertainty over infrastructure provision and cumulative impact on town's character'.

5.2.5t The Proposed Submission Core Strategy SA includes two options that relate specifically to Bexhill ('Scale' and 'Strategic Direction'), as well as several other options heavily dependent on Bexhill Factors. The three options related to scale are all related in one way or another to the Hastings to Bexhill link road.

5.2.5u Option D1 reflects the previous programme as set out in the previous round of the Core Strategy - the 'Consultation on Strategy Directions'.

5.2.5v Option D2 reflects the current programme that has emerged during the course of preparing the 'Proposed Submission' Core Strategy. Option D2 assumes a delay in the link road, with opening from late 2014/early 2015 with associated development from 2016. The delay in link road construction means it will be difficult to achieve the rate of development in Bexhill in the earlier parts of the plan period (since much development was Link Road dependent in North East Bexhill). Delay in opening the link road impacts on the overall quantum of housing growth, as the Highways Authorities have indicated that they do not believe that large new sites can be built in ahead of the Link Road.

5.2.5w Option D3 assumes a continuation of 'pre-link road' level of development (some 75 dwellings per year) throughout the plan period. In effect assuming the link road will not be constructed.

## Option (E) Hastings Fringes Issues

Option E1 – Continue with proposed development at Breadsell as set out in the scale of development identified in Core Strategy 'Consultation on Strategy Directions'

## Commentary

5.2.5x The Core Strategy 'Consultation on Strategy Directions' had a preferred distribution for Hastings Fringes of 200-450 dwellings. 44 of these stemmed from permissions, meaning some 156-406 would be required from new allocations. In addition it proposed some 10,000 sq.m of business floorspace and a new railway station in the Wilting area, 'if this is shown to be feasible'.

5.2.5y The SHLAA indicated that by far the largest potential development site was at Breadsell, in effect meaning that development levels for the Hastings Fringes were heavily dependent on a single site.

5.2.5z It is necessary to SA Hastings Fringes scale of development because the assumptions set out in the 'Strategy Directions' have since come into question thus undermining the basis for continuing with the level of growth as set out in the Core Strategy 'Consultation on Strategy Directions'. The scale needs to be reviewed on the basis that the 'Baldslow Improvement' road scheme has been removed from the Highways Agency's programme, there are no specific plans for a new station at Wilting, and Hastings Borough Council are no longer proposing large-scale development adjacent to land at Breadsell in Rother District, which limits the sustainability of the Rother section of the site.

5.2.5aa Therefore this option needs to assess the sustainability issues around continuing with the same scale of development identified in 'Consultation on Strategy Directions' for Hastings Fringes.

5.2.5ab Although not explicitly stated, the alternative option is obviously apparent, i.e. to not continue with this level of development. Negative SA scores will obviously imply the alternative option of a lower level of development is the more sustainable choice, The lower level of development is assumed to be 45-80 dwellings, with a removed policy reference to development at Breadsell and at Wilting Farm, and an amended reference to 'at least 3,000sq.m of employment floorspace'

## **Option (F) Battle – Strategic Direction of Growth**

**Option F1 – Focus new allocations to the south-east of the town.**

**Option F2 – Focus new allocations both within the development boundary and via modest peripheral expansion opportunities (following further work as part of the Site Allocations DPD), with no particular focus on any side of the town.**

### **Commentary**

5.2.5ac The Initial SA in November 2008 assessed two options for Battle as follows:

Option 1 Continue to Support the Market Town Role of Battle

Option 2 Limited Growth / Consolidation

5.2.5ad Option 1 of the Initial SA was accepted after appraisal against SA and plan objectives suggested that careful implementation of the option would be more beneficial than a lower growth option in terms of recognizing Battle's service centre role and providing for local economic, housing and community needs subject to environmental acceptability. Option 2



was rejected in the Initial SA on the basis that it “would not provide adequate support for the local economic, housing and community needs”.

5.2.5ae The ‘Urban Options Background Evidence Paper’ investigated five different potential growth sectors around Battle. As a result of the recommendations of this evidence, the Core Strategy recommended that areas east and south east of Battle (sectors 4 and 5 in the Urban Options Background Paper) had the most potential for sustainable and sensitive development in the long term. Whilst growth to the east is taken as a given (the Blackfriars site has an outline permission subject to S106), the concept of focusing further new allocations to the south-east of the town is the basis of Option F1 in this SA.

5.2.5af The Urban Options Background Paper was subject to further refinement in the Battle Town Study background paper, the recommendation of which forms the basis of Option F2 ‘Focus new allocations both within the development boundary and via modest peripheral expansion opportunities (following further work as part of the Site Allocations DPD), with no particular focus on any side of the town.’

## **Option (G) Rye – Scale of Growth**

### **Option G1 – Continue Scale and Rate of Housing Development as set out in the Core Strategy 'Consultation on Strategy Directions' (or equivalent rate of development to 2028)**

#### Commentary

5.2.5ag The Initial SA compared the following two options for Rye:

Option1 - Strengthen the Market Town Role of Rye and the Commercial Role of Rye Harbour and the Port of Rye

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

5.2.5ah Both options from the Initial SA were accepted in part. Assessment against the SA and Plan Objectives found that an amalgam of the two options would best address the particular circumstances of the area. A balance is required between housing and employment whilst minimising adverse effects on the high quality natural, built and historic environment, notwithstanding the need to plan carefully with regard to flood risk taking into account climate change.

5.2.5ai The further option assessed as part of the current SA focus specifically on the appropriate quantum of development. Option G1 proposes development levels as they appeared in the Core Strategy ‘Strategy Directions’, in which Rye had a preferred housing distribution of 450 dwellings over the period 2006-2028, with 10,000 to 20,000 sq.m of employment.

5.2.5aj Although not explicitly stated, the alternative option is to not continue with this level of development. The option to set lower development targets has emerged in light of further background evidence work, particularly the Rye Town Study and the SHLAA, which suggest the previously anticipated levels of residential development may not in fact be achievable in practice, given the considerable environmental and heritage constraints of the area. The slightly lower levels of development equate to the provision of 250 to 350 net additional dwellings, and at least 10,000 sq.m of employment floorspace (all over the period 2011 and 2028).



## **Detailed SA of the Options**

5.2.6 Section 5.4 (supported by Appendix 5) of *this* document assesses the above options in detail, including by assessment against the sixteen SA objectives, a commentary, including an assessment of Conformity / Non-conformity with other policy/ initiatives

5.2.7 Section 5.5 includes a summary of why the options were accepted or rejected. Section 6, sums up the overall significant environmental, economic and social effects of the plan policies, including an assessment of their cumulative and synergistic effects (including in the short-term, medium-term and long-term). The Matrices for comparing plan policies against SA objectives in tables 6.1 and 6.2 is also informative in this regard. Section 7 usefully sums up proposed mitigation measures.

~~5.2.5 Appendix 3 of *this* document assesses options from the 2011 ‘Proposed submission version of the Core Strategy’, but only in those instances where they are substantially different to the options that were already assessed in the Initial SA.~~

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

5.3.1 A comparison of the social, environmental and economic effects of the options from the Core Strategy ‘Consultation on Strategy Directions’ November 2008 was carried out in Appendix 4 of the Initial Sustainability Appraisal.

5.3.2 ~~Appendix 4~~ Section 5.4 of *this* document ~~lists~~ assesses plan options from the 2011 ‘Proposed submission version of the Core Strategy’, but only in those instances where the options are substantially different to the options that were already assessed in the Initial SA. Appendix 5 compares the social, environmental and economic effects of options

### **5.4 Summary of Consideration of Options**

5.4.1 This section sums up new options that were chosen to progress to strategies, in consideration of social, environmental and economic issues. It also highlights which were accepted and which were rejected and why. These are all essentially new options that were not considered at the Initial SA.

5.4.2 The assessment constitutes a thorough investigation of the options considering short, medium and long-term effects. Conformity and nonconformity with Government policy and targets and the objectives of the Core Strategy and supporting documents are considered and documented. Where possible the more sustainable options were used in preparing the Plan Strategies.

## Option (A) District-Wide Spatial Distribution

Option (A) District-Wide Spatial Distribution
<b>Option A1 – Re-distribute development deficit as a result of link road delay or cancellation, elsewhere within the district.</b>
<b>Conformity with other policy/initiatives:</b> Would aim to achieve housing target set in South East Plan, although doubtful whether there is sufficient potential elsewhere outside the sub-regional area to achieve this without conflict with SA Objectives and other SE Plan objectives, as well as PPS7, PPS9, etc.
<b>Non-conformity:</b> Possible conflict with AONB objectives. Arguably conflicts with principles of emerging Localism Bill (a material consideration) in that it allows housing numbers to be derived via local needs rather than top-down regional requirement.
<b>Option A2 - ‘Ring fence’ development in Bexhill so that unavoidable changes such as link road delay / cancellation do not impact on required development levels elsewhere in the District.</b>
<b>Conformity with other policy/initiatives:</b> Arguably greater conformity with emerging Localism Bill (a material consideration) in that it allows housing numbers to be derived via local needs rather than top-down regional requirement. Likely to be less conflict with AONB objectives.
<b>Non-conformity:</b> South East Plan housing target, although arguably conforms more with other SE Plan objectives.

### Option A: Commentary and Summary

5.4.2a Option A1 would result in higher levels of growth than option A2, as a consequence of re-distributing the development, particularly that which would have been built alongside the link road at North-East Bexhill. Therefore Option A1 emphasises housing and employment growth and effectively provides the South East Plan housing requirements (as set out in the Initial SA ‘scale of growth option 1’, i.e. 280 dwellings per annum).

5.4.2b In Option A1, development would be redistributed potentially elsewhere in the District, namely rural areas, Battle, Rye, Hastings Fringes or other areas of Bexhill. However, it is reasonable to assume that development pressure would be in line with recent market trends and therefore most acute in rural areas (as demonstrated in the trend-based distribution option within the Core Strategy ‘Consultation on Strategy Directions’ – para 5.36). Therefore it is considered that the weakness of Option A1 is that it may lead to unsustainable levels of growth in areas such as the High Weald AONB, contrary to SE Plan policies concerned with environment, landscape and heritage. Another likely consequence of Option A1 is that the SE Plan and Core Strategy policies prioritising a shared vision based on regeneration with Hastings would be compromised via the effective promotion of development in locations not as well related to Hastings as north-east Bexhill.

5.4.2c Option A2 emphasises the co-ordination of supporting infrastructure. It would undeniably result in a lower level of development across the District over the course of the plan period. However it would allow a much greater degree of conformity with the SE Plan and local objectives for a shared economic vision with Hastings by prioritising development that complements this vision, as well as restricting the scale of development in the High Weald AONB to what has previously been recognised as consistent with its objectives.

5.4.2d There is a distinction within both Options A1 and A2 between the effects of link road delay, and the effects link road cancellation, which is drawn out in more detail in the D options. The key fact is that the effects of delay would be more short-term, meaning the

scale and rate of delivery could no longer be achieved in the early part of the plan period. Both Link Road delay and cancellation are both eventualities covered by Core Strategy policy OSS2. Cancellation would have significant consequences for the overall vision and strategy and on the area's capacity for economic growth - which is a priority.

5.4.2e Although option A1 performs reasonably against the social and economic objectives and should deliver increased affordable housing, overall option A1 performs poorly on sustainability criteria compared to A2. Thus A2 is the chosen option within the Proposed Submission Core Strategy.

## Option (B) District-Wide Scale of Growth

Option (B) District-Wide Scale of Growth	
<b>Option B1 – Continue South East Plan requirements of 280 per annum for 2006-2026 or 5,600 over the 20-year plan period (or equivalent rate of development to 2028)</b>	
<b>Conformity with other policy/initiatives:</b> Would conform with housing target set in South East Plan.	
<b>Non-conformity:</b> Possible conflict with AONB objectives and PPS7 and PPS9.. Arguably conflicts with principles of emerging Localism Bill (a material consideration) in that it allows housing numbers to be derived via local needs rather than top-down regional requirement.	
<b>Option B2 – A Lower rate of development than that directed by the South East Plan, in recognition of changed circumstances.</b>	
<b>Conformity with other policy/initiatives:</b> Arguably greater conformity with emerging Localism Bill (a material consideration) in that it allows housing numbers to be derived via local needs rather than top-down regional requirement. Greater conformity with AONB objectives	
<b>Non-conformity:</b> South East Plan housing target.	

## Option B: Commentary and Summary

5.4.2f Option B1 in effect assumes a continuation of the levels and timing of development described in the previous round of the Core Strategy - the ' Consultation on Strategy Directions'. The level of housing growth is to continue South East Plan requirements of 280 per annum for 2006-2026 or 5,600 over the 20-year plan period (or equivalent rate of development to 2028). In terms of employment development, the Employment Strategy and Land Review concluded that 100,000sq.m of business floorspace over the plan period would be an appropriate target to improve the balance between homes and jobs and meet economic objectives, with the majority following on from construction of the link road. Approximately 50,000 sq.m would be contained within the major urban extension of north-east Bexhill and thus linked to a very large extent to link road construction.

5.4.2g The changed circumstances described in option B2 relate primarily to the delay and cancellation of the Hastings to Bexhill Link Road (circumstances that would require amendments as set out in emerging CS Policy OSS2); but also the poor state of the economy and a lowered expectation of development levels at Rye in the light of further evidence. Several different factors need to be balanced to determine the most appropriate scale of residential development. The 'drivers' for growth, which includes demographic projections and housing market pressures, must be balanced against

supply constraints, notably environmental designations and infrastructure availability. Critical in balancing these is the vision that local communities have for their area.

5.4.2h The South East Plan assumed that the Bexhill to Hastings Link Road would be built by now, yet the earliest it can now be built is the very end of 2014. Furthermore, the recession and on-going weak national economic growth forecasts, mean that the prospect of actually increasing on past build rates, as implied by the South East Plan target of 280 dwellings/year) (compared to actual house-building between 1991 and 2011 of only 245 dwellings per year), seems overly optimistic and unlikely to be matched by requisite job growth. The cancellation of other transport infrastructure improvements that would have given a boost to economic regeneration at Bexhill and Hastings, notably capacity increases in the Hastings to Ashford railway line and A21 improvements, also impacts on the potential for sustainable growth. Critical environmental factors that limit the scope for development in Rother include the High Weald AONB, significant areas of flood risk and international and national nature conservation sites.

5.4.2i Local community needs and aspirations for more affordable housing and jobs, as well as for improved services and facilities, have also been reviewed and taken into consideration in supporting evidence.

5.4.2j In Option B2, the appropriate overall target for net additional housing in the district over the period from April 2011 to March 28 (17 years) most likely equates to some 3,700 - 4,100 dwellings, or an average of 218 - 241 dwellings/year. The overall employment target of 100,000sq.m is probably still appropriate in option B2, since the majority of new employment floorspace was to follow on following construction of the link road, and still can do so (despite an assumed delay), particularly as the plan period has been extended to 2028. A cancellation of the link road would have much more serious negative impacts upon housing and economic criteria, and is an eventuality that would require an amended overall development strategy (as set out in emerging CS Policy OSS2).

5.4.2k Option B1 performs better on housing and economic criteria, but poorly on more overall sustainability criteria compared to B2. This suggests that Option B1 with its South East Plan requirement for 5,600 dwellings to be built in Rother 2006 – 2026 (with over 70% in the coastal parts, mainly Bexhill) is less sustainable; and that option B2 should be the chosen option within the Proposed Submission Core Strategy.

## Option (C) Bexhill – Strategic Direction of Growth

Option (C) Bexhill – Strategic Direction of Growth
<b>Option C1 – Focus new development to the north-east of the town.</b>
<b>Conformity with other policy/initiatives:</b> South East Plan policy SCT3 specifically mentions need for mixed-use development sites at North East Bexhill. This is in context of regeneration of Sussex Coast sub-region economy. Policy SCT7 focuses economic and social regeneration on the 'Hastings - Bexhill area - to develop and extend the work already undertaken in the 'Five Point Plan' into the longer term and to capitalise as a regional hub. <a href="#">Will contribute towards housing target set in South East Plan.</a>
<b>Non-conformity:</b> None.
<b>Option C2 – Focus new development to the west of the town</b>
<b>Conformity with other policy/initiatives:</b> <a href="#">Will contribute towards housing target set in South East Plan.</a>
<b>Non-conformity:</b> AA cites <a href="#">potential</a> habitats issues <a href="#">as a result of location within hydrological catchment of Pevensey Levels Ramsar, although it concluded there would be no adverse effects provide recommendations for mitigation were followed.</a> Possible conflict with PPS9.
<b>Option C3 – Focus new development to the north of the town</b>
<b>Conformity with other policy/initiatives:</b> Conformity with South East Plan, although to a lesser extent than option C1 due to proximity of inter-relationship with Hastings, although North Bexhill's relationship to Hastings <a href="#">will be further enhanced by the provision of the spine road associated with the link road development. Although North Bexhill is not specifically mentioned in the South East Plan (unlike NE Bexhill which is specifically mentioned), SE Plan policies emphasise the importance of Bexhill's relationship with Hastings (particularly SE Plan policy SCT7, and SCT2 to a lesser extent). North Bexhill is better placed geographically than West Bexhill to lend support to such policies. Will contribute towards housing target set in South East Plan.</a>
<b>Non-conformity:</b> None

## Option C: Commentary and Summary

5.4.2l As Bexhill is the main urban area in the District and is planned to accommodate a large proportion of total development, consideration is given within this appraisal of whether there are broad locations capable of accommodating a large scale of development such that they should be highlighted in the Core Strategy.

5.4.2m Three broad areas for outward expansion of Bexhill are identified based on evidence, including the Landscape Assessment and SHLAA. These include the existing allocated development area to the north-east of the town, as well as a broad area astride the A269 to the north of Bexhill (and to the west of the NE Bexhill area), and an area astride the A259 to the west of the town. Other options have been ruled out for strategic environmental and/or access reasons.

5.4.2n In developing these options, consideration has been given as to whether any of them can be regarded of strategic importance to the implementation of the development strategy and, as such, should be so identified. It was concluded that only the area to the north-east of the town could be regarded as critical to the overall strategy, as it is specifically identified in the South East Plan as being integral to the sub-regional strategy for the Sussex Coast. In addition, it is already allocated in an adopted Local Plan, and is supported by neighbouring Hastings Borough Council, not least because of its potential to accommodate substantial employment floorspace relatively close to Hastings and hence make a strategic contribution to regeneration and new jobs.

5.4.2o Notwithstanding this, the sustainability appraisals of all options are carried out to enable comparison between the sustainability issues for development at North and West Bexhill, but also between both these areas and North-East Bexhill. Hence, it allows the option of an alternative development approach to that set out in the South East Plan and existing Local Plan to be re-appraised.

5.4.2p The scales of development assumed for the purposes of the SA reflect both their strategic potential and the overall scale of development proposed across the town (see Option D below).

5.4.2q Option C1 assumes some 1,300 dwellings and 50,000sq.m. of business floorspace, as well as additional land for retail, primary education, community use, open space and renewable energy production. This is based on the existing adopted plans for development in this area.

5.4.2r Option C2 and Option C3 are assessed on a 'like-for-like' basis in terms of their development potential, reflecting their area and the possibility that either or both could warrant being identified as 'broad location' for further development. The scales of development assumed in each case is 250-600 dwellings, 5,000sq.m. of business floorspace and commensurate neighbourhood facilities. These are defined in the light of evidence (including the Landscape Assessment and the SHLAA). It is important to note that whilst some of the areas were submitted to RDC by landowners and developers, in other areas the Council has itself been proactive in identifying suitable options, particularly under the auspices of the SHLAA.



5.4.2s North-east Bexhill (option C1) affords considerable advantages as a location, both economic, environmental, and social. North-east Bexhill's economic advantages relate primarily to its close relationship with the Hastings, which will benefit still further from the development of the Link Road. The fact that the area's successful regeneration hinges on successful working with its larger neighbour has long been recognised. The Hastings and Bexhill Task Force was established in July 2001 to bring together a regeneration strategy for the Hastings and Bexhill area. It received government funding for its 'Five-Point Plan' which focussed on five themes - Urban Renaissance, Education, Business & Enterprise, Broadband & ICT and Transport. More recently the joint regeneration strategy for Hastings and Bexhill has been recognised in South East Plan policies, as well as being central to the vision and objectives of Rother's own emerging Core Strategy. Bexhill in its entirety sits within the Hastings TTWA and one of the principal advantages of North East Bexhill is that it has the scale and accessibility to provide a strategic employment area to serve the Hastings Labour Market and hence make a substantial contribution to regeneration.

5.4.2t Environmentally, it has the potential to exploit renewables (wind power, passive solar gain) when developed alongside the link road. Evidence in the form of RDC's Low Carbon & Renewable Potential Study recommended the site as suitable for a large scale wind turbine, and further noted some potential for biomass CHP. Work carried out as part of the North East Bexhill Masterplan SPD such as AEA's 'A review of potential sustainable energy measures' had similar findings and recommendations. A further environmental advantage of NE Bexhill is that it is adjacent to the proposed Combe Valley Countryside Park - 640ha of green infrastructure ideally situated to serve two of the larger urban areas in East Sussex (Hastings and Bexhill), which both have significant pockets of deprivation adjacent to the park boundary. The advantages of this project were further outlined in the RDC Green Infrastructure Study as well as the ESCC Strategic Open Space Study and ESCC Environment Study. Development at NE Bexhill will help facilitate this project which will in turn establish a strong urban edge to Bexhill and Hastings, further preventing coalescence of the two towns and providing a strategic open space in an area of proven need. NE Bexhill has a notable advantage over alternative options C2 and C3 in respect of both being located adjacent to this area, and helping to facilitate it. There are no comparable opportunities adjacent to either of options C2 or C3 that would serve such a significant population.

5.4.2u It is also noteworthy that in a District that is 80% AONB with much of the remainder comprising flood zone and international habitat, the NE Bexhill strategic development site is relatively constraint free in these respects. Some sections of the site sit within the Combe Haven and Marline BOA, which should afford opportunities for habitat restoration and improvement should be sought alongside any development. Whilst not containing habitats of international importance, the area of GI between Bexhill and Hastings contains several Biodiversity Action Plan Priority Habitats that will benefit from the protection and enhancement that incorporation within the park boundary will bring.

5.4.2v Social advantages are similar in many respects to economic advantages. NE Bexhill would benefit from close proximity to Hastings Conquest Hospital (with its A&E ward), Hastings Higher Education Establishments (including the University Centre - a notable achievement of the Task Force) and the higher order sub-regional town centre of Hastings, with its many social, community and leisure facilities (shops, cinema, theatre, etc). In terms of transport infrastructure, it is important to note that Hastings is defined



as East Sussex's only 'Regional Hub' (as defined in the South East Plan). North-east Bexhill is however undeniably an urban fringe location and as a consequence, social links with Bexhill Town Centre are an arguable weakness of the location, although the distance is still less than either North or West Bexhill.

5.4.2w West Bexhill (Option C2) is not overly constrained environmentally, not being within the AONB or international sites. However it is within reasonable proximity of international sites and within the hydrological catchment area of the Pevensey Levels and the Appendix 5 table of this option details possible implications of this. There are four areas of TPO within the strategic site and a band of flood zone (2011 EA mapping) just under 100 metres wide stretching across the northern section of the site. Northern sections of the site sit within the Pevensey Levels Biodiversity Opportunity Area, so opportunities for habitat restoration, improvement should be sought alongside any development (further details in Rother's Green Infrastructure Study). Economically it is less advantageous, not being well located to existing employment areas (notwithstanding any employment that may be achieved on the development site itself). House prices are typically high in the neighbouring vicinity, so property here may be relatively unaffordable for local people and families in need. Socially, West Bexhill enjoys good proximity to Little Common District centre, but is relatively further afield from the higher order services (Higher education and hospitals) in Bexhill and Hastings

5.4.2x North Bexhill (Option C3) also has environmental advantages. In common with other Bexhill major sites, it is not within the AONB. Large sections of the site sit within the Bexhill Fringe Biodiversity Opportunity Area, so opportunities for habitat restoration, improvement should be sought alongside any development (further details in Rother's Green Infrastructure Study). The site is relatively free of landscape issues, although as with any urban fringe greenfield development there would be some impact. Based upon EA Flood mapping at 2011, none of the site was within the flood zones, although there are minor streams within the area which may reduce the developable area. In terms of economic benefits, the area will have an improved accessibility to Hastings following completion of the Country Avenue. Therefore many of the economic and social benefits discussed in relation to North-east Bexhill (Option C1) will also apply, albeit to a lesser extent than option C1.

5.4.2y In conclusion, focusing development at North-East Bexhill (option C1) is the option that compares most favourably against SA objectives. It is regarded as the most appropriate location for major urban expansion of the town as it will secure vital new business land in an accessible location to the A21, A259, the urban area, the town centre, existing employment areas and areas of greatest job need. To this extent, it may be seen as strategically important. It supports sustainable development, is most acceptable in environmental terms and integrates well with proposals for green infrastructure. It is also most in line with the 6 point 'Rother and Hastings Councils' shared approach to future prosperity for the Hastings and Bexhill area, as set out in Section 7 of the Proposed Submission Core Strategy.

5.4.2z The West Bexhill option (C2) compares somewhat less favourably against SA objectives. It compares less favourably to North East Bexhill (C1) on most factors, but also slightly less favourably against North Bexhill (C3). North Bexhill (option C3) compares moderately to SA objectives. It slightly out-performs West Bexhill location,

but is not as sustainable a location as North East Bexhill, with the latter being clearly the most sustainable option.

5.4.2aa It is important to highlight that options will be subject to further refinement within the SA of the forthcoming Site Allocations DPD. At this point in time it is recommended that both North (Option C3) and West Bexhill (Option C2) be included within the Core Strategy as 'Broad Locations' for future development. Further exact quantum, if considered applicable would be a matter for the Site Allocations DPD.

## **Option (D) Bexhill – Scale of Growth**

<b>Option (D) Bexhill – Scale of Growth</b>
<b>Option D1 – Continue Scale and Rate of development proposed in Consultation on Strategy Directions (3,100 – 3,300 by 2026, or equivalent rate to 2028)</b>
<p><u>Conformity with other policy/initiatives: Conforms with South East Plan in terms of quantity, but arguably may result in non-conformity in terms of regeneration strategy and location of growth if development was directed towards other areas of Bexhill, instead of, or in advance of, NE Bexhill. The Highways Authorities have indicated that they do not believe that large new sites can be built ahead at NE Bexhill of the Link Road. Therefore a continued rate of development would inevitably result in alternative sites in the Bexhill area, that relate less well to Hastings, being prioritised ahead of NE Bexhill. Non-conformity with SE Plan policies that promote the economic and social regeneration of the Hastings/Bexhill area (and capitalise on Hastings as a regional hub) may therefore be the inevitable consequence of this option, with housebuilding not balanced by commensurate job growth.</u></p>
<p><u>Non-conformity: As above. Arguably may result in non-conformity with SE Plan in terms of regeneration strategy and location of growth if development was directed towards other areas of Bexhill instead of, or ahead of, NE Bexhill. SE Plan Policy SCT2 promotes the social and economic regeneration of areas in greatest need by continuing the support to Hastings/Bexhill. SE Plan policy SCT3 promotes the economic development potential of mixed-use sites at North East Bexhill. SE Plan policy SCT7 specifically identifies the 'Hastings - Bexhill area' as a focus for delivering economic and social regeneration, in order 'to develop and extend the work already undertaken in the 'Five Point Plan' into the longer term and to capitalise on Hastings as a regional hub'.</u></p>
<b>Option D2 – A lower rate of development than that anticipated in the Core Strategy 'Consultation on Strategy Directions', in recognition of changed circumstances. This will total 2,050-2,250 between 2011 and 2028 averaging 129 per year assuming development associated with link road from 2016</b>
<p><u>Conformity with other policy/initiatives: Conforms with South East plan in terms of regeneration strategy and location of growth, but does not meet SE Plan housing quantity targets.</u></p>
<p><u>Non-conformity: As above, does not meet SE Plan housing quantity targets.</u></p>
<b>Option D3 - A continuation of 'pre-link road' level of development (some 75 dwellings per year) throughout the plan period. In effect assuming the link road will not be constructed</b>
<p><u>Conformity with other policy/initiatives:</u></p>
<p><u>Non-conformity: South East Plan. Policies that emphasise the importance of meeting housing and development needs.</u></p>

## Option D: Commentary and Summary

5.4.2ab To date, the scale of development envisaged at Bexhill has been predicated upon early construction of the Bexhill to Hastings link road. Option D1 therefore reflects this previous programme as set out in the previous round of the Core Strategy - the 'Consultation on Strategy Directions'. Housing growth associated with option D1 averages 160 dwellings per year. The earlier 'Consultation on Strategy Directions' put forward 3,100 - 3,300 dwellings in the town over 20 years to 2026, but this assumed the Link Road would be open in 2012/13. With regard to Option D1, because the link road has, at best, been delayed since the 'Consultation on Strategy Directions' a continuation of the same level of development will inevitably result in a re-location of

development originally envisaged for north-east Bexhill to other alternative locations within the Bexhill area.

5.4.2ac Option D2 reflects the current programme that has emerged during the course of preparing the 'Proposed Submission' Core Strategy. The lower rate of development in option D2 equates to a housing target of some 2,050 - 2,250 new dwellings between 2011 and 2028, averaging 129 per year. Option D2 assumes a delay in the link road, with opening from late 2014/early 2015 with associated development from 2016. The delay in link road construction means it will be difficult to achieve the rate of development in Bexhill in the earlier parts of the plan period (since much development was Link Road dependent in North East Bexhill). Delay in opening the link road impacts on the overall quantum of housing growth, as the Highways Authorities have indicated that they do not believe that large new sites can be built in ahead of the Link Road.

5.4.2ad Option D3 assumes a continuation of 'pre-link road' level of development (some 75 dwellings per year) throughout the plan period. In effect assuming the link road will not be constructed. Hence this option also informs Policy OSS2 in the Core Strategy. The SA of Policy OSS2 in effect assesses the sustainability of a strategy with low development as a result of link road cancellation.

5.4.2ae To conclude: Generally growth will support regeneration, although limited capacity to grow economy quickly means that more houses may not complement wider regeneration goals, but instead reinforce retirement and deprivation characteristics of the respective towns. There is a difficulty in achieving the rate of development of employment uses pre-development of the link road. The weakened property market during the recession also lessens the prospects for a high level of house building.

5.4.2af Development at North East Bexhill offers the best opportunities to address deprivation and social exclusion. Therefore, housing development in advance of the Link Road would be in locations that would have reduced influence on this objective and also weaken the marketability of the North East Bexhill location once it does become available after link road completion (since a greater quantum of alternative housing options would have been made available elsewhere and Bexhill has a limited rate of growth it can achieve). Option D2 scores better than D1 against SA objectives. It also concurs with the Core Strategy objectives and strengthens the regeneration strategy for Hastings and Bexhill.

5.4.2ag Option D3 would not contribute towards the vision for a vital town (and District). It would have negative social and economic impacts and result in non-compliance with other policy and initiatives, most notably the South East Plan and local regeneration initiatives for Hastings and Bexhill. It would result in a significant housing shortfall vis-a-vis acknowledged needs.

## Options (E) Hastings Fringes Issues

Options (E) Hastings Fringes Issues	
<b>Option E1</b> – Continue with Scale of Development Identified in 'Consultation on Strategy Directions'	
<b>Conformity with other policy/initiatives:</b>	None, although contributes towards SE Plan housing targets.
<b>Non-conformity:</b>	Countryside Gap policy, PPS1, PPS7.

### Option E: Commentary and Summary

5.4.2ah At Core Strategy 'Consultation on Strategy Directions' stage Hastings Fringes was identified as suitable for some 200-450 dwellings and some 10,000 sq.m of business floorspace. In addition it proposed a new railway station in the Wilting area, 'if this is shown to be feasible'. The proposed submission Core Strategy refers to just 45-80 dwellings, but has removed policy reference to development at Breadsell, and an amended reference to 'at least 3,000sq.m of employment floorspace'. The housing and employment numbers have come down largely due the removal of the Breadsell site from the strategy (see option E1). However, it is also worth noting that doubts around sustainability and viability of the enabling development in the vicinity of Wilting also necessitate a more cautious approach. There may still be other smaller scale opportunities to provide housing and employment in the Hastings Fringes area, and the amended Core Strategy figures largely reflect this.

5.4.2ai It is important to note that with Option E the alternative is to 'not' continue with the scale of development identified at 'Strategy Directions' stage, for reasons outlined elsewhere in the SA (option B in particular). The alternative lower level of development is estimated at 45-80 dwellings and at least 3,000 sq.m of employment floorspace, drawing on the SHLAA and the Employment Strategy and Land Review. Therefore by implication, negative SA scores generally imply this lower level of development would be the more sustainable option, as elaborated upon further in the Table E1 of Appendix 5.

5.4.2aj The balance of assessments against SA Objectives suggests Breadsell would be an unsustainable development, although it is marginal. This is particularly the case in the absence of an accessible local shopping centre or school (now or planned). The fact that this will now no longer be coming forward in Hastings Borough Council has tipped the balance against this development in terms of SA Objectives. The absence of a clear commitment to a new station at Wilting, together with the severance of the Wilting development area, similarly weighs against it in sustainability terms.

5.4.2aj Background evidence in the form of the SHLAA indicated a relative lack of alternative sustainable development opportunities in the Hastings Fringes area that are of a strategic scale, which adds further doubt as to the achievability of the previously identified levels of development at Hastings Fringes.

## Option (F) Battle – Strategic Direction of Growth

<b>Option (F) Battle – Strategic Direction of Growth</b>
<b>Option F1 – Focus new allocations to the south-east of the town.</b>
<b>Conformity with other policy/initiatives:</b> <a href="#">Contribution towards SE plan housing quantity and acknowledged development needs.</a>
<b>Non-conformity:</b> Strategic Gap. Possible conflict with AONB objectives.
<b>Commentary and Summary:</b> Battle is not part of the Sussex Coast sub-region which influences the level of inter-dependent relationship it is expected to have with settlements that are within the Sub-Region. This limits the advantages of the South East of Battle vis-a-vis other sectors. Battle should be looking to a degree of self-containment given its significant service role.
<b>Option F2 – Focus new allocations both within the development boundary and via modest peripheral expansion opportunities (following further work as part of the Site Allocations DPD), with no particular focus on any side of the town.</b>
<b>Conformity with other policy/initiatives:</b> <a href="#">Contribution towards SE plan housing quantity and acknowledged development needs.</a>
<b>Non-conformity:</b> Possible conflict with AONB objectives.
<b>Commentary and Summary:</b> Analysis against the SA objectives shows relatively little between options F1 and F2. However it should be remembered that option F2 does not preclude development in the south-east of Battle, but offers a more flexible approach that may still include sites with the south-east. A further factor that tips the balance in favour of option F2 is that the existing commitment at Blackfriars will already result in a focus of development to the south east of Battle. To further entrench this trend would fail to acknowledge that in some respects (and hence for some households) the north and west are locationally preferable. A strategy that does not preclude their needs being met on balance would seem to be the correct one.

## Option (G) Rye - Scale of Growth

<b>Option (G) Rye - Scale of Growth</b>
<b>Option G1 – Continue Scale and Rate of Housing Development as set out in the Core Strategy 'Consultation on Strategy Directions' (or equivalent rate of development to 2028)</b>
<b>Conformity with other policy/initiatives:</b> South East Plan.
<b>Non-conformity:</b> Possible issues with PPS25, PPS9 and HRA

## Option G - Commentary and Summary

5.4.2ak It is important to note that with Option G the alternative is, by implication, to 'not' continue with the scale of development identified at 'Strategy Directions' stage. For reasons outlined elsewhere in the SA (option B in particular) and elsewhere in the Core Strategy and supporting evidence (The Rye Town Study in particular); the realistic alternative to option G1 is a lower level of development than that envisaged at 'Strategy Directions' stage. Therefore, by further implication, negative SA scores imply this lower level of development would be the more sustainable option.

5.4.2al The 'Strategy Directions' envisaged 450 dwellings over the period 2006 - 2026. The lower level envisages 250-350 dwellings and at least 10,000 sq.m of employment floorspace over the period 2011-2028 (note different timescales). There are many sustainability issues with the level of housing development formerly proposed within the Strategy Directions for Rye. The SHLAA demonstrated that even those individual sites considered suitable tend to be competing with other uses, have viability issues and almost universal issues of flood risk - and all three of these issues in some cases. Therefore a more cautious approach has been taken forward as outlined in the Rye chapter of the Proposed Submission Core Strategy and the Rye Town Study.



## 5.5 Overview of Options accepted and rejected, and reasons

5.5.1 The following table gives a brief overview of the options assessed, and the considerations given to them, in the previous section.

Option	Reason for acceptance or rejection
<b>Option (A) District-Wide Spatial Distribution</b>	
Option A1 – Re-distribute development deficit as a result of link road delay or cancellation, elsewhere within the district	Rejected - Although option A1 performs reasonably against the social and economic objectives and should deliver increased affordable housing, overall option A1 performs poorly on sustainability criteria compared to A2.
Option A2 – ‘Ring fence’ development in Bexhill and Hasting Fringes so that unavoidable changes such as link road delay / cancellation do not impact on required development levels elsewhere in the District	Accepted - While option A2 would result in a lower level of development across the District than option A1, it would allow a much greater degree of conformity with the SE Plan and local objectives for a shared economic vision with Hastings by prioritising development that complements this vision, as well as restricting the scale of development in the High Weald AONB to what has previously been recognised as consistent with its objectives.
<b>Option (B) District-Wide Scale of Growth</b>	
Option B1 – Continue South East Plan requirements of 280 per annum for 2006-2026 or 5,600 over the 20-year plan period (or equivalent rate of development to 2028)	Rejected – While option B1 performs better on housing and economic criteria, it performs poorly on more overall sustainability criteria compared to B2.
Option B2 – A Lower rate of development than that directed by the South East Plan, in recognition of changed circumstances	Accepted - option B2 is more likely to be matched by requisite job growth which is central to the local vision. It is also more likely to result in less pressure on critical environmental resources, notably the High Weald AONB, significant areas of flood risk and international and national nature conservation sites.
<b>Option (C) Bexhill – Strategic Direction of Growth</b>	
Option C1 – Focus new development to the north-east of the town.	Accepted - North-East Bexhill is assessed as the most appropriate location for major urban expansion of the town, as it will secure vital new business land in an accessible location to the A21, A259, the urban area, the town centre, existing employment areas and areas of greatest job need. To this extent, it may be seen as strategically important. It supports sustainable development, is most acceptable in environmental terms and integrates well with proposals for green infrastructure.
Option C2 – Focus new development to the west of the town	Accepted in part - this option compares somewhat less favourably against SA objectives than North East Bexhill (C1) on most factors, but also slightly less favourably against North Bexhill (C3). However, it is not overly constrained environmentally, albeit within reasonable proximity of international sites and within the hydrological catchment area of the Pevensey Levels, and enjoys good proximity to Little Common District centre (albeit relatively further afield from the higher order services in Bexhill and Hastings).
Option C3 – Focus new development to the north of the	Accepted in part - North Bexhill compares somewhat less favourably against SA objectives than North East Bexhill

<a href="#">town</a>	<a href="#">(C1) on most factors, but slightly out-performs West Bexhill location. Overall, it compares moderately to SA objectives. It is not overly environmentally constrained, and is relatively free of landscape issues. In terms of economic benefits, the area will have an improved accessibility to Hastings following completion of the Country Avenue. Therefore many of the economic and social benefits discussed in relation Option C1 will also apply, albeit to a lesser extent.</a>
<b>Option (D) Bexhill – Scale of Growth</b>	
<a href="#">Option D1 – Level of development proposed in Consultation on Strategy Directions (3,100 – 3,300 by 2026 or equivalent to 2028)</a>	<a href="#">Rejected – This option was predicated upon early construction of the Bexhill to Hastings link road. However, the link road has, at best, been delayed by 2 years, such that this level of housing is now unlikely to be matched by job growth, and hence not complement wider regeneration goals, but instead reinforce retirement and deprivation characteristics of the respective towns.</a>
<a href="#">Option D2 – A lower level of development (2,050 – 2,150 between 2011 and 2028) averaging 129 per year, assuming development associated with link road from 2016.</a>	<a href="#">Accepted – this option scores better than D1 against SA objectives and should contribute to the sustainable growth of Bexhill with complementary growth in housing and jobs.</a>
<a href="#">Option D3 – A continuation of ‘pre-link road’ level of development (some 75 dwellings per year) throughout the plan period. In effect assuming the link road will not be constructed</a>	<a href="#">Rejected – this option would not contribute towards the vision for a vital town (and District). It would have negative social and economic impacts for Hastings as well as Bexhill. It would result in a significant housing shortfall vis-a-vis acknowledged needs.</a>
<b>Option (E) Hastings Fringes Issues*</b>	
<a href="#">Option E1 – Continue with the scale of development identified in Core Strategy ‘Consultation on Strategy Directions’</a>	<a href="#">Rejected – Although option E1 will result in development and it’s associated economic, and to some extent social benefits. However it scores poorly against environmental criteria The sustainability of Breadsell (the largest site in Hastings Fringes) is limited due to the fact that neighbouring development will now no longer be coming forward on adjacent land in Hastings Borough Council, which further means that neither a local shopping centre or school will be present locally. The absence of a clear commitment to a new station at Wilting, together with the severance of the Wilting development area, similarly weighs against it in sustainability terms. Therefore a lower level of development is, by implication, the more sustainable option.</a>
<b>Option (F) Battle – Strategic Direction of Growth</b>	
<a href="#">Option F1 – Focus new allocations to the south-east of the town</a>	<a href="#">Rejected in part – The difference in SA scores between the two Battle options is marginal. However, the existing commitment at Blackfriars will already result in a focus of development to the south east of Battle. To further entrench this trend would fail to acknowledge that in some respects (and hence for some households) the north and west are locationally preferable. A strategy that does not preclude their needs being met on balance would seem to be the correct one.</a>



<u>Option F2 – Focus new allocations both within the development boundary and via modest peripheral expansion opportunities (following further work as part of the Site Allocations DPD), with no particular focus on any side of the town</u>	<u>Accepted – in rejecting F1 it is important to note that option F2 does not preclude development in the south-east of Battle, but offers a more flexible approach that may still include sites with the south-east.</u>
<b><u>Option (G) Rye – Scale of Growth*</u></b>	
<u>Option G1 – Continue Scale and Rate of Housing Development as set out in the Core Strategy 'Consultation on Strategy Directions' (or equivalent rate of development to 2028)</u>	<u>Rejected - Although option G1 will result in development and it's associated economic, and to some extent social benefits, it scores poorly against environmental criteria. Environmental constraints abound, and further evidence has cast doubt on the achievability of the targets within the 'Consultation on Strategy Directions'. Therefore the option is rejected in favour of a lower level of development (as detailed in section 5.2.5).</u>

\* Note: It is important to note that that with both Option E and Option G, the alternative option is, by implication, to 'not' continue with the scale of development identified at 'Strategy Directions' stage. In both cases this implies a lower level of development, for reasons outlined elsewhere in the SA (option B in particular). Therefore by implication, negative SA scores indicate that lower levels of development would be the more sustainable option.

## **5.6 Positive Aspects from the Options for the Strategy as a Whole**

5.6.1 Overall it is considered the different elements provide a cohesive sustainable strategy in line with the overall vision and in the light of Sustainability Appraisal objectives. The following Chapter 6 'Sustainability Appraisals of the Plan Policies' evaluates the plan policies in their entirety in the light of the SA Objectives. It includes an assessment of environmental, social and economic effects as well as of cumulative and synergistic effects.

## **6 SUSTAINABILITY APPRAISALS OF THE PLAN POLICIES**

### **6.1 Introduction**

- 6.1.1 Following on from the assessment of the main strategic options, those options that have been accepted have been used to form the Plan policies. Consultation has also provided valuable input into the formation of the Plan Strategies. This has included Council officers, elected Members and with key stakeholders (Town and Parish Chairmen and Clerks, utilities and infrastructure providers) on the synopsis of the Core Strategy.
- 6.1.2 The SA has assessed the effects of the emerging strategies alongside their evolution. This has been necessary as a result of the iterative nature of the development of the Core Strategy, and policies undergoing editorial and presentational changes.

### **6.2 Significant social, environmental and economic effects of the Plan [Strategies Policies](#)**

- 6.2.1 Each of the Plan [Strategies policies](#) has been assessed against the SA Objectives in Appendix 6.
- 6.2.2 A summary of the significant social, environmental and economic effects of the principal [strategies policies](#) is presented below by SA Objective,

**Table 6.1** Crude Summary Appraisal of Introductory and Spatial Policies

Sustainability Appraisal Objectives	OSS1 Overall Spatial Strategy	OSS2 Link Road	OSS3 Dev Boundaries	OSS4 Loc of Dev	OSS5 Gen Dev Considerations	BX1 Bex Overall Strat	BX2 Bex TC	BX3 Dev Strat	HF1 Hastings Fringes	RY1 Bye	BA1 Battle	RA1 Villages	RA2 Gen Strat for C'side	RA3 Dev in the C'side	RA4 Trad Historic Farm Bldgs
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 the fear of crime	(✓)	~	~	~	(✓)	(✓)	~	(✓)	~	~	~	~	~	~	~
4. Reduce deprivation and social exclusion	(✓)	✓	~	~	(✓)	✓	(✓)	(✓)	(✓)	✓	(✓)	(✓)	(✓)	(✓)	(✓)
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	(✓)	(✓)	~	~	(✓)	~	~	~	~	~	(✓)	~	~	~
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	✓	✓	~	~	~	✓	✓	✓	~	✓	(✓)	(✓)	(✓)	(✓)	✓
7. Improve accessibility to services and facilities for all ages across the District	✓	(✓)	✓	✓	~	(✓)	(✓)	~	~	(✓)	(✓)	✓	~	~	~
8. Encourage and facilitate increased engagement in cultural and leisure activities	(✓)	~	(✓)	(✓)	~	(✓)	✓	~	~	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)
9. Improve efficiency in land use and encourage the prudent use of natural resources	(✓)	~	✓	✓	✓	(✓)	(✓)	~	~	~	~	~	(✓)	(✓)	(✓)
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(x)	~	(✓)	(✓)	~	~	(✓)	~	~	~	(x)	(x)	~	~	(x)
11. Reduce emissions of greenhouse gases	~	~	(✓)	(✓)	~	~	~	~	~	(x)	(x)	~	~	~	~
12. Minimise the risk of flooding and resulting detriment to people and property	~	~	~	(✓)	(✓)	~	~	(✓)	~	(x)	(✓)	(✓)	~	~	~
13. Maintain, improve and manage water resources in a sustainable way	~	~	(✓)	(✓)	(✓)	~	~	~	~	~	~	(✓)	~	~	~
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	(✓)	(x)	(✓)	(✓)	(✓)	~	~	~	(✓)	(x)	(✓)	(✓)	~	(✓)	(✓)
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	(✓)	(x)	~	✓	✓	(✓)	(✓)	~	(✓)	~	(✓)	(✓)	✓	✓	?
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	(x)	~	(✓)	~	~	~	?	~	~	~	~	~	~	~	~

**Table 6.2 Crude Summary Appraisal of Core Policies**

Sustainability Appraisal Objectives	SRM1 Towards a Low Carbon Future	SRM2 water management	C01 Community Facilities & Services	C02 Healthcare Facilities	C03 Sport & Recreation	C04 Young People	C05 Older People	C06 Community Safety	LHM1 Mixed & Balanced Communities	LHM2 Affordable Housing	LHM3 Rural Exception Sites	LHM4 - Wholly or Substantially AH	LHM5 G&T	LHM6 G&T Criteria	EMP 1 Econ Activity and Growth	EMP2 Bus Land & Premises	EM 3 Existing Emp Sites	EMP 4 Business Elsewhere	EMP5 Key Sectors	EMP6 Tourism	EMP7 Retail	EN1 Retail	EN2 Historic Blt Env	EN3 Design Qual	EN4 Public Realm	EN5 Biodiversity	EN6 Flood Risk Man	EN7 Flood Risk & Dev	TR1 Stratg Access	TR2 Integrated Trans	TR3 Access & New Dev	TR4 Car Parking	IM1 Monitoring	
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 the 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	✓	(✓)	~	~	~	(✓)	~	~	~	~	~	~	~	~	✓	✓	✓	✓	✓	✓	(✓)	~	~	(✓)	(✓)	~	~	~	✓	✓	~	(✓)	(✓)	
7. Improve accessibility to services and facilities for all ages across the District	(✓)	~	✓	✓	✓	✓	✓	(✓)	~	~	~	~	~	~	(✓)	~	(✓)	~	~	~	✓	~	~	~	~	~	~	~	✓	✓	✓	✓	(✓)	
8. Encourage and facilitate increased engagement in cultural and leisure activities	(✓)	~	✓	~	✓	✓	✓	~	~	~	~	~	~	~	~	~	~	~	~	✓	~	✓	✓	~	~	✓	~	~	~	~	~	~	~	(✓)
9. Improve efficiency in land use and encourage the prudent use of natural resources	✓	✓	~	~	(✓)	~	~	~	(✓)	~	~	~	~	~	(x)	x	✓	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)	✓	(✓)	(✓)	
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	✓	✓	~	✓	✓	(✓)	(✓)	✓	~	~	~	~	~	~	(x)	(x)	~	~	~	x	✓	~	~	~	(✓)	✓	~	~	(✓)	✓	✓	✓	✓	(✓)
11. Reduce emissions of greenhouse gases	✓	(✓)	~	~	✓	~	~	~	~	~	~	~	~	~	(x)	(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 by protecting both designated and non-designated but locally important species and habitats	✓	(✓)	~	~	✓	~	~	~	~	~	~	~	~	(✓)	~	~	~	~	(✓)	(x)	~	(✓)	~	~	~	✓	(✓)	(✓)	(x)	(✓)	~	~	~	(✓)
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High	✓	~	~	~	✓	~	~	(✓)	~	~	(x)	~	~	(✓)	?	?	(✓)	(✓)	(✓)	?	✓	✓	✓	✓	✓	✓	(✓)	(✓)	(x)	(✓)	(✓)	(✓)	(✓)	(✓)
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	✓	✓	~	~	~	~	~	~	~	~	~	~	~	~	~	~	~	(✓)	(✓)	(x)	~	~	~	~	~	~	~	~	~	~	~	~	~	(✓)

1. Ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home
- 6.2.3 The significant effects on this SA Objective are beneficial and will potentially be from the Overall Spatial Strategy, Bexhill and Local Housing Needs policies. The Distribution Strategy seeks to deliver most of the requirements in the South East Plan, though delay to the link road in particular means it is no longer possible to deliver 100%.
- 6.2.4 The policies for Bexhill should deliver strategic sites for major housing growth and it promotes the housing needs of younger people. The policies for Rye, Battle and the Rural Areas all contribute to the overall provision of housing in the District.
- 6.2.5 The policies for Local Housing Needs has a strong focus on improving the range, quantity and affordability of housing. This includes making provision for affordable housing to address local need, easier access to housing for younger people, greater emphasis on small, cheaper housing, bringing forward a range of suitable housing and meeting responsibilities in terms of appropriate provision for Gypsies and Travellers.
- 6.2.6 The Strategy for sustainable Resource Management is beneficial for this SA Objective in respect of achieving sustainably constructed homes.
2. Improve the health and well-being of the population and reduce inequalities in Health
- 6.2.7 Similarly potential for the most significant beneficial effects on the health SA Objective will be from the Overall Spatial Strategy, Bexhill, Local Housing Needs and Communities policies. The reason for this is largely connected to the links between good quality, affordable housing and health and well-being.
- 6.2.8 The Bexhill Strategy specifically calls for investment in quality open space, improved access to leisure and health facilities and improved access to health and training programmes alongside the major housing provision identified.
- 6.2.9 The Local Housing Needs Strategy aims to provide suitable housing to meet all types of local need. The Communities section makes clear the need to promote healthy lifestyles through improved provision of accessible, high quality recreation space. The strategy also addresses health inequalities through promoting the importance of ease of access to doctor's surgeries.

### 3. Reduce crime and the fear of crime

6.2.10 This SA Objective is mainly affected by the Communities section (and community safety policy in particular), which promotes working with partner authorities to address issues of crime and disorder and should help lead to significant beneficial effects for reducing crime and the fear of crime.

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

### 4. Reduce deprivation and social exclusion

6.2.12 Most policies have been judged to have a beneficial effect, either minor or significant, on reducing deprivation and social exclusion. Significant beneficial effects on reducing deprivation and social exclusion should be experienced as a result of the implementation of the policies on Economy and those which provide affordable housing such as Overall Spatial Strategy and Local Housing Needs.

6.2.13 The Economy policies promote improved employment opportunities and particularly those that offer vocational training elements and opportunities to up-skill, which should help reduce deprivation. Economic regeneration within the coastal sub-region should help address deprivation issues in Bexhill and Rye.

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

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

6.2.15 Other policies in combination may also lead to significant beneficial effects for raising educational attainment (including Bexhill) and this will be highlighted in the cumulative effects section.

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

6.2.16 Collectively the policies within the Core Strategy have a strong economic focus, as directed by the South East Plan in order to raise the economic profile of the region and particularly to deliver economic regeneration to the Sussex Coast Sub-Region.

- 6.2.17 Strategies for the Overall Spatial Strategy, Bexhill, Battle, Rye, the Rural Areas and for the Economy have all been assessed as having potential for significant beneficial effects for sustaining economic growth and competitiveness.
- 6.2.18 The Overall Spatial Strategy aims to promote economic regeneration in Bexhill and support, with development, the market town roles of Rye and Battle. It also permits development in the countryside which explicitly serves to promote sustainable land-based industries and sensitive diversification to sustain the rural economy. The Strategy also considers the long term prospects for the smaller villages and settlements in the countryside.
- 6.2.19 The policies for Bexhill have a strong economic focus seeking to provide new employment space in the town centre and Sidley and additional retail floorspace in the town centre. Providing the transport capacity and particularly the road link should also support the businesses operating in the area and attract new investment. In aiming to help younger people onto the housing ladder and therefore remain or move to the area the Strategy supports economic growth by helping to maintain the workforce.
- 6.2.20 The policy for Battle should enable new employment opportunities and growth in tourism. This coupled with the provision of new retail floorspace and better road and rail connections to London, Tunbridge Wells and Hastings as well as improved traffic movements across town should contribute to beneficial effects for the local economy.
- 6.2.21 The economy of Rye is central to the Strategy for Rye. As well as an increase in general economic opportunities and better road and rail connections the policy explicitly concerns itself with the commercial viability of the Port of Rye and the importance of the increasing commercial activity and associated sea-faring interest to sustain this important local industry.
- 6.2.22 There is a strong economic focus to the Rural Areas section, which supports initiatives and facilities that improve local business, farming and other land-based activities, local agricultural enterprise and diversity and tourism.
- 6.2.23 Many aspects of the economy and workforce are addressed through the Economic section. The provision of suitable land and premises, support for local business and enterprise, economic regeneration and the encouragement of growth and high-tech industries.
- 6.2.24 In improving access to jobs and improving the strategic transport infrastructure the Strategy for Transport and Accessibility is supporting economic growth by facilitating access to jobs for the workforce and making the District more attractive to businesses. The strategy is also supporting the tourism economy with consequent prosperity improvements.



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

6.2.25 Potential for the most significant beneficial effects on improving accessibility within the District is from the Bexhill and Transport & Accessibility policies. Other strategies including that for Rye and the Overall Spatial Strategy should have beneficial effects but are not judged to be as significant – details of proposed mitigation and likely cumulative effects can be found in later sections.

6.2.26 The Bexhill section promotes the development of a wide ranging sustainable transport strategy, alongside improved transport capacity, providing for major growth in accessible locations and improved community infrastructure, which should collectively have beneficial effects for this SA Objective.

6.2.27 The whole focus of the Transport and Accessibility section is to improve accessibility to services and facilities for all ages across the District; by prioritising strategic transport infrastructure and improvements to the public transport network and the development of safe pedestrian and cycle routes the strategy is making transport inclusive for all.

8. Encourage and facilitate increased engagement in cultural and leisure Activities

6.2.28 The policies for Bexhill, Battle, Rye and the Economy (particularly Tourism) have been judged to give rise to beneficial effects for increased engagement in cultural and leisure activities.

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

6.2.29 There is a level of uncertainty in predicting the effects of the strategies on the prudent use of natural resources, partly due to actual locations for development not having been determined at this stage.

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

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

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

6.2.32 The policies for Transport and Accessibility have been judged to have a beneficial effect for this SA Objective. The strategy is contributing to increasing travel choice by non-car modes and aims to reduce road congestion by improving the strategic transport infrastructure within the District. This has to be balanced against the fact that increasing development and increasing population (particularly from younger demographics) may inevitably increase congestion over time. The strategy may help promote sustainable choices in transport but ultimately has limited control over human behaviour and people may simply choose to carry on using the private car as their preferred choice of transport.

11. Reduce emissions of Greenhouse gases

6.2.33 The Overall Spatial Strategy is not likely to reduce greenhouse gas emissions as it has a strong development focus. An increase in the number of households and businesses in the District has the potential for a significant adverse effect on reducing greenhouse gas emissions. Other areas of policy (cross-cutting) will help to ensure sustainable construction which should limit the generation of new greenhouse gas emissions.

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

6.2.34 There are uncertainties for the effects on this SA Objective linked to the policy for Rye. Whilst the Strategy for Rye gives full recognition to future sea-level rise and flood risk, it concentrates on defending Rye to recognised standards but does not couple this with total avoidance of the floodplain. Most of Rye is sited within Flood Zone.

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

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

6.2.36 The level of development proposed through the Bexhill Strategy will undoubtedly require additional water supply and wastewater infrastructure to meet the demand arising. Managing demand involves encouraging installation of water conservation measures such as low flow taps, showers, low flush toilets and water butts. Even with mitigation in place this strategy has the potential for significant adverse effects on improving the management of water resources. The Strategy has been assessed as having uncertain effects on this SA Objective as information on the implementation of such significant growth is not found within the strategy.

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

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

6.2.38 Priority habitats have been promoted by policy for Biodiversity and Greenspace, including commitment to creation and enhancement of habitat alongside development and identifying a strategic greenspace network. The effects are therefore judged to be beneficial with potential for significant beneficial effects.

6.2.39 The section for Bexhill has some beneficial aspects for biodiversity including the multifunctional greenspace associated with the urban fringe; however much of the proposed open space is to be managed for public enjoyment and not necessarily purely for its biodiversity value.

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

6.2.40 The Environment policies bring the primary benefits to this area, although the spatial strategies also give careful consideration to it, particularly the Rural areas section.

6.2.41 The section on the Environment leads with Landscape Stewardship and seeks to place high quality design centrally in the planning process. This should have significant beneficial effects for this SA Objective.

6.2.42 There is uncertainty surrounding the effects of the policies for the Economy on the SA Objective to protect and enhance the built and natural environment. The appearance of business/industrial parks and employment sites can often jar with the surrounding landscape and great care should be taken in the siting of new employment areas. Other cross-cutting policy on design should protect and help enhance the high quality built and natural environment

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

6.2.43 The policies that result in development is assessed as having potentially adverse effects on the SA Objective to reduce waste generation. Even with the highest levels of sustainable construction and most effective development distribution patterns the level of development required will ultimately result in

increased numbers of households and businesses and consequently increased waste generation. Need to ensure sustainable waste management within design of new developments to increase recycling and composting rates.

- 6.2.44 Achieving sustainable development requires the consideration of waste issues and implementation of site waste management plans which monitor and set targets for waste in order to promote resource efficiency.

### 6.3 Cumulative and Synergistic Effects

- 6.3.1 Table 6.2 documents the cumulative and synergistic effects of the [Preferred Strategies Plan policies](#). Where the Strategies have been qualified by 'minor' in brackets the effects are less significant but are contributing to cumulative and synergistic effects.

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

- Reduce Road Congestion
- Reduce Emissions of Greenhouse Gases

[6.3.2a However it is important to note that they are also influenced to a large extent by policies and regulations beyond the realm of the Core Strategy. For example, the ESCC Local Transport Plan; or through the implementation of national initiatives such as the code for sustainable homes through building regulations.](#)

[6.3.2b In most cases cumulative affects become more apparent over the course of the plan period and over the long term. For example, positive effects of reducing deprivation or ensuring everyone has the opportunity to live in a sustainably constructed and affordable home may take time to take effect as development progresses throughout the plan period. To this effect, policies concerned with the overall provision of development, amenities and facilities \(e.g. OSS1, BX1, BX2, BX3, EC2, BA1, RY1 and RA1\) are policies whose implementation will be fully realised by the end of the plan period. The same can be said of policies \(e.g. LHN1, LHN2, LHN3 and LHN5\) concerned with ensuring a balanced and sustainable provision of housing.](#)

[6.3.2c Equally the positive effects of policies \(e.g. OSS3, OSS4, OSS5, EC3, EC5, EC6, EC7, EN policies, TR1, TR2\) and their role in guiding sustainable development and preserving the quality of our townscape and landscape, will become apparent in the medium and longer term, since the damaging effects of unsustainable piecemeal development may not be immediately felt but become apparent as a result of their cumulative influence.](#)

6.3.2d The positive effects of policies that have a 'development management role' (e.g. RA3, RA4 and EC3) may also be felt in the more immediate short-term as their result of their influence on the day to day decision making processes of the planning authority.

- 6.3.3 It is true to say that where an SA Objective has several clauses the policies can go further in addressing some components of the Objective more than others. For example, the SA Objective to ensure everyone has the opportunity to live in a decent, sustainably constructed and affordable home has several components: housing provision; affordability of housing; decentness in terms of quality; and a requirement to be sustainably constructed. To further this example, ~~the Strategy for the Environment~~ environmental policies can address two components, the quality in terms of design and sustainable construction, but cannot address overall provision or affordability.
- 6.3.4 Another example of multiple components is the SA Objective for waste: one aspect deals with reducing waste generation and the other deals with achieving sustainable management of waste. Various Strategies have an adverse effect on reducing waste generation but can, albeit in some instances with an element of mitigation, contribute to achieving sustainable management of waste, for example, through improved design to include recycling and composting facilities, requirements for waste management plans and requirements for minimising construction waste.

**Table 6.3** Cumulative and Synergistic Effects of the Plan [Strategies Policies](#)

Sustainability Appraisal Objectives	Assessment	Plan Policies
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	( √ )	Housing, Strategic Resource Managemnt, Young People, Battle, Villages, Overall Spatial Strat (minor), Bexhill (minor)
2. Improve the health and well-being of the population and reduce inequalities in health	( √ )	Healthcare, Sport & Rec, Young People, Older People. Spatial & Housing Policies (mostly minor)
3. Reduce crime and the fear of crime	( √ )	Community Safety. Overall Spatial Strat & Others (minor)
4. Reduce deprivation and social exclusion	√	Link Road, Bexhill, Rye, Economy, Housng, Healthcare, Services
5. Raise educational achievement levels and develop the opportunities for lifelong learning	( √ )	Economic Growth, Community Facilities, Young People.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	( √ )	Transport, Economy, Young People, Bexhill, Link Road, Overall Spatial Strategy
7. Improve accessibility to services and facilities for all ages across the District	( √ )	Overall Spatial Strategy, Development Boundaries, Transport, Retail.
8. Encourage and facilitate increased engagement in cultural and leisure activities	( √ )	Community Facilities, Sport & Recreation, Young People, Older People.
9. Improve efficiency in land use and encourage the prudent use of natural resources	( √ )	Low Carbon, Water Management, Overall Spatial Strategy, Development boundaries, Location of Development
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	Services and Facilities, Transport, Retail. Risk of negative from employment.
11. Reduce emissions of greenhouse gases	~	Low Carbon Future, Key Services.
12. Minimise the risk of flooding and resulting detriment to people and property	( √ )	Flood risk
13. Maintain, improve and manage water resources in a sustainable way		Water management. Risks of negative from Rye and Bexhill.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	( √ )	Biodiversity
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	( √ )	Rural, Environment, Location of Development, General Development Considerations.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	<a href="#">Low Carbon Future</a> , Water management, key services.

- 6.3.5 Reducing road congestion may be achievable through certain strategies but this would not necessarily ensure air quality in the District as a whole continues to improve. This may be because over time new roads and linkages that initially relieve congestion have the effect, in combination with new development, of generating traffic and increasing overall car levels in the District and consequently air pollution. Strategies that aim to improve economic growth including within the tourism sector are likely to bring more traffic into the District, which due to road improvements, may not contribute to congestion but would contribute to overall emissions and pollution levels.
- 6.3.6 Similarly increasing travel choice may not result in reduced car usage given the habits and propensity of car use of people living in rural areas. Whilst a strategy can influence the availability of alternative forms of transport thereby facilitating more sustainable modes of transport than the car, a strategy cannot necessarily make people change their habitual arrangements.



## **7 PROPOSED MITIGATION MEASURES**

### **7.1 Introduction**

7.1.1 This chapter, in accordance with the SEA Directive, SEA and SA guidance, looks at mitigation measures designed to prevent, reduce or offset the significant adverse environmental, social and economic effects of the Plan Strategies. Mitigation measures can also include recommendation for enhancing the beneficial effects of strategies. Mitigation measures are wide-ranging and can include:

7.1.2 Some of the Plans, Policies or Initiatives considered most crucial are discussed below.

### **7.2 Core Strategy Policies**

7.2.1 The following policies are considered to have a key role in limiting potentially damaging impacts of the plan as a whole.

#### SRM1: Towards a low carbon future

7.2.2 Particularly the requirement for larger scale developments to produce a comprehensive energy strategy and ensuring all developments meet energy efficiency standards. Support for stand-alone and low carbon energy generation schemes is also important and the identification of NE Bexhill as suitable for CHP and/or other forms of renewable energy. The provision of green infrastructure (as also covered by Policy EN5) may also be an important mitigating factor.

#### SRM2: Water Management

7.2.3 Considering the capacity issues of the water companies in relation to development and ensuring development does not have an adverse effect groundwater source protection zones. Application of sustainable drainage systems (as discussed further below).

#### Policy EN5 Biodiversity and Green Space

7.2.4 There are many positive elements in terms of enhancing and creating green space with biodiversity benefits, including alongside new development. A particularly positive mitigation measure will be the establishment of the Pebsham Countryside Park in an area of acknowledged need for strategic open space (as referenced in the ESCC Strategic Open Space Study).

7.2.5 In addition it is important to note that extensive background site based evidence that has informed the Strategy and overall development strategies has fully considered biodiversity in terms of statutory and non statutory designations (e.g.

Biodiversity Action Plan habitats and local to Sussex habitats, records of protected species, etc).

#### Policy EN6, EN7 Flood Risk Issues

7.2.6 In accordance with the following;

- South Foreland to Beachy Head Shoreline Management Plan
- Folkestone to Cliff End Flood and Erosion Management Strategy;
- Rother and Romney Catchment Flood Management Plan,
- Cuckmere and Sussex Havens Catchment Flood Management Plan;
- Nature conservation and biodiversity interests such as RAMSAR, SAC, SPC, LNR or SSSI.

7.2.7 In addition it is important to note that extensive background site based evidence that has informed the Strategy and overall development strategies has fully considered flood risk in terms of flood zones and the Council's SFRA (e.g. highways and sewerage flooding incidents).

#### Policy TR2 Integrated Transport

7.2.8 Prioritising bus, rail and a high quality cycle network.

#### Policy CO3 Improving Sports and Recreation Provision

7.2.9 Includes the provision of

1. Natural & semi-natural open space
2. Green Corridors
3. Beaches and coastal areas

7.2.10 In terms of 1 and 2, the policy aims to safeguard existing and to secure new provision in areas of deficit (including with reference to Pebsham Countryside park). As such this policy also has potential to mitigate any damaging sustainability effects of the Core Strategy.

#### Other Policies

7.2.11 It is also important to note that mitigation measures are not limited to the above policies. Many of the spatial policies also have a key mitigating role, in terms of supporting and protecting sustainable transport, local amenities, facilities, open space and green infrastructure. Examples include BX1, BX2, HF1, RY1, BA1 and RA1.

7.2.12 Policies CO1 Community Facilities and Services and CO2 Healthcare Facilities have key positive mitigating roles in respect of a number of SA objectives, including 2, 4 and 7. Policies CO4 and CO5 concerned with younger and older members of the community respectively are important in addressing SA Objectives 4, 5, 7 and 8. All EN and TR policies have positive mitigating roles to some extent.

### **7.3 Other Statutory Documents**

- 7.3.1 Reference may also be made to proposed mitigation with the ESCC Local Transport Plan and its supporting LATs (in terms of encouragement of sustainable transport options and modal shift, measures to address congestion); and the ESCC Waste & Minerals Local Plan/LDF (in terms of waste reduction, promotion of sustainable resource management, etc).

## 8 IMPLEMENTATION

### 8.1 Introduction

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

### 8.2 Links to other tiers of plans and programmes and the project level

- 8.2.1 The Core Strategy Policy Directions document makes reference to a number of LDDs both existing and subsequent. The Council has recently revised its LDS and developed a list of documents that will be incorporated into the LDF. Specifically the SA has identified links between certain strategies and such LDDs:

☐ **Development and Site Allocations (future) DPD** potentially linked to all policies, although the 'site allocations' element is particularly linked to the following spatial strategies:

- o Overall Spatial Strategy
- o Bexhill
- o Hastings Fringes
- o Battle
- o Rye
- o Rural Areas

☐ **North East Bexhill 'Master plan' SPD** linked to the following strategy:

- o Bexhill
- o Transport and Accessibility
- o Economy
- o Sustainable Resource Management

☐ **Affordable Housing SPD (Adopted)** linked to the following strategies:

- o Local Housing Needs

☐ **Community Infrastructure Levy (CIL) SPD** – forthcoming. To be linked to the following strategies:

- o Transport and Accessibility
- o Economy (with respect to education)
- o Environment (with respect to open and green space provision and habitat mitigation)

### 8.3 Proposals for Monitoring

- 8.3.1 The specific requirements of the SEA Regulations on monitoring are to:  
*“Monitor the significant environmental effects of the implementation...with the purpose of identifying unforeseen adverse effects at an early stage” (Regulation 17(1))”*
- 8.3.2 The sustainability framework (Appendix 2) is a good starting point for developing targets and indicators for monitoring. However, monitoring for the SA can be part of the wider monitoring process for the LDF, using a subset of the overall monitoring objectives (as set out in the Annual Monitoring Report). The SEA Regulations specifically state that monitoring for SEA can be incorporated into other monitoring arrangements (Regulation 17(2)), and therefore will be combined with the annual monitoring proposals for the LDF.
- 8.3.3 Monitoring need only begin once the LDF has been adopted and implementation begun. Therefore, a monitoring framework for the SA need not be agreed until the monitoring framework for the LDF is in place.

# APPENDICES





## Appendix 1: Updated Baseline Data

Explanatory Note: This is an update of Appendix 2 'Baseline Data' of the June 2008 Scoping Report

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

#### Additional homes built, 2006-2009

Year	2006/07	2007/08	2008/09	2006-2009
Geography				
East Sussex	1,533	1,820	1,435	4,788
Rother	414	426	200	1,040

Source: ESCC residential monitoring database

#### Affordable homes built, 2004-2009

Year	2004/05	2005/06	2006/07	2007/08	2008/09
Geography					
East Sussex	66	125	182	74	170
Rother	20	3	95	46	15

Source: ESCC residential monitoring database

#### Proportion of homes built that are affordable, 2004-2009

Year	2004/05	2005/06	2006/07	2007/08	2008/09
Geography					
East Sussex	4.3	8.3	11.9	4.1	11.8
Rother	7.1	1.2	22.9	10.8	7.5

Source: ESCC residential monitoring database

#### Household projections, 2008-2026

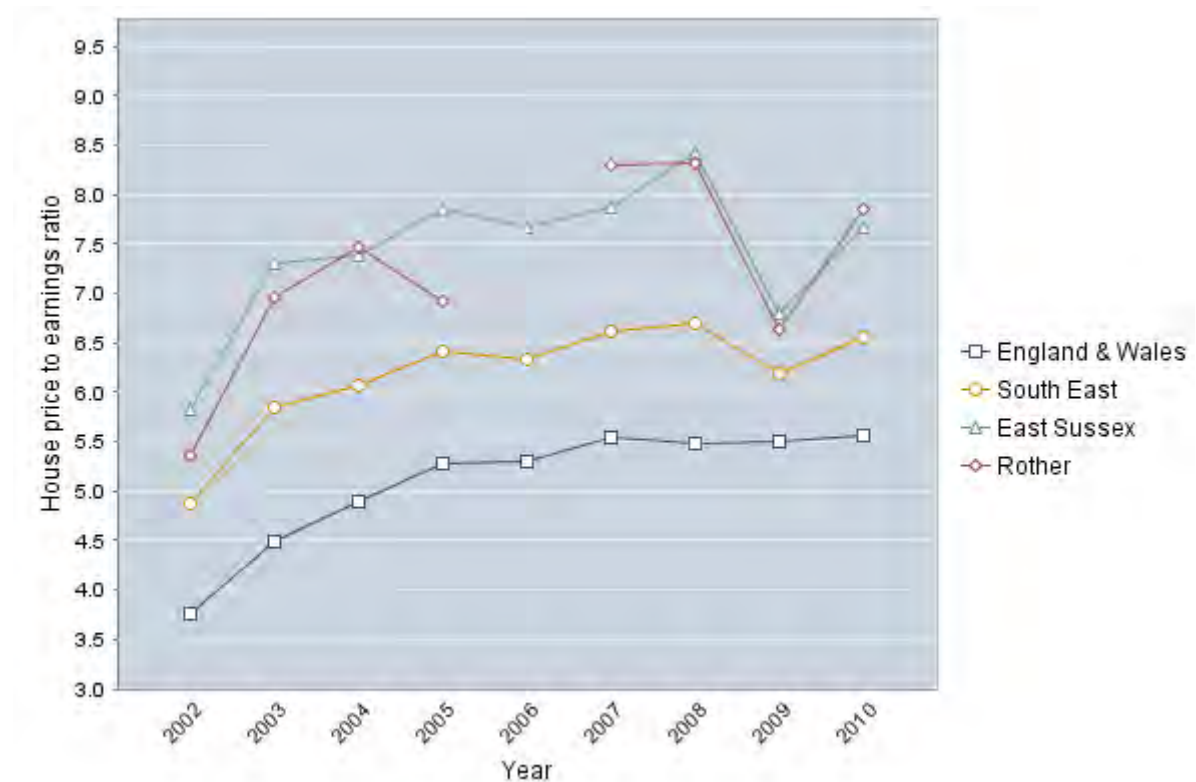
Year	2008	2011	2016	2021	2026
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Rother District Council [Proposed Submission Core Strategy](#) Sustainability Appraisal [\(incorporating focused amendments\)](#)

Geography					
East Sussex	227,065	230,790	238,231	244,167	250,101
Rother	40,301	40,851	42,338	43,528	44,722

Source: ESCC projections

### House price to earnings ratio, 2002-2010



Source: HM Land Registry and ONS

### Households on the waiting list, 2006-2010

Year	2006	2007	2008	2009	2010
Geography					
England	1,634,301	1,674,421	1,770,116	1,763,140	1,751,982
South East	195,700	208,419	203,161	205,371	215,373
East Sussex	10,969	12,416	11,068	12,167	10,781
Rother	1,398	1,362	1,542	1,689	1,933

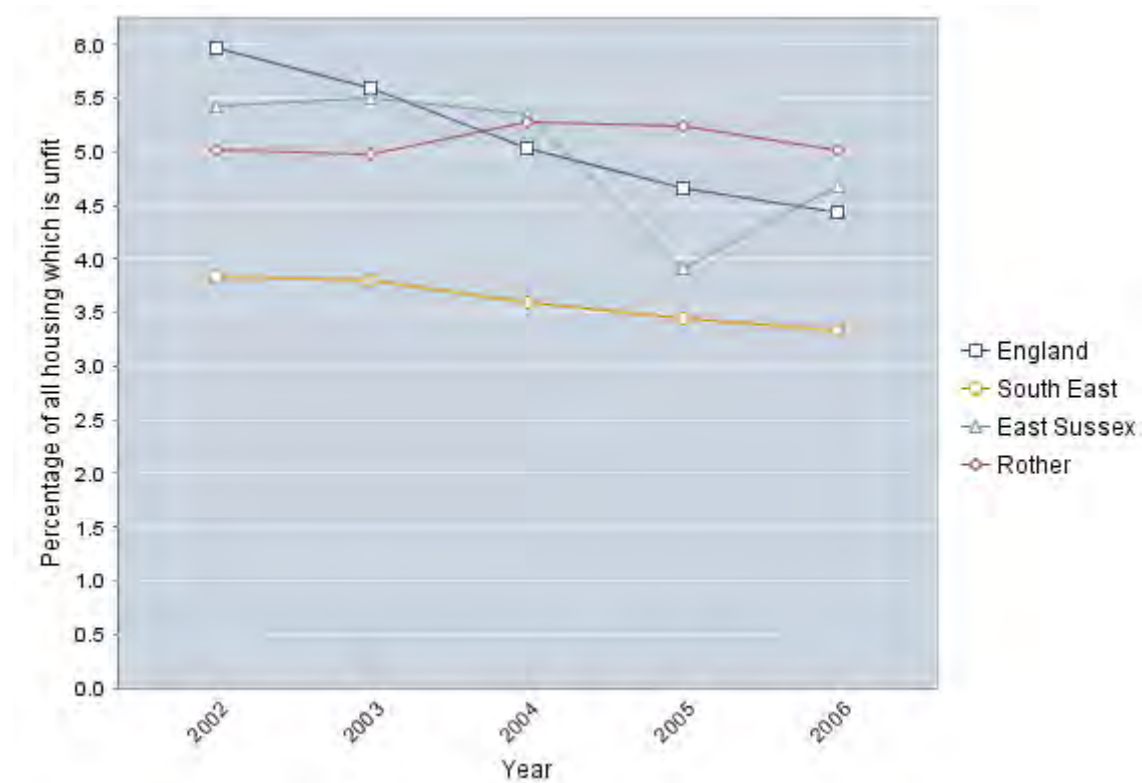
Source: Department for Communities and Local Government (DCLG)

### Homeless households accepted in priority need each year, 2005-2010

Years	2005/06	2006/07	2007/08	2008/09	2009/10
Geography					
England	93,980	73,360	63,170	53,430	40,020
South East	9,330	6,660	5,510	4,730	3,870
East Sussex	876	648	550	461	255
Rother	90	47	35	31	23

Source: Department for Communities and Local Government (DCLG)

### Unfit housing, 2002-2006



Source: Department for Communities and Local Government (DCLG)

### Population growth, 2001-2009

Year	2001	2009	Population growth 2001-2009 - percent
Geography			
England & Wales	52,359,978	54,809,060	4.7
South East	8,023,449	8,435,718	5.1
East Sussex	493,130	512,088	3.8
Rother	85,471	89,222	4.4

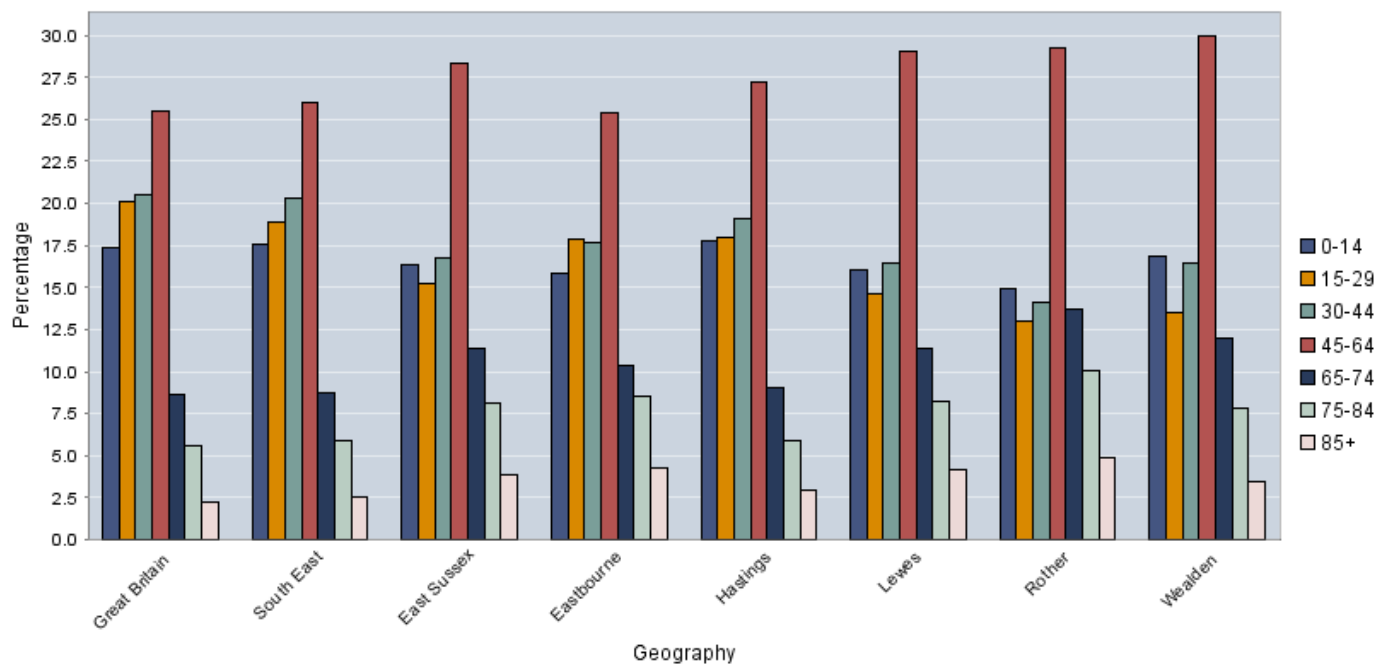
Source: ONS

## Population projections, 2008-2026

Year	2008	2026	Population growth 2008-2026 - percent
Geography			
East Sussex	511,092	521,496	2.0
Rother	89,499	92,174	3.0

Source: ESCC projections

## Age Structure



Source: CACI

## SA Objective 2: Improve the health and well-being of the population and reduce inequalities in health

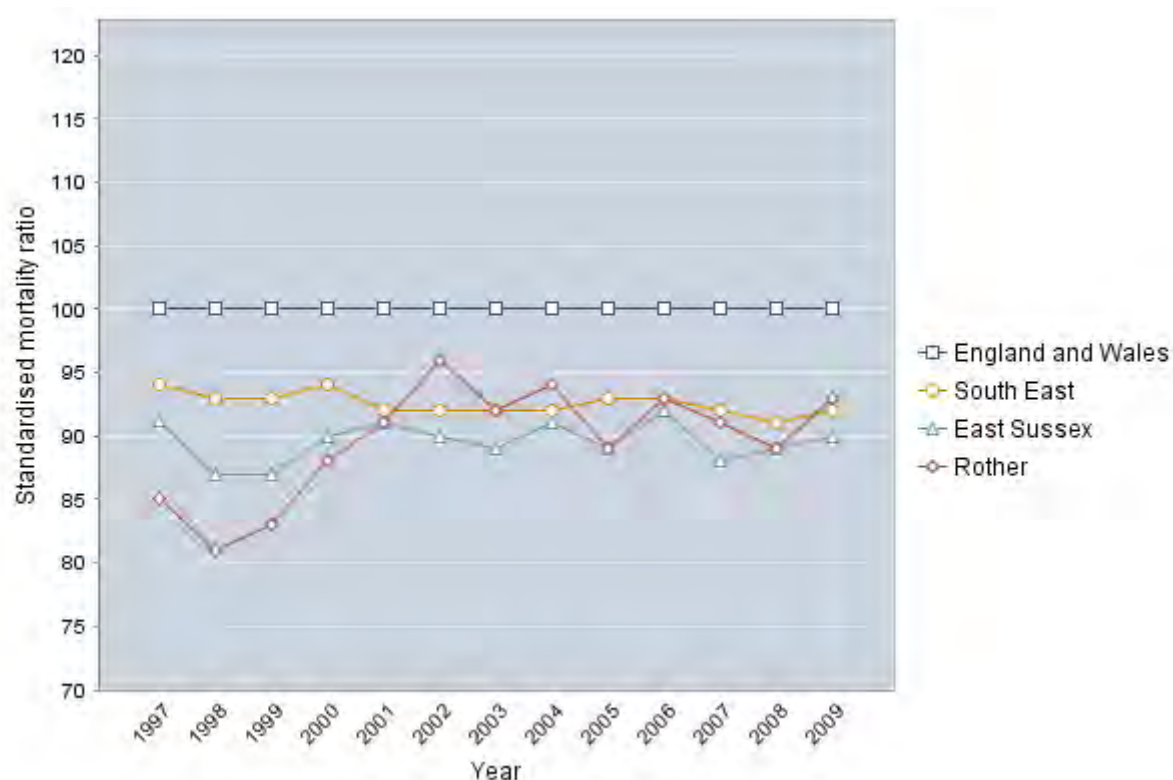
### Life expectancy at birth, 2003-2009

Year	2003-2005		2004-2006		2005-2007		2006-2008		2007-2009	
Gender	Males	Females	Males	Females	Males	Females	Males	Females	Males	Females
Geography										
England and Wales	76.8	81.1	77.2	81.5	77.5	81.7	77.8	82.0	78.1	82.2
South East	78.1	82.0	78.5	82.4	78.9	82.7	79.2	83.0	79.4	83.3
East Sussex	-	-	-	-	78.8	82.8	79.2	83.0	79.5	83.5
Rother	77.8	82.1	78.2	82.5	79.0	82.8	79.3	83.1	79.5	83.4

Source: ONS



## Standardised Mortality Rates, 1997-2009



Source: ONS

## Percentage of people with limiting long term illness

Age group	All people	Aged 0-15	Aged 16- pensionable age	Aged pensionable age and over
Geography				
East Sussex	18.6	4.4	13.0	41.9
Rother	20.5	4.5	13.7	40.7

Source: ONS

## % Population within 20 minutes of sports facilities

Years	December 2006	June 2007	November 2007
Geography			
East Sussex	30.9	34.4	34.6
Rother	27.3	25.7	27.6

Source: Sport England

## SA Objective 3: Reduce crime and the fear of crime

Rother District Council [Proposed Submission Core Strategy](#) Sustainability Appraisal ([incorporating focused amendments](#))

### Satisfaction with the local area as a place to live, 2006-2009 (%)

Level of satisfaction	Very and fairly satisfied	
Year	2006/07	2008/09
Geography		
East Sussex	80.6	84.1
Rother	83.4	86.3

Source: Ipsos Mori, Place Survey

### Police recorded crimes, 2007-2010

Crime	Offences per 1,000 population		
Year	2007/08	2008/09	2009/10
Geography			
England and Wales	91.2	84.5	76.6
South East	80.6	74.5	68.0
East Sussex	70.6	61.7	53.9
Rother	58.9	48.5	40.6

Source: Home Office

### % residents that feel fairly or very safe after dark

Level of satisfaction	Very and fairly safe	
Year	2006/07	2008/09
Geography		
East Sussex		57
Rother	46	61

Source: Ipsos Mori, Place Survey

### % residents that feel fairly or very safe during the day

Level of satisfaction	Very and fairly safe	
Year	2006/07	2008/09
Geography		
East Sussex		91
Rother	89	92.5

Source: Ipsos Mori, Place Survey

Year	2003/04		2004/05		2005/06	
Time of day	During the day	After dark	During the day	After dark	During the day	After dark
Geography						
England average	97.5	70.6	97.6	72.3	97.2	70.2
Sussex Police Authority	97.3	70.4	98.6	72.6	98.1	71.7

Source: Home Office, British Crime Survey

## **SA Objective 4: Reduce deprivation and social exclusion**

Rother District Council [Proposed Submission Core Strategy](#) Sustainability Appraisal [\(incorporating focused amendments\)](#)

### Population of working age claiming out of work benefits, 2006-2010 (%)

Quarter	May-06	May-07	May-08	May-09	May-10
Geography					
Great Britain	11.8	11.3	11.0	12.7	12.4
South East	7.8	7.5	7.3	8.9	8.7
East Sussex	10.3	10.0	10.1	11.6	11.6
Rother	9.9	9.6	9.6	11.4	11.1

Source: NOMIS, ONS

### Population of working age claiming key benefits, 2006-2010 (%)

Quarter	May-06	May-07	May-08	May-09	May-10
Geography					
Great Britain	13.9	13.4	13.2	14.9	14.7
South East	9.4	9.2	9.1	10.7	10.7
East Sussex	12.3	12.0	12.2	13.8	13.9
Rother	12.1	11.7	11.9	13.8	13.7

Source: NOMIS, ONS

## Households in fuel poverty in 2008

Households	All households	Households in fuel poverty	Households in fuel poverty - percent
Geography			
England	21,407,233	3,334,615	15.6
South East	3,450,282	342,381	9.9
East Sussex	222,650	27,779	12.5
Rother	39,296	5,857	14.9

Source: Department of Energy and climate Change (DECC)

## Average household income, 2008-2010

Average	Mean income £			Median income £		
Year	2008	2009	2010	2008	2009	2010
Geography						
Great Britain	34,417	35,006	35,299	28,698	29,363	28,445
South East	38,637	39,231	40,239	32,685	33,291	33,232
East Sussex	33,532	34,395	34,569	28,334	29,153	28,164
Rother	31,811	32,939	32,768	26,983	28,029	26,678

Source: CACI

## Indices of multiple deprivation

Measure of deprivation	Average Rank of 326 local authority districts in England (1=most deprived area) 2004	Average Rank of 326 local authority districts in England (1=most deprived area) 2007	Average Rank of 326 local authority districts in England (1=most deprived area) 2010
Geography			
Rother	181.0	163.0	132.0

Source: Department of Communities and Local Government (DCLG)

## SA Objective 5: Raise educational achievement levels and develop the opportunities for lifelong learning

### Students achieving 5 or more GCSEs grade A\*-C in 2009

Subject	5 or more passes at grades A*-C	5 or more passes at grades A*-C (including maths and English)
Geography		
All areas	71.4	50.6
East Sussex	71.9	51.1
Rother	68.5	50.9

Source: ESCC, Children's Services Department

### Qualifications of working age population, 2009

Qualifications	Qualified to at least level 4	Qualified to at least level 3	Qualified to at least level 2	Qualified to at least level 1	Other qualifications	No qualifications
Geography						
Great Britain	29.9	49.3	65.4	78.9	8.8	12.3
South East	32.6	52.6	69.0	83.0	7.8	9.1
East Sussex	29.5	50.3	69.3	84.6	7.5	7.9
Rother	31.1	49.2	64.6	78.2	9.5	12.2

Source: ONS, Annual Population Survey

## % students 16+ in full time education

Economic activity		All students	Economically active	Economically inactive
Geography	Age group			
England and Wales	0-15 years	75.5	0.0	75.5
	16-18 years	12.4	4.5	7.9
	19 years and over	12.1	4.4	7.7
South East	0-15 years	75.9	0.0	75.9
	16-18 years	13.0	5.6	7.4
	19 years and over	11.1	4.1	7.0
East Sussex	0-15 years	79.2	0.0	79.2
	16-18 years	13.7	6.1	7.6
	19 years and over	7.1	2.8	4.4
Rother	0-15 years	79.9	0.0	79.9
	16-18 years	13.8	5.9	7.9
	19 years and over	6.3	2.2	4.1

Source: Office for National Statistics, 2001 Census, Table CS063



## SA Objective 6: Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities

### % long term unemployed

Month		May-10	Jun-10	Jul-10	Aug-10	Sep-10	Oct-10	Nov-10	Dec-10	Jan-11	Feb-11	Mar-11	Apr-11
Geography	Duration												
East Sussex	Up to 6 months	56.2	54.7	57.3	58.7	60.4	62.7	64.7	66.4	67.1	68.5	68.6	67.7
	6 months to 1 year	23.0	23.0	20.3	19.0	17.8	15.7	14.2	13.5	14.3	14.3	15.2	16.2
	1 to 2 years	17.0	17.8	17.4	17.1	16.3	15.9	15.0	14.0	12.7	11.5	10.6	10.2
	2 to 3 years	3.0	3.5	4.0	4.2	4.5	4.7	4.8	4.8	4.5	4.3	4.3	4.4
	Over 3 years	0.8	0.9	1.0	1.0	1.0	1.1	1.3	1.3	1.4	1.4	1.4	1.5
Rother	Up to 6 months	55.0	53.7	56.2	58.0	61.6	62.1	64.9	65.4	65.1	66.9	65.7	64.1
	6 months to 1 year	24.8	23.9	21.1	19.7	16.8	16.7	14.4	14.8	15.2	15.3	17.1	17.0
	1 to 2 years	16.9	18.7	18.9	17.9	16.8	16.3	15.1	14.5	13.8	12.8	11.9	12.3
	2 to 3 years	2.2	2.6	2.6	3.3	3.7	3.8	4.4	4.2	4.5	3.9	3.8	5.1
	Over 3 years	1.1	1.1	1.1	1.1	1.1	1.1	1.1	1.1	1.4	1.1	1.4	1.4

Source: ONS/NOMIS

### Unemployment rate, 2005-2010

Time period	Sep-05	Sep-06	Sep-07	Sep-08	Sep-09	Sep-10
Geography						
Great Britain	4.8	5.4	5.3	5.3	7.4	7.7
South East	3.7	4.4	4.2	4.3	5.6	6.0
East Sussex	4.0	5.2	4.1	4.5	6.0	6.2
Rother	3.1	4.5	4.2	4.5	5.4	5.9

Source: ONS, Annual Population Survey

### GVA per person

Year	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008
------	------	------	------	------	------	------	------	------	------	------	------	------	------	------

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Geography															
United Kingdom	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100
South East	102	103	104	106	107	108	108	108	108	108	108	108	107	106	106
East Sussex	76	76	75	73	72	73	74	74	74	75	74	73	70	68	

Gross value added (GVA) per head indices at current basic prices

Source: ONS

### Local business units, 2007 and 2008

Year	2007	2008
Geography		
Great Britain	2,406,300	2,446,000
South East	390,000	395,600
East Sussex	23,000	22,800
Rother	4,000	4,000

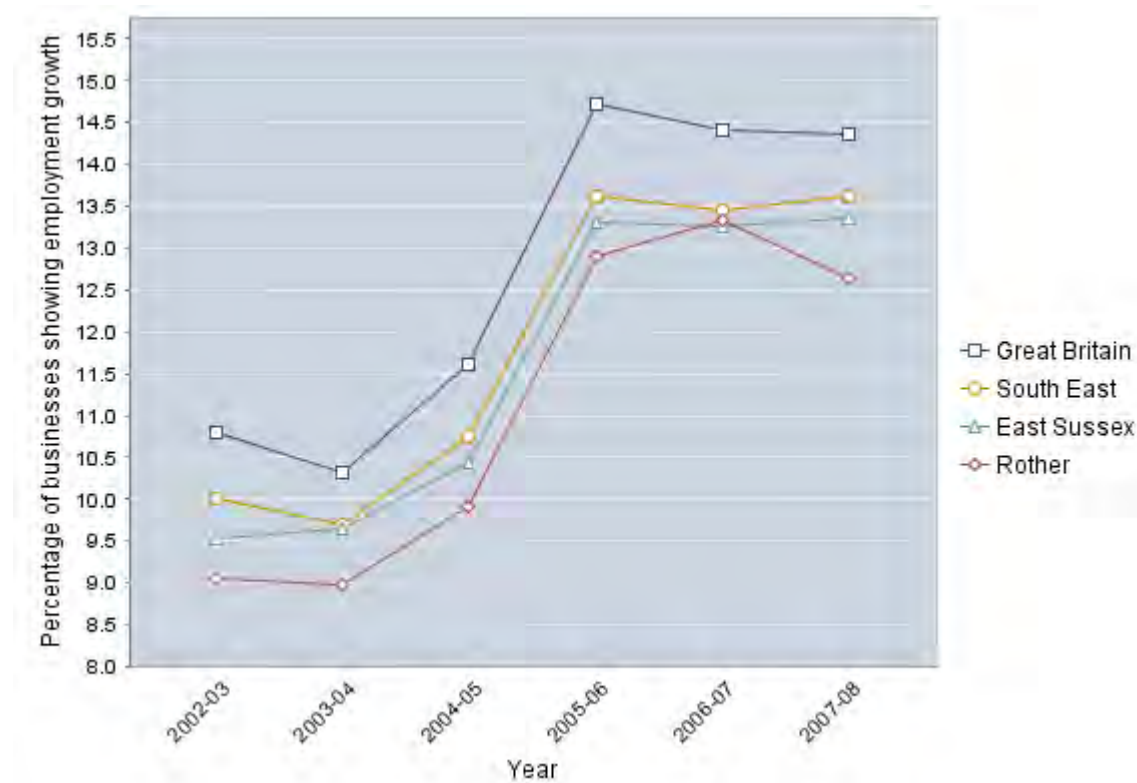
Source: ONS

### Employment rate, 2005-2010

Year	Apr 2005-Mar 2006	Apr 2006-Mar 2007	Apr 2007-Mar 2008	Apr 2008-Mar 2009	Apr 2009-Mar 2010
Geography					
Great Britain	72.5	72.5	72.6	72.0	70.3
South East	77.2	76.6	76.7	76.4	74.5
East Sussex	74.4	74.6	75.4	73.7	74.0
Rother	80.3	76.8	71.3	72.4	72.7

Source: ONS, Annual Population Survey

### Small businesses showing employment growth, 2002-2008 (%)



Source: Department for Business, Innovation and Skills (BIS)

### Tourism business turnover

Year	2009
Rother	
Turnover for Local Businesses	£262,542,000
Total spent by all visitors	£221,264,000

Source: Tourism South East

## Business start up and closures

Age of business		Total	Less than 2 years	2 - 3 years	4 - 9 years	10 or more years
Geography	Year					
East Sussex	2004	15,015	2,620	4,300	2,435	5,660
	2005	15,215	2,535	2,115	4,000	6,560
	2006	15,360	2,325	2,290	4,060	6,690
	2007	15,585	2,420	2,170	4,210	6,785
	2008	20,665	3,065	2,935	6,090	8,575
	2009	20,465	2,690	2,890	6,075	8,810
	2010	19,995	2,450	2,615	5,930	9,000
Rother	2004	2,835	460	765	455	1,150
	2005	2,850	450	380	730	1,290
	2006	2,895	400	415	770	1,305
	2007	2,950	425	410	800	1,315
	2008	3,855	565	505	1,110	1,675
	2009	3,765	445	505	1,100	1,715
	2010	3,690	400	455	1,080	1,755

Source: Office for National Statistics (ONS)/Inter Departmental Business Register (IDBR).

## Loss of employment land to retail

Year	2009/2010
Geography	
Rother	0

Source: AMR 2010

## Permissions for B class uses

2010	Ward	Gross Area (ha)	Greenfield/PDL	Use Class	Site Status
Site					
Land East & West of Link Road Bexhill	Sidley & Old Town	16	Greenfield	B1/ B2/ B8	LP Allocation
R/o Culverwells, Robertsbridge.	Salehurst	1.0	Greenfield	B1	LP Allocation
Land off Burgess Road The Ridge,	Marsham	1.0	Greenfield	B1	LP Allocation
Land west of DB Earthmoving, Marley Lane, Battle.	Ewhurst and Sedlescombe	0.6	Greenfield	B1	LP Allocation
Rutherfords Business Park, Marley Lane, Battle	Battle Town	0.7	Greenfield	B1	LP Allocation
Castle Water, Rye Harbour Road, Rye	Eastern Rother	0.8	PDL	B1/ B2/ B8	LP Allocation
Wheel Farm Business Park, Westfield	Brede Valley	0.3	Greenfield	B1	LP Allocation
Longs Products Rye Harbour Road, Rye	Eastern Rother	2.2	PDL	B1/ B2/ B8	LP Allocation
Homestead Farm, Brightling	Darwell	0.05	Greenfield	B1a	Outstanding Planning Permission
Advartex LTD, Ticehurst	Ticehurst and Etchingham	0.24	PDL	B1c	Outstanding Planning Permission
Rye Wharf, Harbour Road, Rye	Eastern Rother	4.65	PDL	B1/ B8	Outstanding Planning Permission
Johns Cross Garage Battle Road, Mountfield	Darwell	0.46	PDL	B1/ B8	Outstanding Planning Permission
Watts Palace Farm, Ewhurst	Ewhurst and Sedlescombe	1.4	Greenfield	B1a/ B2/ B8	Outstanding Planning Permission
Old Mears Site, Harbour Road, Rye Harbour	Eastern Rother	0.43	PDL	B8	Outstanding Planning Permission
Woodland Enterprise Centre, Hastings Road, Flimwell	Ticehurst and Etchingham	0.35	Greenfield	B1/B2	Site under Construction
Blackman, Pavie & Ladden Site, Marley Lane, Battle	Battle Town	1.9	PDL	B1/B8	Site under Construction
Sidley Goods Yard	Sidley	1.25	PDL	B1	Site under Construction
Land adj. To Beechdown Sawmills, North Trade Road	Battle Town	0.37	PDL	B1	Site under Construction
Bugsell Mill Farm Hurst Green	Salehurst	0.13	Greenfield	B1	Site under Construction
Ox Lodge Farm Building, Brightling Road, Brightling	Darwell	0.13	Greenfield	B1/B8	Site under Construction
<b>Total</b>		<b>33.96</b>			

Source: RDC Annual Monitoring Report 2010

## SA Objective 7: Improve accessibility to services and facilities for all ages across the District

### % New development within 30 minutes public transport of services and facilities

Year	2007/8	2008/9	2009/10
Geography			
Rother	10	11*	11*

\*99% meet all but A&E hospital criteria.

Source: Annual Monitoring Report. Only Measured at a Local Level

### Percentage Completed retail, office & leisure development in town centres

Year	Town Centres			Local Authority Area			% in Town Centres		
		Gross	Net		Gross	Net		Gross	Net
Rother									
2009/10	A1	60	60	A1	236	236	A1	25	25
	A2	0	-84	A2	0	-84	A2		100
	B1a	0	-16	B1a	55	33	B1a	0	-48
	D2	0	0	D2	0	0	D2		
	Total	60	-40	Total	291	185	Total	21	-22

Source: Annual Monitoring Report. Only Measured at a Local Level. Prior to 2009/10 a 100 sq.m threshold was applied to data collection, and prior to this a 1000 sq.m threshold was applied to data collection. This resulted in no data being recorded.

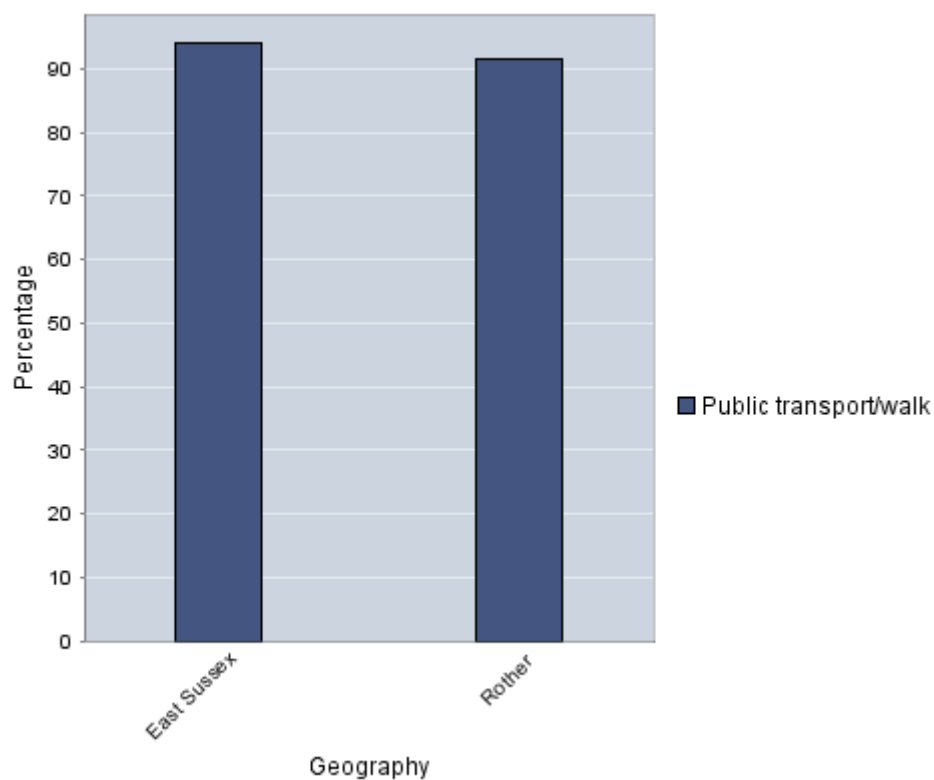
### Working age people with access to employment centres, 2007-2009 (%)

Year	2007	2008	2009

Geography			
East Sussex	79.1	79.2	78.7
Rother	75.1	73.6	72.9

Source: Department for Transport, Core Accessibility Indicators

### Households within 30 minutes access by public transport/walk to town centres, 2009 (%)



Source: Department for Transport, Core Accessibility Indicators

### Internet connection in 2010

Adults	All adults over 18	Adults with internet connection at home - percent
Geography		



Great Britain	43,796,146	74.4
South East	6,022,135	76.5
East Sussex	382,169	68.5
Rother	69,216	63.7

Source: CACI

## SA Objective 8: Encourage and facilitate increased engagement in cultural and leisure activities

### Satisfaction with sport & leisure facilities

Level of satisfaction	Very and fairly satisfied	
Year	2006/07	2008/09
Geography		
East Sussex	60.4	41.1
Rother	57.8	33.7

Source: Ipsos Mori, Place Survey

### Satisfaction with theatres/concert halls

Level of satisfaction	Very and fairly satisfied	
Year	2006/07	2008/09
Geography		
East Sussex	50.7	46
Rother	40	32

Source: Ipsos Mori, Place Survey

### Satisfaction with museums/galleries

Level of satisfaction	Very and fairly satisfied	
Year	2006/07	2008/09
Geography		
East Sussex	38.3	39
Rother	68.7	47

Source: Ipsos Mori, Place Survey

## Visits to museums/galleries in Rother per 1000 population

Frequency of visits	%
Rother	
Almost every day	0
At least once a week	2
About once a month	8
Within the last 6 months	18
Within the last year	16
Longer ago	21
Never used	35

Source: Ipsos Mori, Place Survey

## **SA Objective 9: Improve efficiency in land use and encourage the prudent use of natural resources**

### Previously developed land in 2007

Previously developed land types	Land allocated in a local plan or with planning permission - percent	Vacant and derelict land - area in hectares	Total previously developed land - area in hectares
Geography			
England	28.6	33,600	62,120
South East	52.7	2,900	8,990
East Sussex	62.2	113	311
Rother	11.6	26	30

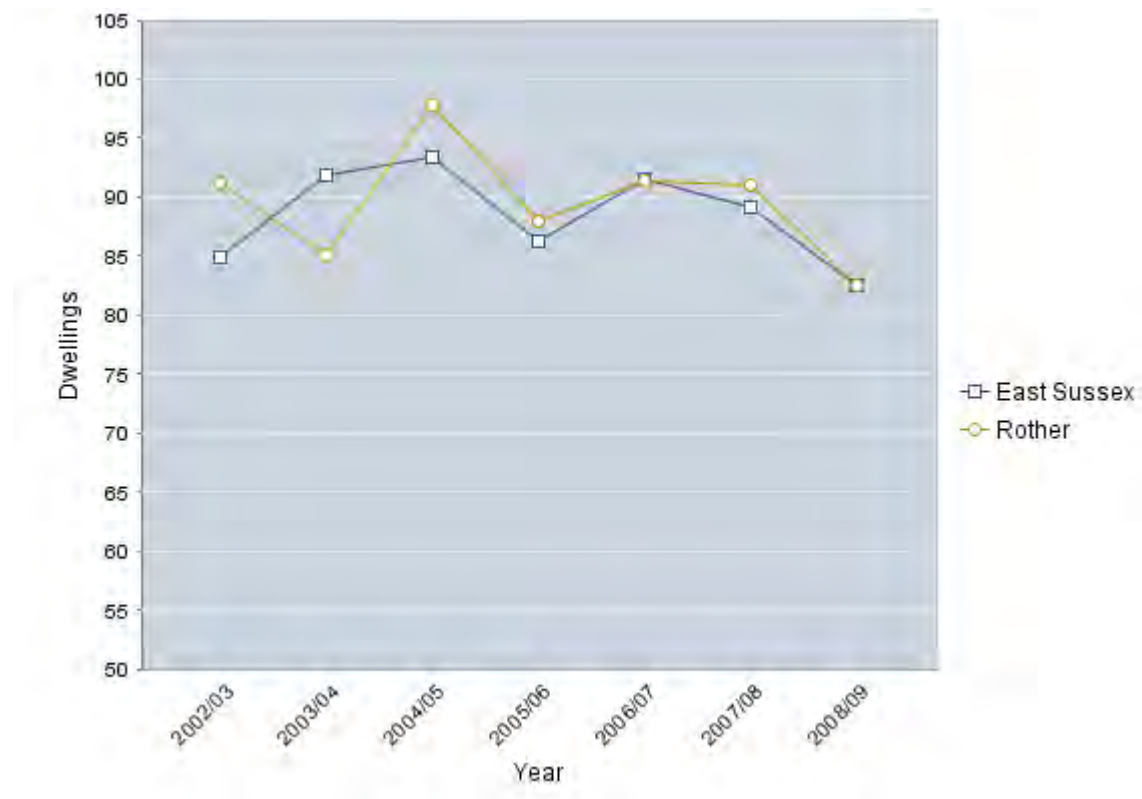
Source: National Land Use Database

## Vacant private sector dwellings returned to occupancy

vacant private sector dwellings returned to occupancy	2009/10	2010/11
Geography		
Rother	8	16

Source: RDC Housing

## Additional homes built on previously developed land, 2002-2009 (%)



Source: ESCC Residential Monitoring Database

Industrial and commercial consumption of gas and electricity, 2005-2008  
(annual average in KWh)

Energy source	Electricity				Gas			
Year	2005	2006	2007	2008	2005	2006	2007	2008
Geography								
Great Britain	78,223	81,876	79,077	79,809	645,050	605,218	633,779	644,556
South East	68,568	73,069	71,499	71,984	506,024	422,413	443,648	459,966
East Sussex	37,348	39,699	38,142	38,044	350,292	362,944	369,149	355,834
Rother	35,091	36,555	37,075	35,451	696,411	818,374	786,052	685,016

Source: Department of Energy & Climate Change

Domestic consumption of gas and electricity, 2005-2008 (annual average in KWh)

Energy source	Electricity				Gas			
Year	2005	2006	2007	2008	2005	2006	2007	2008
Geography								
Great Britain	4,606	4,457	4,392	4,198	19,020	18,241	17,614	16,906
South East	4,891	4,780	4,741	4,543	18,994	18,322	17,799	17,022
East Sussex	4,798	4,728	4,673	4,505	18,171	17,440	16,734	15,946
Rother	5,077	4,978	4,905	4,738	19,626	18,863	18,150	17,265

Source: Department of Energy & Climate Change

### Total energy consumption, 2005-2007 (GWh)

Year	2005	2006	2007
Geography			
Great Britain	1,700,324	1,671,383	1,618,470
South East	235,632	224,812	229,415
East Sussex	10,938	10,818	10,740
Rother	2,295	2,291	2,221

Source: Department of Energy & Climate Change

### **SA Objective 10: Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage**

### Number of AQMAs

Year	2011
Geography	
Eastbourne	0
Hastings	1
Lewes	1
Rother	0
Wealden	0

Source: Department for Environment Food and Rural Affairs

### Background levels of air pollutants

Pollutants	Benzene	Nitrogen dioxide	Particulate matter	Sulphur dioxide	Ozone
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			(NO2)	(PM10)	(SO2)	
Location		Background	Background	Background	Background	Background
Geography	Year					
Rother 001	2004	1	1	4	1	6
	2005	1	2	5	1	7
Rother 002	2004	1	1	4	1	6
	2005	1	1	5	1	6
Rother 003	2004	1	1	4	1	6
	2005	1	1	5	1	7
Rother 004	2004	1	1	4	1	6
	2005	1	1	5	1	6
Rother 005	2004	1	1	5	1	6
	2005	1	2	5	1	7
Rother 006	2004	1	1	4	1	6
	2005	1	2	5	1	8
Rother 007	2004	1	2	5	1	6
	2005	1	2	5	1	8
Rother 008	2004	1	2	5	1	6
	2005	1	2	5	1	8
Rother 009	2004	1	2	5	1	6
	2005	1	2	5	1	8
Rother 010	2004	1	2	5	1	6
	2005	1	2	5	1	7
Rother 011	2004	1	2	5	1	6
	2005	1	2	5	1	7

Source: Department for Environment Food and Rural Affairs

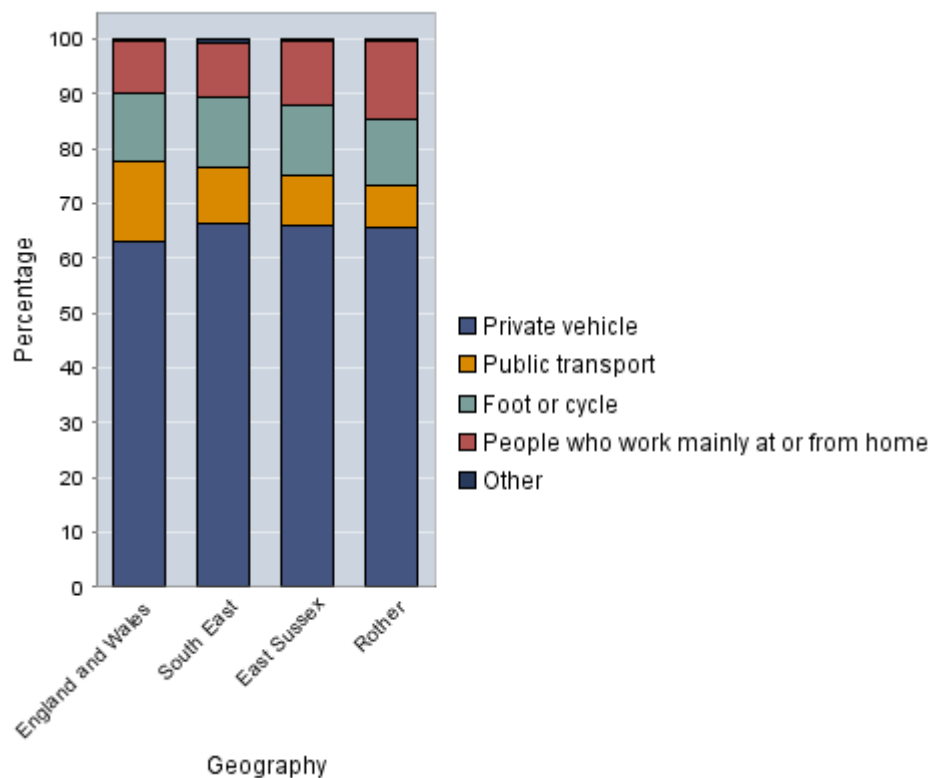


### Residents by distance travelled to work in 2001

Distance travelled to work	Less than 5km	5km-20km	Over 20km	Working at or from home	Other
Geography					
England	40.1	33.5	12.6	9.2	4.7
South East	38.0	28.9	17.8	9.9	5.5
East Sussex	39.1	24.8	17.8	11.6	6.7
Rother	32.2	28.8	17.4	14.2	7.4

Source: 2001 Census, ONS

### Residents by mode of travel to work in 2001



Source: 2001 Census, ONS

### Quality of Rights of Way

Paths Easy To Use	2001/02	2002/03	2003/04	2004/05	2005/06	2006/07
Geography						
East Sussex	63.5%	63.6%	67.9%	72.2%	66.5%	52.8%

Source: ESCC Rights of Way Improvement Plan 2007 - 2017

### Residents commuting flows in 2001

Commuting flow	Live and work in district	In-commuters	Out-commuters	Net commuters
Geography				
East Sussex	164,380	16,380	48,659	-32,279
Rother	19,704	8,254	14,078	-5,824

Source: 2001 Census, ONS

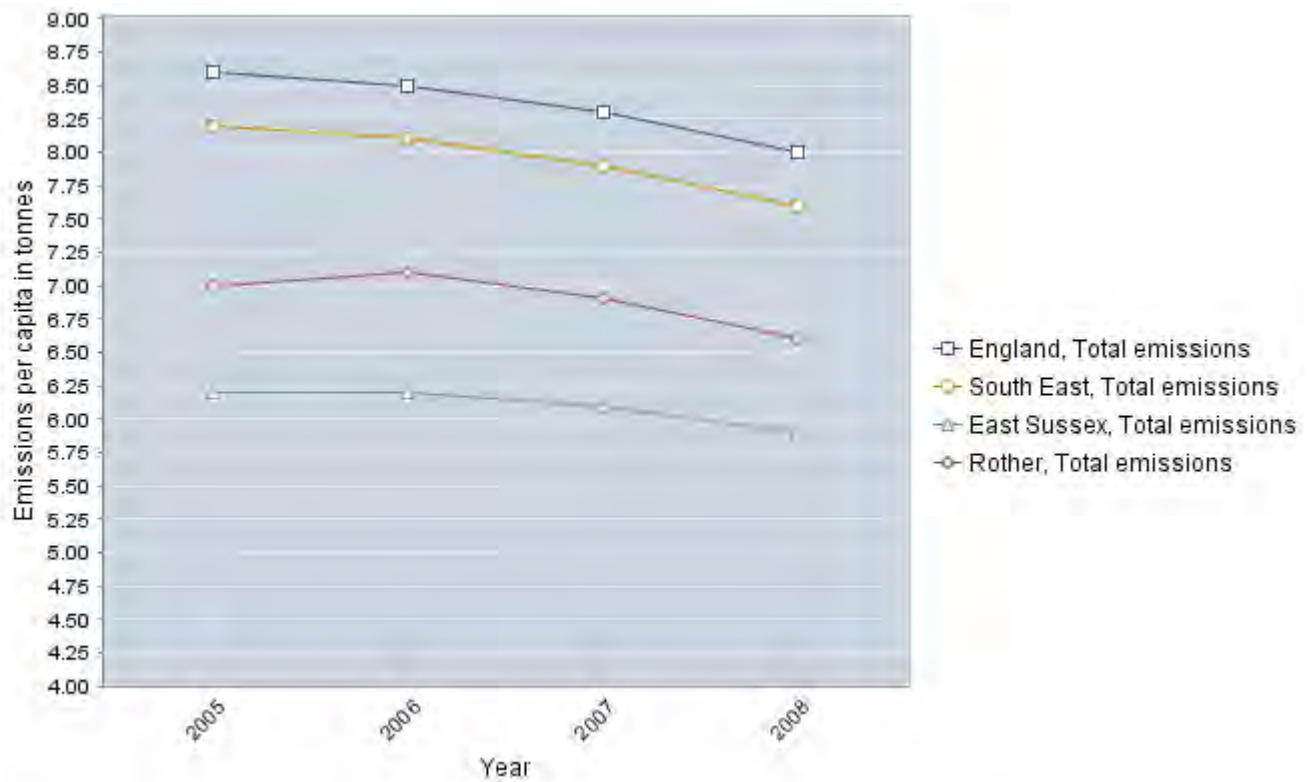
## **SA Objective 11. Reduce emissions of Greenhouse Gases**

### Carbon Dioxide emissions, 2005-2008 (Kilo tonnes)

Sectors	Total emissions			
Year	2005	2006	2007	2008
Geography				
England	431,896	430,166	422,483	413,963
South East	66,633	66,350	65,319	63,773
East Sussex	3,157	3,146	3,090	3,019
Rother	616	622	616	588

Source: Defra

### Carbon Dioxide emissions, 2005-2008 (per capita in tonnes)



Source: Defra

### Percentage of new development with renewable energy generation

% new development with renewable energy generation	2009/10
Geography	
Rother	0

Source: RDC AMR 2010

## Applications received for renewable energy on existing development

Year	Electricity Generation		RE developments and installations	
Rother			Permission granted	Completed
2009/10	Onshore wind		Data unavailable	0
	Solar		0.0055 MW	0.00054 MW
	Hydro		0	0
	Biomass	Landfill gas	0	0
		Sewage sludge digestion	0	0
		Municipal (& industrial) solid waste combustion	0	0
		Co-firing of biomass with fossil fuels	0	0
		Animal biomass	0	0
		Plant biomass	Data unavailable	0
	Onshore wind		0	0
2008/9	Solar		1.5	0.7
	Hydro		0	0
	Biomass	Landfill gas	0	0
		Sewage sludge digestion	0	0
		Municipal (& industrial) solid waste combustion	0	0
		Co-firing of biomass with fossil fuels	0	0
		Animal biomass	0	0
		Plant biomass	0.3	0.3
2007/08	Total completions		7	6.2
2006/07	Total completions		No Data	18.4

Source: RDC AMR 2010

## SA Objective 12: Minimise the risk of flooding and resulting detriment to people and property

### Properties at risk from flooding

Awaiting data from EA

### Planning permissions granted contrary to EA advice on flood defence grounds

Year	Planning Permissions granted contrary to EA advice on flood defence grounds
Rother	
2009/10	0
2008/09	0
2007/08	0
2006/07	0

Source: Environment Agency

## **SA Objective 13: Maintain, improve and manage water resources in a sustainable way**

### Water consumption per capita

Awaiting data from EA

### River water of high and good quality in 2009 (Km of rivers and canals)

Quality level	High and good		
Status	Ecological Status	Biological Status	Physico-Chemical Status
Geography			
England	12,844.1	14,810.6	24,592.0
South East	1,214.9	1,919.5	2,360.7
East Sussex	130.4	303.9	229.9
Rother	58.0	125.3	120.8

Source: Environment Agency

### River water of high and good quality in 2009 (% of river length)

Quality level	High and good		
Status	Ecological Status	Biological Status	Physico-Chemical

			Status
Geography			
England	22.8	32.9	48.9
South East	17.1	32.4	37.5
East Sussex	19.3	50.3	35.4
Rother	23.2	58.0	49.7

Source: Environment Agency

### Bathing quality at beaches

Year	1988	1989	1990	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009
Geography																						
Bexhill	4	4	4	4	4	4	4	4	4	4	2	4	4	4	4	4	4	1	4	4	4	4
Camber	4	4	4	5	4	4	4	4	4	4	4	4	4	2	1	1	4	1	1	1	2	1
Norman's Bay	4	4	4	4	4	4	4	4	4	4	1	1	4	1	2	2	2	2	1	2	1	2
Winchelsea	4	3	4	4	4	1	4	1	4	1	4	1	1	2	1	1	1	1	1	1	1	1

(1=best, 5=fail)

Source: Environment Agency

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

### Rother Sites of Special Scientific Interest in 2010 – Condition Summary

SSSI Condition Summary	% Area favourable	% Area unfavourable recovering	% Area unfavourable no change	% Area unfavourable declining	% Area destroyed / part destroyed
Geography Geography					
Ashburnham Park	15.60%	84.40%	0.00%	0.00%	0.00%
Blackhorse Quarry	100.00%	0.00%	0.00%	0.00%	0.00%
Brede Pit And Cutting	100.00%	0.00%	0.00%	0.00%	0.00%
Combe Haven	100.00%	0.00%	0.00%	0.00%	0.00%
Dallington Forest	0.00%	100.00%	0.00%	0.00%	0.00%
Darwell Wood	100.00%	0.00%	0.00%	0.00%	0.00%
Dungeness, Romney Marsh And Rye Bay	60.09%	39.12%	0.79%	0.00%	0.00%
Fore Wood	100.00%	0.00%	0.00%	0.00%	0.00%
Hastings Cliffs To Pett Beach	76.69%	23.31%	0.00%	0.00%	0.00%
Hemingfold Meadow	100.00%	0.00%	0.00%	0.00%	0.00%
High Woods	0.00%	100.00%	0.00%	0.00%	0.00%
Houghton Green Cliff	100.00%	0.00%	0.00%	0.00%	0.00%
Leasam Heronry Wood	100.00%	0.00%	0.00%	0.00%	0.00%
Maplehurst Wood	0.00%	0.00%	0.00%	100.00%	0.00%
Marline Valley Woods	100.00%	0.00%	0.00%	0.00%	0.00%
Northiam	100.00%	0.00%	0.00%	0.00%	0.00%
Pevensey Levels	0.00%	99.50%	0.00%	0.00%	0.50%
River Line	100.00%	0.00%	0.00%	0.00%	0.00%
Rye Harbour	0.00%	0.00%	100.00%	0.00%	0.00%
Willingford Meadows	36.56%	63.44%	00.00%	0.00%	0.00%
Winchelsea Cutting	0.00%	0.00%	0.00%	100.00%	0.00%

Source - SSSI Condition Natural England

## Quality of Sites of Special Scientific Interest in 2010 – Comparison with Other Areas

Conditions	Total SSSI area in hectares	Favourable - percent	Unfavourable recovering - percent	Unfavourable declining - percent	Unfavourable no change - percent	Destroyed/Part destroyed - percent
Geography						
England	1,081,776	41.0	54.8	1.3	2.8	0.0
South East	136,609	43.6	53.5	1.4	1.5	0.1
East Sussex	12,936	24.5	74.8	0.4	0.1	0.1
Rother	2,053	27.2	71.6	0.0	0.3	0.9

Source: Department of Energy & Climate Change



### Local Nature Reserves in 2006 and 2009 (in hectares)

Year	2006	2009
Geography		
England	33,293	35,403
South East	8,976	9,858
East Sussex	1,412	1,413
Rother	326	326

Source: Department of Energy & Climate Change

### Local Nature Reserves in 2006 and 2009 (area per 1,000 residents in hectares)

Year	2006	2009
Geography		
England	0.60	0.69
South East	1.10	1.18
East Sussex	2.80	2.77
Rother	3.80	3.67

Source: Department of Energy & Climate Change

### Number & area designated sites

Designated sites		Area of designation in East Sussex (ha)	% of East Sussex	Area of designation in Rother (ha)	% of Rother	Number in Rother
International	Ramsar	3585.38	2.08	486.46	0.94	2
	Special Area of Conservation (SAC)	3635.98	2.11	536.49	1.04	1
	Special Protection Area (SPA)	4324.40	2.51	1117.44	2.16	1

Source: Sussex Biodiversity Record Centre

## Area of ancient semi-natural woodland

Rother District	Area (ha)	% of the district	Number of woodland parcels	Average area of woodland parcel
All woodlands (NIWT) >2 ha	9,751	18.81	487	20.02
Original AWI (woods >2 ha)	7,595	14.65	523	14.52
Revised AWI (including woods <2 ha)	8,055	15.54	1324	6.08
Overall ancient woodland gain – compared to Original AWI (2000)	460	0.89	801	

Source: A revision of the Ancient Woodland Inventory for Rother district, East Sussex 2010

## Woodland Access

Woodland Access in East Sussex	% population With current access	% population With access If inaccessible Woods opened	% population requiring new woodland in order to meet standard	Minimum area of new planting required to enable standard
Geography				
East Sussex	76.7	87.7	12.4	80ha
Rother	87.4	97.0	2.9	40ha

Source: Adapted from The Woodland Trust (2010) Space for People: Targeting action for woodland access.

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

## Number of listed buildings

Year	2007/08	2008/09	2009/10
Geography			
Rother	2131	2133	2136

Source: GIS system EH

## Number of Conservation Areas

Conservation Areas	Number of Conservation Areas
Geography	
Battle	1
Bexhill Old Town	1
Bexhill Town Centre	1
Burwash	1
Northiam	1
Robertsbridge	1
Rye	1
Sedlescombe	1
Ticehurst	1
Winchelsea	1
Rother Total	10

## Buildings of Grade 1 and 2\* at risk

Year	2010	2010
Geography	Grade 1	Grade 2*
Rother	1	0

Source: EH buildings at risk register

## Areas of Outstanding Natural Beauty in 2007

Designations	Total area in hectares	High Weald AONB - hectares	High Weald AONB - percent
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Geography			
East Sussex	171,937	87,981	51.2
Rother	51,539	42,810	83.1

Source: GIS system ESCC

## SA Objective 16. Reduce waste generation and disposal, and achieve the sustainable management of waste

### Household waste in tonnage, 2005-2010

Years	2005/6	2006/7	2007/8	2008/9	2009/10
Geography					
East Sussex	257,496	260,385	253,403	246,779	241,744
Rother	35,105	35,483	32,250	33,459	35,015

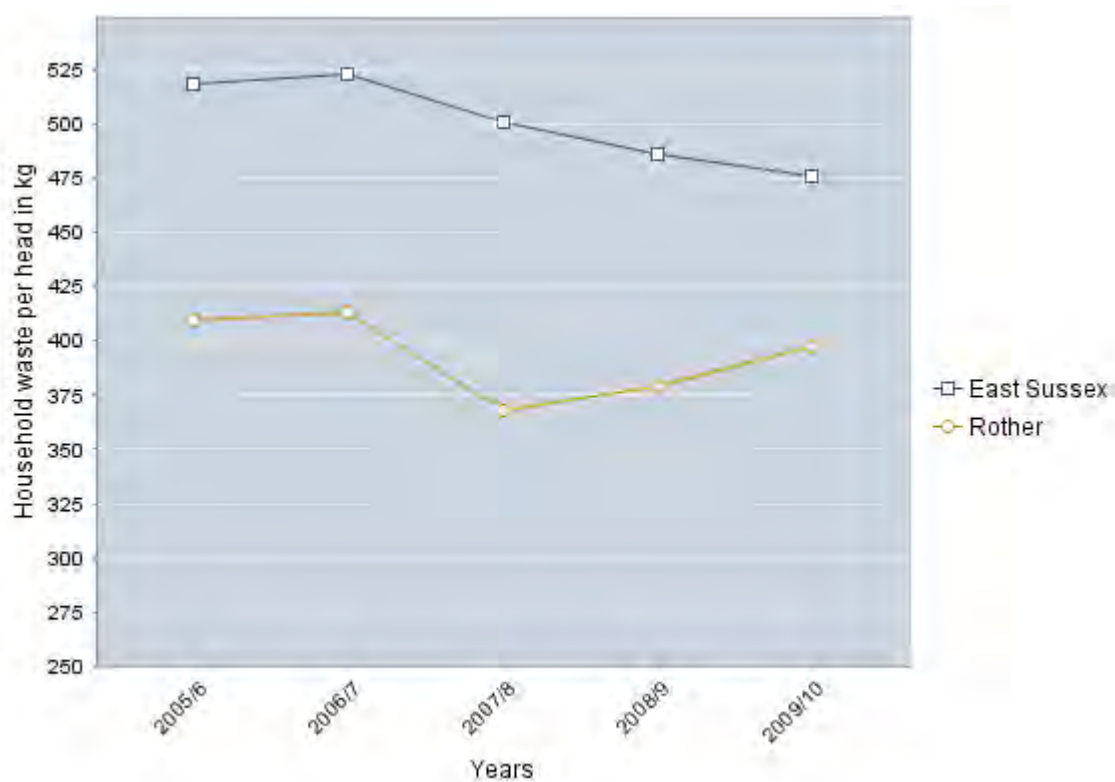
Source: Joint Waste Contract Team, ESCC

### Household waste being recycled or composted, 2005-2010 (%)

Years	2005/6	2006/7	2007/8	2008/9	2009/10
Geography					
East Sussex	26.8	28.9	32.9	35.1	36.5
Rother	15.7	16.4	29.1	37.3	43.1

Source: Joint Waste Contract Team, ESCC

### Household waste collected per head, 2005-2010 (Kg)



Source: Joint Waste Contract Team, ESCC

### Household waste going to landfill, 2005-2010 (%)

Years	2005/6	2006/7	2007/8	2008/9	2009/10
Geography					
East Sussex	73.1	71.0	56.9	44.2	36.3
Rother	84.2	83.4	51.2	30.3	22.2

Source: Joint Waste Contract Team, ESCC

## Appendix 2: Sustainability Appraisal Framework

This table updates the version that appeared in Appendix 1 of the Initial SA in November 2008.

Blue text highlights indicators that are new to this version of the SA

Red text highlights indicators that were in the original 2008 SA scoping report, but it has not been possible to update.

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

4	Reduce deprivation and social exclusion	Does the option/policy: <ul style="list-style-type: none"> <li>• Reduce poverty and social exclusion in those areas most affected</li> <li>• Reduce the number of children living in poverty</li> <li>• Reduce the number of households in fuel poverty</li> </ul>	<ul style="list-style-type: none"> <li>• % households in fuel poverty</li> <li>• % working population claiming benefits + out of work benefits</li> <li>• Indices of multiple deprivation</li> <li>• Mean household income</li> </ul>	<ul style="list-style-type: none"> <li>• RDC</li> <li>• ESiF</li> <li>• ESiF</li> <li>• ESiF</li> </ul>
5	Raise educational achievement levels and develop the opportunities for lifelong learning	Does the option/policy: <ul style="list-style-type: none"> <li>• Increase the numbers of school-leavers achieving GCSE passes</li> <li>• Increase numbers undertaking further and higher education</li> <li>• Enhance opportunities for adult education</li> </ul>	<ul style="list-style-type: none"> <li>• % pupils achieving Level 4 at Key stage 2</li> <li>• % students 16+ in full time education</li> <li>• % working age population with no qualifications</li> </ul>	<ul style="list-style-type: none"> <li>• ESiF</li> <li>• ESiF</li> <li>• ESiF</li> </ul>
6	Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	Does the option/policy: <ul style="list-style-type: none"> <li>• Stimulate economic revival in priority regeneration areas</li> <li>• Provide a diverse range of jobs that meets local needs</li> <li>• Support the rural economy</li> <li>• Ensure the correct mix of skills to meet the current and future needs of local employers</li> <li>• Encourage the development of a buoyant, sustainable tourism sector</li> <li>• Increase provision of better quality jobs / skilled employment?</li> </ul>	<ul style="list-style-type: none"> <li>• % long term unemployed</li> <li>• unemployment as % of population</li> <li>• GVA per person – only county level</li> <li>• Business start up and closures?</li> <li>• Loss of employment land to retail</li> <li>• Permissions for B class uses</li> <li>• Tourism business turnover</li> <li>• Local business units</li> <li>• Employment rate</li> <li>• Small businesses showing employment growth</li> </ul>	<ul style="list-style-type: none"> <li>• ESiF</li> <li>• ESiF</li> <li>• ESiF / RDC</li> <li>• ESiF</li> <li>• AMR</li> <li>• ESiF</li> <li>• Tourism SE Survey</li> <li>• ESiF</li> <li>• ESiF</li> <li>• ESiF</li> </ul>
SEA Directive Topics: Population, Material Assets, Air, Climate Factors				

7	Improve accessibility to services and facilities for all ages across the District	Does the option/policy: <ul style="list-style-type: none"> <li>• improve accessibility in the rural areas of the District</li> <li>• Support delivery of quality public transport</li> <li>• Enhance the PRoW and cycle network</li> <li>• Support the timely delivery of infrastructure needs associated with new development</li> <li>• Encourage the provision of services and facilities in accessible locations</li> </ul>	<ul style="list-style-type: none"> <li>• % new development within 30 minutes public transport of services and facilities</li> <li>• % completed retail, office &amp; leisure development in town centres</li> <li>• <a href="#">Working age people with access to employment centres</a></li> <li>• <a href="#">Households within 30mins access by walking/public transport</a></li> <li>• <a href="#">Internet connection in 2010</a></li> </ul>	<ul style="list-style-type: none"> <li>• AMR</li> <li>• AMR</li> <li>• ESIF</li> <li>• ESIF</li> <li>• ESIF</li> </ul>
SEA Directive topics: Human Health, Cultural Heritage				
8	Encourage and facilitate increased engagement in cultural and leisure activities	Does the option/policy: <ul style="list-style-type: none"> <li>• Improve accessibility to cultural and leisure activities</li> <li>• Increase the number of cultural enterprises / organisations in the District</li> </ul>	<ul style="list-style-type: none"> <li>• Satisfaction with sport &amp; leisure facilities</li> <li>• Satisfaction with theatres &amp; galleries</li> <li>• Visits to museums in Rother per 1000 population</li> </ul>	<ul style="list-style-type: none"> <li>• APP</li> <li>• APP</li> <li>• APP</li> </ul>
SEA Directive topics: Material Assets, Air, Climatic Factors, Biodiversity, Soil				
9	Improve efficiency in land use and encourage the prudent use of natural resources	Does the option policy: <ul style="list-style-type: none"> <li>• Use land that has been previously developed in preference to Greenfield</li> <li>• Re-use buildings and materials</li> <li>• Protect and enhance the best and most versatile agricultural land</li> </ul>	<ul style="list-style-type: none"> <li>• % development on previously developed land</li> <li>• vacant private sector dwellings returned to occupancy</li> <li>• <a href="#">Previously developed land</a></li> <li>• <a href="#">Consumption of gas and electricity</a></li> <li>• <a href="#">Total energy consumption</a></li> </ul>	<ul style="list-style-type: none"> <li>• APP/AMR</li> <li>• APP</li> <li>• ESIF</li> <li>• ESIF</li> <li>• ESIF</li> </ul>
SEA Directive Topics: Air, Climatic Factors, Material Assets, Human Health				



10	Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	Does the option/policy: <ul style="list-style-type: none"> <li>• Improve air quality</li> <li>• Improve travel choice</li> <li>• Reduce the need for travel by car / lorry</li> <li>• Reduce the need to travel for commuting</li> </ul>	<ul style="list-style-type: none"> <li>• Background levels of air pollutants</li> <li>• Number of AQMAs</li> <li>• Commuting patterns in/out District</li> <li>• Mode of travel to work</li> <li>• % PRow signposted &amp; easy to use</li> <li>• Distance travelled to work</li> </ul>	<ul style="list-style-type: none"> <li>• ESiF/RDC</li> <li>• DfT website</li> <li>• ESiF</li> <li>• ESiF</li> <li>• ES Council Plan</li> <li>• ESiF</li> </ul>
SEA Directive Topics: Climatic Factors, Material Assets				
11	Reduce emissions of greenhouse gases	Does the option/policy: <ul style="list-style-type: none"> <li>• Reduce emissions through reduced travel, energy consumption</li> <li>• Promote renewable energy generation</li> <li>• Promote community involvement, understanding &amp; action on climate change</li> </ul>	<ul style="list-style-type: none"> <li>• Emissions of greenhouse gases</li> <li>• % new development with renewable energy generation</li> <li>• Applications received for renewable energy on existing development</li> </ul>	<ul style="list-style-type: none"> <li>• ESiF</li> <li>• RDC</li> <li>• RDC</li> </ul>
SEA Directive Topics: Climatic Factors, Material Assets, Water, Human Health				
12	Minimise the risk of flooding and resulting detriment to people and property	Does the option/policy: <ul style="list-style-type: none"> <li>• Reduce the proportion of properties at risk of flooding in the District</li> <li>• Promote adoption and use of SuDS</li> </ul>	<ul style="list-style-type: none"> <li>• Properties at risk from flooding – awaiting data from EA</li> <li>• Planning permissions granted contrary to EA advice on flood defence grounds</li> </ul>	<ul style="list-style-type: none"> <li>• SFRA / EA</li> <li>• AMR</li> </ul>
SEA Directive Topics: Water, Human Health, Material Assets				
13	Maintain, improve and manage water resources in a sustainable way	Does the option/policy: <ul style="list-style-type: none"> <li>• Protect &amp; improve water quality</li> <li>• Require the use of water efficiency measures</li> <li>• Minimise the risk of pollution to water sources</li> </ul>	<ul style="list-style-type: none"> <li>• Water consumption per capita – awaiting data from EA</li> <li>• Quality of river water chemical and biological water quality</li> <li>• Bathing quality at beaches</li> </ul>	<ul style="list-style-type: none"> <li>• ESiF</li> <li>• ESiF</li> <li>• ESiF</li> </ul>

SEA Directive topics: Biodiversity, Flora, Fauna				
14	Conserve and enhance biodiversity	Does the option/policy: <ul style="list-style-type: none"> <li>• Protect and enhance designated and locally valued habitats and species</li> <li>• Prevent and reverse habitat fragmentation</li> <li>• Provide opportunities for provision &amp; enhancement of green space</li> </ul>	<ul style="list-style-type: none"> <li>• Number &amp; area designated sites</li> <li>• Condition of designated sites including SSSI in favourable or unfavourable recovering</li> <li>• Area of ancient semi-natural woodland</li> <li>• <a href="#">Access to woodland</a> <ul style="list-style-type: none"> <li>• Number of LNRs</li> <li>• Percentage of LNRs per 1,000 population</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• AMR/ESiF</li> <li>• AMR</li> <li>• Natural England</li> <li>• <a href="#">Woodland Trust</a></li> <li>• ESiF</li> <li>• ESiF</li> </ul>
SEA Directive Topics: Landscape, Cultural Heritage, Soils				
15	Protect and enhance the high quality natural and built environment	Does the option/policy: <ul style="list-style-type: none"> <li>• Ensure protection and enhancement of the AONB</li> <li>• Protect or enhance sites &amp; features of historical, archaeological, or cultural interest (including conservation areas, listed buildings, registered parks and gardens and scheduled monuments)</li> <li>• Minimise adverse impact on landscape setting of towns and rural settlements</li> </ul>	<ul style="list-style-type: none"> <li>• Number of Conservation Areas</li> <li>• Buildings of Grade I and II* at risk</li> <li>• Number of listed buildings</li> <li>• <a href="#">AONB (Ha)</a></li> </ul>	<ul style="list-style-type: none"> <li>• RDC</li> <li>• EH Register</li> <li>• RDC/EH</li> <li>• ESiF</li> </ul>
SEA Directive Topics: Material Assets				
16	Reduce waste generation and disposal, and achieve the sustainable management of waste	Does the option/policy: <ul style="list-style-type: none"> <li>• Help reduce waste and facilitate recycling in construction and operation</li> <li>• Encourage composting</li> <li>• Encourage development self-sufficient in waste management</li> <li>• Support recovery of energy from waste</li> </ul>	<ul style="list-style-type: none"> <li>• % of recycled household waste</li> <li>• Waste collected per person (kg) and % change in household waste collected per year</li> <li>• % household waste composted</li> <li>• % household waste landfilled</li> <li>• <a href="#">Household waste in tonnage</a></li> </ul>	<ul style="list-style-type: none"> <li>• APP</li> <li>• APP</li> <li>• APP</li> <li>• APP</li> <li>• ESiF</li> </ul>

## Appendix 3: DPD Objectives Appraisal

This table updates the version that appeared in Appendix 2 of the Initial SA in November 2008. The following strategic objectives have been updated since the 'Consultation on Strategy Directions'

Wording at 'Consultation on Strategy Directions' Stage	Wording at Proposed Submission Stage
<b>SO1: Overall Spatial Strategy</b>	
<b>SO1 To achieve a pattern of activity and development that responds positively to the South East Plan and the area's particular local circumstances and environmental resources in contributing to the Community Strategy and the Spatial Vision</b> 1.1 To meet the development requirements and otherwise accord with the development strategy of the South East Plan 1.2 To guide sustainable development and help build more sustainable communities, with a better balance between homes and jobs 1.3 To maintain the character of settlements, the relationship between them and with their landscape settings 1.4 To give particular attention to promoting economic regeneration and growth for the Hastings/Bexhill area 1.5 To give particular attention to supporting the 'market towns' roles of Battle and Rye 1.6 To meet local needs and support vibrant, mixed communities in the rural areas whilst giving particular attention to the ecological, agricultural, public enjoyment and intrinsic value of the countryside	<b>SO1 To achieve a pattern of activity and development that contributes to the Sustainable Community Strategy and the 'Spatial Vision', and responds to local circumstances/environmental resources.</b> (i) To guide sustainable development and help build more sustainable communities, with a balance between homes and jobs; (ii) To maintain and enhance the character of settlements, the relationship between them and with their landscape settings; (iii) To give particular attention to promoting economic regeneration and growth for the Hastings/Bexhill area; (iv) To give particular attention to supporting the 'market town' roles and environmental qualities and settings of Battle and Rye; (v) To promote vital, mixed communities in the rural areas, whilst also giving particular attention to the distinctive characteristics of the High Weald AONB and the intrinsic value of the wider countryside
<b>SO2: Bexhill</b>	
<b>SO2 To strengthen the identity of Bexhill and for it to become one of the most attractive places to live on the south coast, attractive to families, the young and elderly alike, within an integrated approach to securing a more</b>	<b>SO2 To strengthen the identity of Bexhill and for it to become one of the most attractive places to live on the south coast, attractive to families, the young and elderly alike, within an integrated approach to securing a more</b>

<p><b>prosperous future for the Bexhill and Hastings area</b></p> <p>2.1 To foster a more balanced demographic profile, while at the same time providing for the needs of older people</p> <p>2.2 To improve the quality of the built environment</p> <p>2.3 To increase the range of local job opportunities</p> <p>2.4 To secure investment in improved community infrastructure</p> <p>2.5 To ensure that development strengthens the identity of the town and its character</p>	<p><b>prosperous future for the Bexhill and Hastings area.</b></p> <ul style="list-style-type: none"> <li>(i) To increase the number and range of local job opportunities, within an integrated approach across the Bexhill and Hastings area;</li> <li>(ii) To make the town more attractive to younger people and families and thereby foster a more balanced demographic profile;</li> <li>(iii) To improve the quality and character of the built environment, promote its heritage and a clean, safe image for the town;</li> <li>(iv) To secure investment in improved community infrastructure, particularly that which promotes active lifestyles;</li> <li>(v) To strengthen the retail, commercial as well as cultural role of the town centre as the heart of the town;</li> <li>(vi) To focus on meeting socio-economic needs within more deprived areas of the town;</li> <li>(vii) To promote a scale and nature of housing consistent with other objectives, especially economic growth, and infrastructure capacity.</li> </ul>
<p align="center"><b>Shared Vision for Bexhill and Hastings Fringes</b></p>	
<p><b>To secure a more prosperous future for the Hastings and Bexhill.</b></p> <p>Economic regeneration and growth will be generated through joined up working concentrating on:</p> <ul style="list-style-type: none"> <li>(a) the regeneration and growth will be generated through joined up working concentrating development;</li> <li>(b) social regeneration;</li> <li>(c) strategic physical and environmental projects and programmes.</li> </ul> <p>Shared objectives:</p> <ul style="list-style-type: none"> <li>1. To develop an integrated learning and employment strategy, in conjunction with other key agencies, that secures both increased skills and business investment across the area;</li> <li>2. To support the Bexhill/Hastings Link Road and the Baldslow link as being essential for the economic and social regeneration of the two towns and to improve road and rail connections to the rest of the South</li> </ul>	<p>N/a – This has been incorporated into other strategic objectives and policies (specifically as part of the context for the Overall Spatial Strategies) and no longer has a direct equivalent.</p>

<p>East;</p> <p>3. To develop and support a 'local transport strategy' for Hastings and Bexhill that brings forward more sustainable travel patterns and critical investment in all modes of transport infrastructure;</p> <p>4. To ensure that there is a range of housing supply across Hastings and Bexhill to support sustainable growth, including for economically active people and families;</p> <p>5. To secure investment in, and otherwise assist, areas of socio-economic need, with particular regard to social inclusion, getting people back into work and dealing with the problems created by the 'informal economy';</p> <p>6. To promote the development of Pebsham Countryside Park and other crossboundary environmental schemes, including green space and urban fringe management;</p> <p>7. To recognise the important contribution of culture, sports arts, tourism and leisure to the economies of Hastings and Bexhill and to the health and well-being of people living there.</p>	
<b>SO3: Hastings Fringes</b>	
<p>N/a – There was no strategic objective specifically and only for Hastings Fringes at this stage. The closest equivalent was the Shared Vision for Bexhill <i>and Hastings Fringes</i>, as discussed in the preceding row.</p>	<p><b>SO3 To provide attractive and accessible fringes of Hastings, consistent with environmental designations.</b></p> <ul style="list-style-type: none"> <li>(i) To contribute to the setting of Hastings and, where appropriate Bexhill;</li> <li>(ii) To provide accessible green space in line with identified needs and opportunities;</li> <li>(iii) To ensure that any development in Rother district is well integrated with Hastings, and contributes to its regeneration wherever possible, and complements respective strategies for Hastings and Bexhill.</li> </ul>
<b>SO4: Rye and Rye Harbour</b>	
<p><b>SO4 To improve the economic and social well-being of Rye, including in relation to its market town role, tourism and the Port of Rye, whilst fully respecting and</b></p>	<p><b>SO4 To improve the economic and social well-being of Rye and Rye Harbour, including in relation to its market town role, tourism and the Port of Rye, whilst fully respecting</b></p>

<p><b>sensitively managing its historic character, vulnerability to flooding and ecologically important setting.</b></p> <ul style="list-style-type: none"> <li>(i) To provide high quality education, employment and housing;</li> <li>(ii) To enhance sustainable tourism and leisure;</li> <li>(iii) To improve the availability of day to day goods and services;</li> <li>(iv) To secure investment in community facilities and in new and/or improved pedestrian and cycle routes linking residents to their facilities;</li> <li>(v) To conserve and enhance the unique built character and quality of the Citadel and its distinctive landscape setting;</li> <li>(vi) To protect and sensitively manage the high quality ecological and landscape resources;</li> <li>(vii) To continue to manage, and protect the community from, the risk of flooding;</li> <li>(viii) To enhance the character and amenities (including visitor amenities) of Rye Harbour.</li> </ul>	<p><b>and sensitively managing its historic character, vulnerability to flooding and ecologically important setting.</b></p> <ul style="list-style-type: none"> <li>(i) To work with stakeholders to improve traffic management, tackle congestion and promote sustainable transport measures</li> <li>(ii) To work with agencies to support and promote strategic transport links from Rye to the wider locality</li> <li>(iii) To improve access to high quality education, employment and housing;</li> <li>(iv) To enhance sustainable tourism and leisure;</li> <li>(v) To improve the availability of day to day goods and services;</li> <li>(vi) To secure investment in community facilities and in new and/or improved pedestrian and cycle routes linking residents to their facilities;</li> <li>(vii) To conserve and enhance the unique built character and quality of the Citadel and its distinctive landscape setting;</li> <li>(viii) To protect and sensitively manage the high quality ecological and landscape resources;</li> <li>(ix) To continue to manage, and protect the community from, the risk of flooding;</li> </ul>
<b>SO5: Battle</b>	
<p><b>To support the market town and tourist centre role and character of Battle, and conserve its historic core and setting.</b></p> <ul style="list-style-type: none"> <li>(i) to enhance the commercial and tourism attractiveness of the town centre;</li> <li>(ii) to conserve the key characteristics of the town and its setting that contribute to the AONB;</li> <li>(iii) to congestion and improve accessibility, especially by non-car modes;</li> <li>(iv) to maintain the town's physical identity;</li> <li>(v) to provide increased opportunities for employment locally;</li> <li>(vi) to improve the level of community and sports/recreation facilities.</li> </ul>	<p><b>To support the market town and tourist centre role and character of Battle, and conserve its historic core and setting.</b></p> <ul style="list-style-type: none"> <li>(i) to reduce congestion and improve accessibility, especially by non-car modes;</li> <li>(ii) to enhance the commercial and tourism attractiveness of the town centre;</li> <li>(iii) to conserve the key characteristics of the town and its setting that contribute to the AONB;</li> <li>(iv) to provide increased opportunities for employment locally;</li> <li>(v) to improve the level of community and sports/recreation facilities.</li> <li>(vi) to preserve and enhance the historic character of the Abbey</li> </ul>

	(vii) and Battlefield and maintain the town's physical identity. to make an appropriate contribution towards meeting local housing needs
<b>SO6: Rural Areas</b>	
<p><b>To meet local needs and promote vital, viable and support vibrant, mixed communities in the rural areas, whilst giving particular attention to the economic, ecological, public enjoyment and intrinsic value of the countryside.</b></p> <p>(i) To recognise the individual distinctiveness of villages and retain and enhance their rich cultural heritage;</p> <p>(ii) To ensure viable and accessible rural services within villages.</p> <p>(iii) To maintain and improve the social cohesion of villages and to be more inclusive, especially in terms of access to housing;</p> <p>(iv) To ensure that new development helps meet local needs, enhances or supports local services and community facilities and is in harmony with its setting;</p> <p>(v) To support agriculture and foster other land-based industries;</p> <p>(vi) To promote environmentally sensitive land management and to respect and conserve the historic landscape mosaic, particularly in the High Weald AONB;</p> <p>(vii) To retain, support and better manage the diversity of natural habitats, including ancient woodland;</p> <p>(viii) To support sustainable tourism and recreation, including improved access to the countryside;</p> <p>(ix) To support local employment opportunities;</p>	<p><b>To meet local needs and support vibrant and viable mixed communities in the rural areas, whilst giving particular attention to the social, economic, ecological and intrinsic value of the countryside.</b></p> <p>(i) To emphasise the significant contribution of both villages and countryside to the character and culture of Rother;</p> <p>(ii) To recognise the individual distinctiveness of villages and to retain and enhance their rich cultural heritage;</p> <p>(iii) To support sustainable local employment opportunities and the economic viability of rural communities;</p> <p>(iv) To promote thriving rural communities with a high quality of life, a strong sense of place and broad active civic participation;</p> <p>(v) To be demographically balanced and socially inclusive, particularly in terms of access to housing;</p> <p>(vi) To reduce both the need to travel and reliance on the private car, by promoting the use of public transport and supporting viable and accessible services and facilities within villages;</p> <p>(vii) To ensure rural communities have access to vital social, physical and green infrastructure, and realise ICT potential;</p> <p>(viii) to protect the open countryside and retain its intrinsic rural character for the benefit of residents and visitors</p> <p>(ix) To respect and conserve the historic landscape mosaic, particularly in the High Weald AONB;</p> <p>(x) To support agriculture and foster other land-based industries;</p> <p>(xi) To promote environmentally sensitive land management in a way that supports the diversity of natural habitats;</p> <p>(xii) To support sustainable tourism and recreation, including improved access to the countryside.</p>



(x) To promote use of public transport to larger and neighbouring settlements.	
<b>CO1 Sustainable Resource Management</b>	
N/a – This was not a chapter in its own right at ‘Strategy Directions’ stage, but rather a sub-chapter of the ‘Environment’ chapter.	<b>To mitigate and adapt to climate change impacts, and to use natural resources efficiently</b> <ul style="list-style-type: none"> <li>(i) To reduce carbon emissions and move towards a low carbon future</li> <li>(ii) To maintain an adequate, safe water supply, use water resources efficiently, and avoid their pollution.</li> </ul>
<b>CO2 Communities</b>	
<b>To continue to support, and further develop, vibrant, safe, balanced and inclusive communities</b> <ul style="list-style-type: none"> <li>i) To provide housing in a way that supports local priorities and provides choice, including for affordable housing</li> <li>ii) To develop inclusive community life including support networks</li> <li>iii) To promote healthy, active lifestyles</li> <li>iv) To support older people, particularly to live independently</li> <li>v) To be more attractive to young people as a place to live</li> <li>vi) To maintain low crime levels and improve the feeling of safety across the District</li> </ul>	<b>To continue to support and further develop vibrant, safe, balanced and inclusive communities.</b> <ul style="list-style-type: none"> <li>(i) To develop inclusive community life including support networks</li> <li>(ii) To promote healthy, active lifestyles</li> <li>(iii) To support older people, particularly to live independently</li> <li>(iv) To be more attractive to young people as a place to live</li> <li>(v) To maintain low crime levels and improve the feeling of safety</li> </ul>
<b>CO3 Local Housing Needs</b>	
N/a – Housing was not a chapter in its own right at ‘Strategy Directions’ stage, but rather a sub-section of the ‘Communities’ chapter.	<b>To provide housing in a way that supports local priorities and provides choice, including affordable housing</b> <ul style="list-style-type: none"> <li>(i) To provide and maintain a housing stock that supports sustainable, inclusive, communities in both towns and rural areas</li> <li>(ii) To respond to the changing mix and needs of households, including more older person households</li> </ul>



	<ul style="list-style-type: none"> <li>(iii) To increase the availability of affordable housing</li> <li>(iv) To provide housing choices that encourage young people to live locally</li> <li>(v) To make effective use of existing housing stock, including bringing empty homes back into use</li> </ul>
<b>CO4 Economy</b>	
<b>To secure sustainable economic growth for existing and future residents and provide greater prosperity for all</b> <ul style="list-style-type: none"> <li>i) To raise aspirations and improve educational attainment</li> <li>ii) To increase skill levels</li> <li>iii) To increase the business base and overall productivity</li> <li>iv) To expand the range of job opportunities</li> <li>v) To improve the balance of homes and jobs</li> <li>vi) To increase local earnings relative to living costs</li> </ul>	<b><u>To secure</u> securing sustainable economic growth for existing and future residents and provide greater prosperity and job opportunities for all'</b> <ul style="list-style-type: none"> <li>(i) To raise aspirations and improve educational attainment, where needed</li> <li>(ii) To increase skill levels</li> <li>(iii) To expand the business base and overall productivity, to include fostering high growth sectors</li> <li>(iv) To increase the supply and range of job opportunities across the district, as part achieving a more sustainable pattern of development and activity</li> <li>(v) To increase local earnings, relative to living costs</li> <li>(vi) To develop key existing sectors, including tourism</li> <li>(vii) To realise economic opportunities and mitigate against locational disadvantages</li> </ul>
<b>CO5 Environment</b>	
<b>To maintain the high quality and improve the long term stewardship of the natural and built environment, with full regard to potential future consequences of climate change</b> <ul style="list-style-type: none"> <li>i) To place greater emphasis on design quality in all development</li> <li>ii) To conserve, where appropriate enhance, and manage the high quality ecological and landscape resources including the historic built</li> </ul>	<b>To maintain the high quality, and improve the long term stewardship, of the natural and built environment, with full regard to potential future consequences of climate change</b> <ul style="list-style-type: none"> <li>(i) To conserve, manage and, where appropriate enhance, the high quality landscape resources, including the High Weald Area of Outstanding Natural Beauty and the historic built environment</li> </ul>

<p>environment</p> <p>iii) To protect communities from flooding and effectively manage risk</p> <p>iv) To minimise carbon emissions, including through greater use of renewable energies</p> <p>v) To improve air quality</p> <p>vi) To encourage and support efficient use of resources, including land, water and energy</p> <p>vii) To maintain areas of remoteness</p>	<p>(ii) To protect important ecological resources in the district, and, where appropriate, enhance these as part of a wider approach to 'green space'</p> <p>(iii) To place strong emphasis on design quality in all development</p> <p>(iv) To protect communities from flooding and effectively manage risk</p>
<b>CO6 Transport and Accessibility</b>	
<p><b>To provide a higher level of access to jobs and services for all ages in both urban and rural areas, and improve connectivity with the rest of the region</b></p> <p>i) To increase the potential for travel by more sustainable modes</p> <p>ii) To provide effective access to health, recreation and social services for all</p> <p>iii) To ensure that transport infrastructure and services are 'fit for purpose', both in terms of its capacity to serve both existing and new development and to support economic objectives.</p>	<p><b>To provide a higher level of access to jobs and services for all ages in both urban and rural areas, and improve connectivity with the rest of the region.</b></p> <p>i. improve connectivity between Rother and the wider South East region, both along the coast and towards London</p> <p>ii. achieve a re-balancing of the transport system in favour of sustainable modes as a means of access to employment, health services, recreation and community facilities</p> <p>iii. maximise transport choice and otherwise provide for efficient and safe movement, in both urban and rural areas</p>

## Matrix for comparing Plan Objectives against SA Objectives

SA Objectives	SO1 Overall Spatial Strategy	SO2 Bexhill	SO3 Hastings Fringes	SO4 Rye and Rye Harbour	SO5 Battle	SO6 Rural Areas	CO1 Sustainable Resource Management	CO2 Communities	CO3 Local Housing Needs	CO4 Economy	CO5 Environment	CO6 Transport & Accessibility
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 the 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. <a href="#">Encourage and facilitate increased engagement in cultural and leisure activities</a>	✓	✓	✓	✓	✓	✓	✓	✓	~	~	~	✓
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 by protecting both designated and non-designated but locally important species and habitats	~	✓	✓	~	~	✓	✓	✓	~	~	✓	~
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	✓	✓	✓	✓	✓	✓	✓	✓	~	~	✓	✓
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	~	~	~	~	~	✓	~	~	~	~	~

## Commentary

Note: A commentary on the objectives as they appeared at 'Consultation on Strategy Directions' was included in the Initial SA report in November 2008 (in Appendix 2). As the updated objectives are substantially very similar in most cases, the reader is also referred to this earlier version for explanation of the rationale behind the objectives, their evolution and their relationship with SA objectives. The following commentaries in this latest version of the SA are primarily concerned with an explanation for any changes.

- SO1** In light of the fact that the Proposed Submission Core Strategy is now proposing an overall level of housing development that is less than the South East Plan it was highlighted that amendment of the previous wording is appropriate. It is explained elsewhere in the Proposed Submission Core Strategy why the overall housing numbers now differ from the South East Plan requirements. Only other minor change is that sub-option iv adds weight to the 'environmental qualities and settings' of the market towns, in accordance with SA objectives 9 and 15.
- SO2** Main Objective remains identical. Sub-objectives gone up in number from five to seven. Various amendments have also been made to the sub-objectives. References have been added to the 'integrated approach across the Bexhill and Hastings area' as well as the need 'To make the town more attractive to younger people and families' (to clarify the existing reference to balanced demographic profile). A reference to 'promoting active lifestyles' has been added in relation to securing investment in improved community infrastructure (in acknowledgement of SA objective 2 'Improve health and well-being'). Three new sub-objectives have been added;
- v. To strengthen the retail, commercial as well as cultural role of the town centre as the heart of the town;
  - vi. To focus on meeting socio-economic needs within more deprived areas of the town;
  - vii. To promote a scale and nature of housing consistent with other objectives, especially economic growth, and infrastructure capacity.
- Sub-objective (vii) will support the achievement of SA objectives 7 and 8 in particular and 10 and 11 to some extent. Of the existing sub-objectives, (ix) is particularly helpful to SA objective 4, while (x) helps to achieve SA objective 1.
- SO3** New Core Strategy objective that has been informed by SA objectives 2, 4, 7, 8, 14 and 15.
- SO4** Essentially the same objective with reference to Rye Harbour added. Sub-objectives reviewed in light of Rye Town study.

- SO5** Main objective unchanged. Sub-objectives reviewed in light of Battle Town Study
- SO6** Main objective simplified whilst retaining same intent. Sub-objectives rationalized. Reference to social, physical and green infrastructure added, as well as ICT potential. Reference to protecting open countryside and intrinsic rural character added in accordance with SA Objective 15.
- CO1** New objective that gives re-newed prominence to key sustainability themes and supports SA objectives 9, 11, 13 and 16.
- CO2** Main objective unchanged. Sub-objective changes largely as a result of 'Housing' now having its own objective and thus no longer referred to.
- CO3** New objective primarily supporting SA objective 1, but also indirectly linked to SA objectives 3 and 4.
- CO4** Essentially the same. Sub-objectives now refer to tourism as a key sector and need to mitigate against locational disadvantage.
- CO5** Essentially the same, although new objective CO1 on sustainable resource management has necessitated some rationalization. Reference to AONB also added in accordance with new wording of SA Objective 15 (as requested by Natural England)
- CO6** Main objective unchanged. Sub objectives re-worded – now greater favour given to sustainable modes in accordance with SA objectives 10 and 11.

## Appendix 74: List of relevant policies, plans, strategies and programmes

This Appendix updates Appendix 1 of the June 2008 SA Scoping Report.

Those highlighted in yellow are additional documents identified since the production of the Scoping Report.

Those crossed through were considered at the time of the 2008 Scoping Report but are no longer considered relevant.

Title	Date
<b>International</b>	
Kyoto Protocol on Climate Change	1997
The Johannesburg Declaration on Sustainable Development	2002
<b>European Union</b>	
European Spatial Development Perspective	1999
European Strategy on Sustainable Development	2001
EU Sixth Environmental Action Plan 2002-2012	2002
European Communities Directive on the Conservation of Wild Birds (79/09/EEC)	1979
EC Council Directive on the Conservation of Habitats and of Wild Fauna and Flora 92/43/EEC	1992
The Landfill Directive (1999/31/EC)	1999
The Air Quality Directive Framework Directive (1996/62/EC)	1996
Water Framework Directive (2000/60/EC)	2000
<b>National</b>	
HM Treasury 'National Infrastructure Plan'	2010
CLG 'Decentralisation & Localism Bill'	2010
HM Treasury and Dept of Business, Innovation & Skills Policy Statement 'Planning for Growth'	2011
Department of Health 'White Paper - Healthy Lives, Healthy People'	2010
DEFRA Marine Policy Statement, being developed as part of our new marine planning system	Publication due Spring 2011
<a href="#">The Conservation of Habitats and Species Regulations 2010</a> Chapter 8 covers Land Use Plans.	April 2010
Draft Waste Regulations 2011 (England and Wales)	Laid before parliament on 8 Feb 2011
Draft NPS Waste Water (DEFRA, Nov 2010)	
National Waste Strategy	Anticipated in Spring 2011 but maybe delayed
Draft NPS – Overarching National Policy Statement for Energy (DEC, 2009)	Revised versions (Dec, 2010)

Draft NPS – Renewable Energy generation, including wind farms, energy from waste and biomass plant fossil (DEC, 2009)	Final version due to be published <b>spring 2011</b>
Draft NPS – Fuel Electricity Generating Infrastructure e.g. gas, oil and coal fired power stations (DEC, 2009)	
Draft NPS – Electricity networks infrastructure e.g. power lines and sub stations (DEC, 2009)	
Draft NPS – Nuclear power generation (DEC, 2009)	
Draft NPS – Ports (DEC, 2009)	
Dept of Business, Innovation & Skills 'Local growth white paper'	2010
CLG, DEFRA, DTI, DfT White Paper 'Planning for a Sustainable Future'	2007
Planning and Compulsory Purchase Acts 2004 and 2008	2004 & 2008
DEFRA Sustainable Development Strategy 'Foundations of our Future'	
PAS 'Plan Making Manual Guidance on Sustainability Appraisal of LDFs'	
Towards a Sustainable Transport System: Supporting economic Growth in a Low Carbon Economy	2007
ODPM Circular 06/98: Planning and Affordable Housing	1998
DEFRA 'Future Water: The Government's Water Strategy for England	2008
ODPM 'The Planning response to Climate Change: advice on better practice'	2004
DEFRA 'Climate Change Act'	2008
Code for Sustainable Homes: Setting the Sustainability Standards for New Homes (and accompanying Technical Guide)	
The Air Quality (England) Regulations 2000 and 2002 Amendment	2000 & 2002
DEFRA 'Air Quality Strategy for England, Scotland, Wales and NI'	2007
DEFRA 'UK Air Quality Strategy'	
DEFRA 'Strategy for Sustainable Farming and Food	2004
DfT 'Towards a Sustainable Transport System'	2007
DfT 'Delivering a Sustainable Transport System'	2008
Wildlife and Countryside Act 1981 (as amended)	1981
The Natural Environment and Rural Communities Act	2006
Biodiversity: UK Action Plan	
The Government's Strategy for Combined Heat and Power to 2010	
DTI 'Energy White Paper, Meeting the Energy Challenge'	2007
DTI Energy Review 'The Energy Challenge'	2006
Securing the Future – The UK Sustainable Development Strategy	2005
UK Climate Change Programme	2006
UK Air Quality Strategy (DEFRA)	2000
The Historic Environment: A Force for our Future	2001
Countryside and Rights of Way Act (CROW)	2000
Working with the Grain of Nature – A Biodiversity Strategy for England	2002
Waste Strategy for England	2007
Making space for water Taking forward a new Government strategy for flood and coastal erosion risk management in England	2005
State of the Environment Report	2006
PPS 1 Creating Sustainable Communities	2005
Draft PPS 1 Supplement – Planning for a Low Carbon Future in a Changing Climate	2007
Supplement to PPS1 'Planning and Climate Change'	2007
PPS 3 Housing	2011
PPS 3 Housing (2006 Version)	

PPG 4 Industrial Commercial Development and Small Firms	1992
PPS4 Planning for Sustainable Economic Growth	2009
PPS 6 Planning for Town Centre	2005
PPS 7 Sustainable Development in Rural Areas	2004
PPG 8 Telecommunications	2001
PPS 9 Biodiversity and Geological Conservation	2005
PPS 10 Planning for Sustainable Waste Management	2005
PPS 12 Local Development Frameworks	2004
PPG 13 Transport	2001
Updated PPG13 (DfT, January 2011)	Changes only to paragraphs 49-56
PPG 15 Planning and the Historic Environment	1994
PPG 16 Planning and Archaeology	1990
PPG 17 Planning for Open Space, Sport and Recreation	2002
PPG 20 Coastal Planning	1992
PPG 21 Tourism	1992
PPS 22 Renewable Energy	2004
PPS 23 Planning and Pollution Control	2004
PPG 24 Planning and Noise	1994
PPS 25 Development and Flood Risk	2006
PPS Consultation Paper on a new PPS: Planning for a Natural and Healthy Environment	2010
<b>Regional</b>	
Regional Planning Guidance for the South East (RPG9)	2001
Regional Transport Strategy	2004
Strategy for Energy Efficiency and Renewable Energy	2004
Tourism and Related Sport and Recreation	2004
Strategy for energy efficiency and renewable energy	2004
Sustainable Communities in the South East	2003
South East Regional Housing Strategy 2006-2009	2006
Regional Economic Strategy 2002-2012	2002
Action for Biodiversity in the South East	
Seeing the Woods for the Trees – Regional Forestry Framework	2004
South East Region Social Inclusion Statement (SEERA)	2002
Draft Regional Spatial Strategy – The South East Plan	2005
SEERA et al 'The South East Regional Sustainability Framework – Towards a Better Quality of Life'	2008
A Better Quality of Life in the South East	
South East Biodiversity Strategy	2009
Tourism South East 'Tourism ExSELLence: the Strategy for Tourism in the South East	2004
<b>Sub regional / County</b>	
Sussex Learning & Skills Council Annual Plan 2006 – 2007	2006
Pride of Place – a community strategy for East Sussex	2003
East Sussex & B/H Structure Plan 1991 – 2011	1999
East Sussex and B & Hove Waste Local Plan	2006
East Sussex and B & Hove Minerals Local Plan	1999
East Sussex Local Transport Plan (LTP2)	2006
Sussex Biodiversity Action Plan	1998



Hastings and Bexhill Area Investment Framework Annual Performance Plan 2007-2008	2007
South Foreland to Beachy Head Shoreline Management Plan	2006
Environment Agency Catchment Flood Management Plan: Rother and Romney (in progress)	2007
Rother Catchment Abstraction Management Strategy	2006
ESCC 'Draft Strategic Open Space Study'	2011
East Sussex Environment Strategy Group Draft East Sussex Environment Strategy	Nov 2010 Final version to be agreed by ESSP
ESCC 'Climate Change Strategy'	Sept 2009
LTP3 (ESCC)	2011
The High Weald AONB Management Plan 2004 2 <sup>nd</sup> edition	(High Weald AONB Joint Advisory Committee
Environment Agency 'River Basin Management Plan South East River Basin District	2009
South East Coastal Group 'Beachy Head to Selsey Bill Shoreline Management Plan First Review Final Report'	2006
Southern Water 'Water Resource Management Plans 2010-2035'	
High Weald AONB Management Plan	2004
<b>Local / District</b>	
Rother District Local Plan	2006
<a href="#">Rother District Council 'North East Bexhill Masterplan' SPD</a>	<a href="#">2009</a>
Rother Community Plan	2004
Rother Corporate Plan	2006
Rother Economic Regeneration Strategy 2004 – 2009	2004
Rother Crime and Disorder Reduction Strategy 2005-2008	2005
Rother Cultural and Leisure Strategy	2006
Rother District Council Housing Strategy 2007-2012	2007
Rother Environmental Policy Statement	current
Rye Conservation Area Appraisal	2006
Battle Conservation Area Appraisal	2006
Bexhill Town Centre Conservation Area Appraisal	2004
Sedlescombe Conservation Area Appraisal	2004
Robertsbridge Conservation Area Appraisal	
<b>Neighbouring Authority Local Plans</b>	
Hastings Local Plan	2004
Shepway Local Plan	2006
Ashford Borough Local Plan	2000
Tunbridge Wells Borough Local Plan	2006
<del>Approved Non-Statutory Wealden District Local Plan</del>	<del>2005</del>
Wealden District Adopted Local Plan	1998
Wealden District District Core Strategy Spatial Development Options Consultation	2009
Hastings Core Strategy Preferred Options Consultation	2008

## **Appendix 4: Plan Options<sup>1</sup>**

This table updates the version that appeared in Appendix 3 of the Initial SA in November 2008.

Many of the emerging Core Strategy options were already identified and assessed in the 'Initial Sustainability Appraisal' Report published in November 2008 (in Appendices 3 and 4 of that document).

Therefore it is important to note that Appendices 3 and 4 of this Sustainability Appraisal of the Pre-Submission Core Strategy only include options where either;

1. They have changed substantially, or;
2. New options have been developed or emerged

### **Appendix 4a Spatial Options**

#### **Option (A) District Wide Spatial Distribution**

Option A1 — Re-distribute development deficit as a result of link road delay or cancellation, elsewhere within the district.

Option A2 — 'Ring fence' development in Bexhill and Hasting Fringes so that unavoidable changes such as link road delay / cancellation do not impact on required development levels elsewhere in the District.

#### **Option (B) District Wide Scale of Growth**

Option B1 — Continue South East Plan requirements of 280 per annum for 2006-2026 or 5,600 over the 20-year plan period (or equivalent rate of development to 2028)

Option B2 — A Lower rate of development than that directed by the South East Plan, in recognition of changed circumstances.

#### **Option (C) Bexhill — Strategic Direction of Growth**

Option C1 — Focus new development to the north-east of the town.

Option C2 — Focus new development to the west of the town

Option C3 — Focus new development to the north of the town

#### **Option (D) Bexhill — Scale of Growth**

Option D1 — Level of development proposed in Consultation on Strategy Directions (3,100 — 3,300 by 2026 or equivalent to 2028)

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<sup>1</sup> Note: This content that formerly formed Appendix 4, has now been incorporated into the main document Section 5.4, as well as expanded and elaborated upon

~~Option D2—A lower level of development (2,150 between 2011 and 2028) averaging 129 per year assuming link road development from 2016.~~

~~Option D3—A continuation of ‘pre-link road’ level of development (some 75 dwellings per year) throughout the plan period. In effect assuming the link road will not be constructed.~~

### **~~Option (E) Hastings Fringes Issues – Continue with Scale of Development Identified in ‘Consultation on Strategy Directions’~~**

~~Option E1—Continue with proposed development at Breadsell as set out in the Core Strategy ‘Consultation on Strategy Directions’~~

### **~~Option (F) Battle—Strategic Direction of Growth~~**

~~Option F1—Focus new allocations to the south-east of the town.~~

~~Option F2—Focus new allocations both within the development boundary and via modest peripheral expansion opportunities (following further work as part of the Site Allocations DPD), with no particular focus on any side of the town.~~

### **~~Option (G) Rye—Scale of Growth~~**

~~Option G1—Housing Development levels as proposed in the ‘Consultation on Strategy Directions’~~

~~Option G2—Reduced housing requirement in the light of further evidence (Rye Town Study and Strategic Housing Land Availability Study)~~

## Appendix 5: Sustainability Appraisal of Plan Options

This table updates the version that appeared in Appendix 4 of the Initial SA in November 2008.

### Sustainability appraisal scoring criteria

Symbol	Likely effect against the SA Objective
✓	Potentially significant beneficial effect
(✓)	Option supports this objective though it may only have a minor effect
~	3. Policy has no effect 4. effect is neutral insofar as the benefits and drawbacks appear equal and neither is considered significant
?	Uncertain or insufficient information on which to determine the assessment at this stage
(X)	Option appears to conflict with the objective and may result in minor adverse effects
X	Potentially significant adverse effect

Each option will be assessed in order to identify:

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

The final point, referring to magnitude, serves as an initial proxy for identifying the relative significance of the impacts of the Option. This activity also provides an initial opportunity to identify potential cumulative and synergistic impacts and to consider appropriate mitigation measures. Whether an effect is considered likely to be significant will depend on whether it has a material impact on an SA Objective. The effects may be judged according to:

- Probability, duration, frequency and reversibility of the effects
- Cumulative nature of the effects
- Trans-boundary nature of the effects
- Risks to human health or the environment
- Magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)
- Value and vulnerability of the area likely to be affected due to: special natural characteristics or cultural heritage; exceeded environmental quality standards or limit values; intensive land-use; or effects on areas having a recognised national, Community or international protection status
- How they contribute to achieving, or restrict the achievement of, the various elements of the SA Objectives

## Option (A) District-Wide Spatial Distribution

Option A1 – Re-distribute development deficit as a result of link road delay or cancellation, elsewhere within the district.				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	~	( ✓ )	( ✓ )	Option A1 would result in more dwellings being constructed than option A2. The effects would not be felt in the short term as the link road and related development is not proposed in the short term.
2. Improve the health and well-being of the population and reduce inequalities in health	~	~	~	There is a link between good quality affordable housing and health and well-being. However this has to be balanced against the fact that re-distribution away from the Bexhill and Hastings fringes areas and into the more rural hinterland would mean new residents were less accessible to key medical services including the Conquest Hospital.
3. Reduce crime and the fear of crime	~	( ✓ )	( ✓ )	Some links in that reducing deprivation and social exclusion can also be a contributory factor in reducing crime.
4. Reduce deprivation and social exclusion	~	( ✓ )	( ✓ )	Easier access to the housing market may help reduce deprivation and social exclusion.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	( x )	( x )	Option A1 would locate dwellings in areas less accessible to colleges and university, thus reducing the proportion of the population with good access to opportunities for lifelong learning.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	~	~	Benefits to the construction industry have to be balanced by the fact that development would inevitably be re-directed to the AONB where opportunities for high value, lower impact activities would be limited.
7. Improve accessibility to services and facilities for all ages across the District	~	( x )	( x )	Option would direct development into locations less accessible to key services.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	( x )	( x )	Option A1 would direct development into locations less accessible to cultural and leisure activities..
9. Improve efficiency in land use and encourage the prudent use of natural resources	~	x	x	Option may result in other areas being obliged to take an unsustainable level of development, in excess of their needs and in excess of their ability to integrate successfully into local communities. This would be contrary to both Core Strategy and SA Objectives.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	x	x	Option A1 would re-direct development throughout the District into areas with less travel choice and less accessible to key services. It is likely to result in more reliance on the private car.
11. Reduce emissions of greenhouse gases	~	x	x	Opportunities to achieve renewable and/or CHP opportunities at Bexhill (Option A2) would be lost and arguably harder to achieve via piecemeal development elsewhere in the District (Option A1).
12. Minimise the risk of flooding and resulting detriment to people and property	~	( x )	( x )	Without knowing the more specific locations that development would be re-directed to, this is hard to assess. It is likely though that there would be increased pressure for development in areas at risk of flooding from option A1, such as Rye and some villages with flood issues (e.g. Robertsbridge).
13. Maintain, improve and manage water resources in a sustainable way	~	?	?	Relationship unclear. A2 may allow economies of scale in provision of infrastructure but equally may intensify strain on geographic area of catchment.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	~	( x )	( x )	Arguable that Option A1 may re-direct development into areas of higher sensitivity and reduce potential for mitigation and habitat creation at the macro scale.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	~	x	x	Highly likely that Option A1 would re-direct development into areas of higher landscape sensitivity in the AONB.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	( x )	( x )	Option A2 would site development closer to areas of sustainable management.
<b>Conformity with other policy/initiatives:</b> Would aim to achieve housing target set in South East Plan, although doubtful whether there is sufficient potential elsewhere outside the sub-regional area to achieve this without conflict with SA Objectives and other SE Plan objectives, as well as PPS7, PPS9, etc.				
<b>Non-conformity:</b> Possible conflict with AONB objectives. Arguably conflicts with principles of emerging Localism Bill in that it does not encourage housing numbers to be derived via local needs rather than top-down regional requirement. Likely non-conformity with other SE Plan objectives, as well as PPS7, PPS9, etc.				

Option A2 - 'Ring fence' development in Bexhill so that unavoidable changes such as link road delay / cancellation do not impact on required development levels elsewhere in the District.				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	~	(x)	(x)	Option A1 would result in more dwellings being constructed than option A2. The effects would not be felt in the short term as the link road and related development is not proposed in the short term. The benefits may not be as great as immediately apparent as it seems likely that housing development in Bexhill location (particularly NE and N Bexhill) would be more likely to meet the needs of local people and less likely to be occupied up as second homes.
2. Improve the health and well-being of the population and reduce inequalities in health	~	~	~	There is a link between good quality affordable housing and health and well-being. However this has to be balanced against the fact that re-distribution away from the Bexhill and Hastings fringes areas and into the more rural hinterland would mean new residents were less accessible to key medical services including as the Conquest Hospital.
3. Reduce crime and the fear of crime	~	(x)	(x)	Some links in that reducing deprivation and social exclusion can also be a contributory factor in reducing crime.
4. Reduce deprivation and social exclusion	~	(x)	(x)	Easier access to the housing market may help reduce deprivation and social exclusion.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	(✓)	(✓)	Option A1 would locate dwellings in areas less accessible to colleges and university, thus reducing the proportion of the population with good access to opportunities for lifelong learning.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	~	~	Benefits to the construction industry have to be balanced by the fact that development would inevitably be re-directed to the AONB where opportunities for high value, lower impact activities would be limited.
7. Improve accessibility to services and facilities for all ages across the District	~	(✓)	(✓)	The proportion of the population with access to services and facilities is better maintained by concentrating development in higher order service centres. Re-distributing development into lower order settlements in the less accessible rural hinterland would have the opposite effect, particularly for the young and the old.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	(✓)	(✓)	Option A1 would direct development into locations less accessible to cultural and leisure activities..
9. Improve efficiency in land use and encourage the prudent use of natural resources	~	✓	✓	Option would prevent other areas being obliged to take an unsustainable level of development, in excess of their needs and in excess of their ability to integrate successfully into local communities. This would be contrary to both Core Strategy and SA Objectives.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	✓	✓	Option A1 would re-direct development throughout the District into areas with less travel choice and less accessible to key services. It is likely to result in more reliance on the private car.
11. Reduce emissions of greenhouse gases	~	✓	✓	Opportunities to achieve renewable and/or CHP opportunities at Bexhill (Option A2) would be lost and arguably harder to achieve via piecemeal development elsewhere in the District (Option A1).
12. Minimise the risk of flooding and resulting detriment to people and property	~	(✓)	(✓)	Without knowing the more specific locations that development would be re-directed to, this is hard to assess. It is likely though that there would be increased pressure for development in areas at risk of flooding from option A1, such as Rye and some villages with flood issues (e.g. Robertsbridge).
13. Maintain, improve and manage water resources in a sustainable way	~	?	?	Relationship unclear. A2 may allow economies of scale in provision of infrastructure but equally may intensify strain on geographic area of catchment.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	~	(✓)	(✓)	Arguable that Option A1 may re-direct development into areas of higher sensitivity and reduce potential for mitigation and habitat creation at the macro scale.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	~	✓	✓	Highly likely that Option A1 would re-direct development into areas of higher landscape sensitivity in the AONB, therefore option A2 is preferable in this regard.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	(✓)	(✓)	Option A2 would site development closer to areas of sustainable management.
<b>Conformity with other policy/initiatives:</b> Arguably greater conformity with emerging Localism Bill in that it allows housing numbers to be derived via local needs rather than top-down regional requirement. Likely to be less conflict with AONB objectives.				
<b>Non-conformity:</b> South East Plan housing target, although arguably conforms more with other SE Plan objectives.				

## Option A: Commentary and Summary

Option A1 would result in higher levels of growth than option A2, as a consequence of re-distributing the development, particularly that which would have been built alongside the link road at North-East Bexhill. Therefore Option A1 emphasises housing and employment growth and effectively provides the South East Plan housing requirements (as set out in the Initial SA 'scale of growth option 1', i.e. 280 dwellings per annum).

In Option A1, development would be redistributed potentially elsewhere in the District, namely rural areas, Battle, Rye, Hastings Fringes or other areas of Bexhill. However, it is reasonable to assume that development pressure would be in line with recent market trends and therefore most acute in rural areas (as demonstrated in the trend-based distribution option within the Core Strategy 'Consultation on Strategy Directions' – paragraph 5.36). Therefore it is considered that the weakness of Option A1 is that it may lead to unsustainable levels of growth in areas such as the High Weald AONB, contrary to SE Plan policies concerned with environment, landscape and heritage. Another likely consequence of Option A1 is that the SE Plan and Core Strategy policies prioritising a shared vision based on regeneration with Hastings would be compromised via the effective promotion of development in locations not as well related to Hastings as north-east Bexhill.

Option A2 emphasises the co-ordination of supporting infrastructure. It would undeniably result in a lower level of development across the District over the course of the plan period. However it would allow a much greater degree of conformity with the SE Plan and local objectives for a shared economic vision with Hastings by prioritising development that complements this vision, as well as restricting the scale of development in the High weald AONB to what has previously been recognised as consistent with its objectives.

There is a distinction within both Options A1 and A2 between the effects of link road delay, and the effects link road cancellation, which is drawn out in more detail in the D options. The key fact is that the effects of delay would be more short-term, meaning the scale and rate of delivery could no longer be achieved in the early part of the plan period. Both Link Road delay and cancellation are both eventualities covered by Core Strategy policy OSS2. Cancellation would have significant consequences for the overall vision and strategy and on the area's capacity for economic growth - which is a priority.

Although option A1 performs reasonably against the social and economic objectives and should deliver increased affordable housing, overall option A1 performs poorly on sustainability criteria compared to A2. Thus A2 is the chosen option within the



Proposed Submission Core Strategy.

## Option (B) District-Wide Scale of Growth

Option B1 – Continue South East Plan requirements of 280 per annum for 2006-2026 or 5,600 over the 20-year plan period (or equivalent rate of development to 2028)				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	~	✓	✓	Option B1 would result in more dwellings being constructed than option B2. The effect would be felt more in the mid and latter stages of the plan period.
2. Improve the health and well-being of the population and reduce inequalities in health	~	( ✓ )	( ✓ )	There is a link between good quality affordable housing and health and well-being.
3. Reduce crime and the fear of crime	~	( ✓ )	( ✓ )	Facilitating access to housing of all sectors of society, including disadvantaged groups, may help reduce crime.
4. Reduce deprivation and social exclusion		( ✓ )	( ✓ )	Easier access to the housing market may help reduce deprivation and social exclusion.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	Not directly relevant to this policy.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	~	~	Marginal benefits to construction industry from option B1. Other affects are harder to quantify. Growth may support development of business sites, but the economy is unlikely to grow fast enough to provide sufficient jobs, which would lead to unemployment, out-commuting and more retirement housing, contrary to strategy.
7. Improve accessibility to services and facilities for all ages across the District	~	~	~	It is not the rate or quantum of development that affects this objective, but the location of development.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	~	~	It is not the rate or quantum of development that affects this objective, but the location of development.
9. Improve efficiency in land use and encourage the prudent use of natural resources	~	✗	✗	Option B2 would result in less land take and 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	~	✗	✗	Greater scale of development of B1 would inevitably have some impact on congestion.
11. Reduce emissions of greenhouse gases	~	✗	✗	Greater scale of development of B1 would inevitably result in higher omissions, <a href="#">in comparison to option B2.</a>
12. Minimise the risk of flooding and resulting detriment to people and property	~	(x)	(x)	Without knowing the more specific locations that development would be re-directed to, this is hard to assess. It is likely though that there would be increased pressure for development in areas at risk of flooding from option B1, <a href="#">in comparison to option B2.</a>
13. Maintain, improve and manage water resources in a sustainable way	~	(x)	(x)	Higher rate of development of option B1 would require more water resources.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	~	(x)	(x)	Higher rate of development of option B1 may inevitably have a negative impact, although development can also opportunities for habitat creation and restoration, so fairly marginal.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	~	✗	✗	Highly likely that Option B1 would direct development into areas of higher landscape sensitivity, such as within the AONB.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	(x)	(x)	Higher levels of development <a href="#">at the local level</a> will result in higher levels of waste generation, although sustainability of method of disposal is also key.
<b>Conformity with other policy/initiatives:</b> Would conform with housing target set in South East Plan.				
<b>Non-conformity:</b> Possible conflict with AONB objectives and PPS7 and PPS9.. Arguably conflicts with principles of emerging Localism Bill in that it allows housing numbers to be derived via local needs rather than top-down regional requirement.				

Option B2 – A Lower rate of development than that directed by the South East Plan, in recognition of changed circumstances.				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	~	✗	✗	Option B1 would result in more dwellings being constructed than option B2. The effect would be felt more in the mid and latter stages of the plan period.
2. Improve the health and well-being of the population and reduce inequalities in health	~	(✗)	(✗)	There there is a link between good quality affordable housing and health and well-being.
3. Reduce crime and the fear of crime	~	(✗)	(✗)	Some links in that reducing deprivation and social exclusion can also be a contributory factor in reducing crime.
4. Reduce deprivation and social exclusion	~	(✗)	(✗)	Easier access to the housing market may help reduce deprivation and social exclusion.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	Not directly relevant to this policy.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	~	~	Marginal benefits to construction industry from option B1. Other affects are harder to quantify.
7. Improve accessibility to services and facilities for all ages across the District	~	~	~	It is not the rate or quantum of development that affects this objective, but the location of development.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	~	~	It is not the rate or quantum of development that affects this objective, but the location of development.
9. Improve efficiency in land use and encourage the prudent use of natural resources	~	✓	✓	Option B2 would result in less land take and 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	~	✓	✓	Greater scale of development of B1 would inevitably have some impact on congestion.
11. Reduce emissions of greenhouse gases	~	✓	✓	Greater scale of development of B1 would inevitably result in higher omissions.
12. Minimise the risk of flooding and resulting detriment to people and property	~	(✓)	(✓)	Without knowing the more specific locations that development would be re-directed to, this is hard to assess. It is likely though that there would be increased pressure for development in areas at risk of flooding from option B1.
13. Maintain, improve and manage water resources in a sustainable way	~	(✓)	(✓)	Higher rate of development of option B1 would require more water resources.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	~	(✓)	(✓)	Higher rate of development of option B1 may inevitably have a negative impact, although development can also opportunities for habitat creation and restoration, so fairly marginal.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	~	(✓)	(✓)	Highly likely that Option B1 would direct development into areas of higher landscape sensitivity, such as within the AONB.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	(✓)	(✓)	Lower levels of development <u>at the local level</u> will result in lower levels of waste generation, although sustainability of method of disposal is also key.
<b>Conformity with other policy/initiatives:</b> Arguably greater conformity with emerging Localism Bill in that it allows housing numbers to be derived via local needs rather than top-down regional requirement. Greater conformity with AONB objectives				
<b>Non-conformity:</b> South East Plan housing target.				

## **Option B: Commentary and Summary**

Option B1 in effect assumes a continuation of the levels and timing of development described in the previous round of the Core Strategy - the ' Consultation on Strategy Directions'. The level of housing growth is to continue South East Plan requirements of 280 per annum for 2006-2026 or 5,600 over the 20-year plan period (or equivalent rate of development to 2028). In terms of employment development, the Employment Strategy and Land Review concluded that 100,000sq.m of business floorspace over the plan period would be an appropriate target to improve the balance between homes and jobs and meet economic objectives, with the majority following on from construction of the link road. Approximately 50,000 sq.m would be contained within the major urban extension of north-east Bexhill and thus linked to a very large extent to link road construction.

The changed circumstances described in option B2 relate primarily to the delay and cancellation of the Hastings to Bexhill Link Road (circumstances that would require amendments as set out in emerging CS Policy OSS2); but also the poor state of the economy and a lowered expectation of development levels at Rye in the light of further evidence. Several different factors need to be balanced to determine the most appropriate scale of residential development. The 'drivers' for growth, which includes demographic projections and housing market pressures, must be balanced against supply constraints, notably environmental designations and infrastructure availability. Critical in balancing these is the vision that local communities have for their area.

The South East Plan assumed that the Bexhill to Hastings Link Road would be built by now, yet the earliest it can now be built is the very end of 2014. Furthermore, the recession and on-going weak national economic growth forecasts, mean that the prospect of actually increasing on past build rates, as implied by the South East Plan target of 280 dwellings/year) (compared to actual house-building between 1991 and 2011 of only 245 dwellings per year), seems overly optimistic and unlikely to be matched by requisite job growth. The cancellation of other transport infrastructure improvements that would have given a boost to economic regeneration at Bexhill and Hastings, notably capacity increases in the Hastings to Ashford railway line and A21 improvements, also impacts on the potential for sustainable growth. Critical environmental factors that limit the scope for development in Rother include the High Weald AONB, significant areas of flood risk and international and national nature conservation sites.

Local community needs and aspirations for more affordable housing and jobs, as well as for improved services and facilities, have also been reviewed and taken into consideration in supporting evidence.

In Option B2, the appropriate overall target for net additional housing in the district over the period from April 2011 to March 28 (17 years) most likely equates to some 3,700 - 4,100 dwellings, or an average of 218 - 241 dwellings/year. The overall employment target of 100,000sq.m is probably still appropriate in option B2, since the majority of new employment floorspace was to follow on following construction of the link road, and still can do so (despite an assumed delay), particularly as the plan period has been extended to 2028. A cancellation of the link road would have much more serious negative impacts upon housing and economic criteria, and is an eventuality that would require an amended overall development strategy (as set out in emerging CS Policy OSS2).

Option B1 performs better on housing and economic criteria, but poorly on more overall sustainability criteria compared to B2. This suggests that Option B1 with its South East Plan requirement for 5,600 dwellings to be built in Rother 2006 – 2026 (with over 70% in the coastal parts, mainly Bexhill) is less sustainable; and that option B2 should be the chosen option within the Proposed Submission Core Strategy.

## Option (C) Bexhill – Strategic Direction of Growth

Option C1 – Focus new development to the north-east of the town.				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	~	✓	✓	Will result in new housing in line with code for sustainable homes and RDC affordable housing policies.
2. Improve the health and well-being of the population and reduce inequalities in health	~	✓	✓	Good proximity and accessibility to both Hastings and Bexhill hospitals. <a href="#">Adjacent to strategic scale provision of green infrastructure.</a>
3. Reduce crime and the fear of crime	~	(✓)	(✓)	Some links in that reducing deprivation and social exclusion can also be a contributory factor in reducing crime.
4. Reduce deprivation and social exclusion	~	✓	✓	Favourably located to address deprivation and social exclusion issues in key geographic areas of Sidley, Hastings and St Leonards.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	(✓)	(✓)	Favourably located to maximise opportunities in terms of relative proximity to Colleges and Hastings University. Local plan allocation also includes a new primary school and nursery school.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	✓	✓	Mixed use proposal including major employment land release. <a href="#">Area is of a scale to make a strategic contribution to economic regeneration and growth. Well positioned geographically to capitalise on Hastings role as a regional hub and upon the Hastings labour market.</a>
7. Improve accessibility to services and facilities for all ages across the District	~	(✓)	(✓)	Reasonably close to Sidley District centre and relatively accessible to Bexhill town centre and Hastings. Local Plan allocation includes a new neighbourhood centre.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	(✓)	(✓)	Relatively accessible to Bexhill town centre and Hastings. Local Plan allocation includes a new amenity/recreation area. <a href="#">Adjacent to proposed Countryside Park which will address shortfalls of GI and open space highlighted in background evidence.</a>
9. Improve efficiency in land use and encourage the prudent use of natural resources	~	~	~	Will result in land use. However proposal is also linked to provision of CHP and/or renewable energy (wind and solar based) and the landscape is particularly well suited to the latter.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	~	~	Link road will relieve congestion on A259 Bexhill road which is at capacity and consequently have a positive impact upon the Air Quality Management Area (AQMA). May result in overall increase in traffic movements however. <a href="#">Located just over 2km walking distance from Bexhill Train station (to larger part of site (Local Plan policy BX2) and about 2km from planned station at Glyne Gap, both distances too far to be considered walkable by most people.</a>
11. Reduce emissions of greenhouse gases	~	(x)	(x)	Greater potential to exploit renewables (wind power, passive solar gain), but only if wrapped up with link road. <a href="#">RDC Low Carbon &amp; Renewable Potential Study recommended the site as suitable for a large scale wind turbine, and further noted some potential for biomass CHP. Regarding passive solar gain, the site has the advantage of naturally orientating on a east/west axis. Confirmed presence of employment areas offers advantages of both potential plant locations and the likelihood of a more 24 hour spread of usage.</a>
12. Minimise the risk of flooding and resulting detriment to people and property	~	(✓)	(✓)	Does not overlap with flood zone. Although SFRA notes some small areas of surface water flooding, as well as some incidences of sewerage water flooding on various approach roads in built up area of Bexhill.
13. Maintain, improve and manage water resources in a sustainable way	~	~	~	Pevensey Levels Appropriate Assessment (September 2010) notes that the main focus of planned growth is by urban extensions principally to the north-east of the town, which are outside the hydrological catchment area of the Pevensey Levels.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	~	~	~	Does not overlap with designated protected habitats, whilst BAP habitat wet woodland is incorporated within layout. Layout includes new green links and supports creation of countryside park.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	~	(x)	(x)	Some landscape impact, although also supports the creation of the <a href="#">Combe Valley Countryside Park</a> and associated green infrastructure benefits.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	~	~	Increased waste production balanced by closer proximity to waste disposal opportunities. <a href="#">Located in close proximity to waste management facilities at Pebsham.</a>
<b>Conformity with other policy/initiatives:</b> South East Plan policy SCT3 specifically mentions need for mixed-use development sites at North East Bexhill. This is in context of regeneration of Sussex Coast sub-region economy. Policy SCT7 focuses economic and social regeneration on the 'Hastings - Bexhill area - to develop and extend the work already undertaken in the 'Five Point Plan' into the longer term and to capitalise as a regional hub. <a href="#">Will contribute towards housing target set in 'South East Plan.</a>				
<b>Non-conformity:</b> None.				

Option C2 – Focus new development to the west of the town				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	~	( ✓ )	( ✓ )	Will result in new housing in line with code for sustainable homes and RDC affordable housing policies. However these will be focussed in a geographic area that may not be best suited to local young people or local families in need, <u>in terms of both access to jobs, and prevailing house prices</u> . As such it may not meet the Core
2. Improve the health and well-being of the population and reduce inequalities in health	~	( ✓ )	( ✓ )	Access to housing may benefit, but further proximity to A&E of Conquest hospital. Eastbourne hospital may be more accessible however.
3. Reduce crime and the fear of crime	~	~	~	Marginal influence.
4. Reduce deprivation and social exclusion	~	~	~	Its relative distance from those areas particularly suffering deprivation and social exclusion (Hastings, St Leonards and Sidley) also does not compare as well to Option C1. This location seems likely to appeal to occupiers from an older demographic based on current patterns.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	( x )	( x )	Poorly located to maximise opportunities in terms of relative proximity to Colleges and Hastings University
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	( x )	( x )	Reduced opportunity to achieve economic regeneration of Hastings - Bexhill area in line with the objectives of the Core Strategy, South East Plan, WARR partnership, Hastings & Bexhill Task Force. Potential to mitigate this to some extent if employment development were significant.
7. Improve accessibility to services and facilities for all ages across the District	~	~	~	Good proximity to Little Common district centre, although less accessible to higher level facilities and services. <u>Bus routes on A259 include routes 97 and 99.</u>
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	( x )	( x )	Cultural and Leisure activities focussed at Bexhill Town Centre, Hastings and Ravenside, so this option is comparatively less potential to facilitate the use of these.
9. Improve efficiency in land use and encourage the prudent use of natural resources	~	( x )	( x )	Will result in land use. Sustainable resource management potentials less clear.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	( x )	( x )	Increased pressure on A259 in area that is almost at capacity, although proximity to Little Common district centre may help encourage non-car modes, particularly walking. <u>Bus routes along A259 (west of Little Common roundabout) include routes 97 and 99. The larger part of the West Bexhill site (north of A259) is located about a 2km walk from the nearest train station at Cooden, probably too far to be considered a walkable distance for most people, but still comparably advantaged against North Bexhill in this respect.</u> <u>There is a tendency for residents of west Bexhill to use Eastbourne more than Hastings for shopping trips, thus resulting in longer distances being travelled.</u>
11. Reduce emissions of greenhouse gases	~	( x )	( x )	Potential for addressing this issue unclear, but development likely to have a negative affect. <u>Low Carbon &amp; Renewable Potential Study was not overly optimistic, commenting "Given the pastoral and amenity nature of the existing landscape, it is anticipated that opposition to development would be particularly strong for emotive or 'nimby-ist' technologies such as large wind, and the same would also apply for other more 'industrial' installations (as can result from large, centralised energy centres) e.g. large flues/ functional rather than aesthetic buildings. Further constraints must also include the capacity of the A259. Technologies that require frequent fuel deliveries by large lorry would have a negative impact on traffic movements. However, as for all areas of Rother, the site will benefit from above-average levels of solar irradiation, and from a purely technical perspective, there is a reasonable wind resource in terms of annual average wind speeds. A further opportunity is that the significant number of dwellings at the site would allow the operation of technologies such as CHP and biomass boilers to become viable if a decentralised heat. However, it is also worth noting that there do not appear to be non-domestic heat demand nodes of any significance in the area that could help to generate a more balanced heat demand profile on a daily and seasonal basis". The Low Carbon &amp; Renewable Potential Study further commented that "at Code level 6, the only non-wind and non-biomass option for the West Bexhill site would appear to be a fully DH connected gas-fired CHP solution, supplemented by microgeneration such as PV, and / or medium-scale wind."</u>
12. Minimise the risk of flooding and resulting detriment to people and property	~	( x )	( x )	Areas within site boundary within flood zone (2011 EA Flood zone mapping). SFRA notes sewerage flooding incidents on Barnhorn Road and Chestnut Walk, as well as scattered incidences of surface water flooding throughout the area. <u>Mitigation through SUDS likely to be achievable, but would need to be clarified through Site Allocations DPD.</u>
13. Maintain, improve and manage water resources in a sustainable way	~	( x )	( x )	<u>Pevensey Levels Appropriate Assessment (September 2010) notes that of the three areas assessed in options E1 to E3, only this one (west Bexhill) is within the hydrological catchment area of the Pevensey Levels. It further comments that development within the hydrological catchment area of the Pevensey Levels Ramsar Site would create an increase in impermeable surface, which would ultimately result in increased surface water run-off and increased pollutant loads. In turn, this has the potential to significantly affect the hydrology, soil and flora and fauna of the Pevensey Levels, and ultimately affect the Conservation Objectives of the site. Based on their assessment of the Core Strategy (Consultation on Strategy Directions) the AA stated that if its recommendations for mitigation are followed the Rother District Council Core Strategies will not have an adverse effect on the Pevensey Levels Ramsar site. In light of the commentary of the AA and in view of the absence of any confirmed allocation or permission detailing mitigation, the possibility of minor adverse impacts has to be acknowledged. The AA recommends that for the Core Strategy, there are three measures that will manage impacts of development on the Pevensey Levels to an acceptable level:</u> <u>- A commitment to implement SuDS;</u> <u>- managing levels of development within the current consented capacity of waste water treatment works; and</u> <u>- implementing water efficiency measures.</u> <u>Further assessment work for the Site Allocations DPD will include:</u> <u>- The identification of appropriate SuDS techniques to mitigate surface water and water quality concerns</u> <u>- Analysis of the results from the Review of Consents</u> <u>- Analysis of Waste Water issues and Southern Water's research, should it be available, on a new location for a WwTW if necessary.</u>
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	~	( x )	( x )	Does not overlap with designated protected habitats or BAP habitats, although will result in greenfield development. But development is in close proximity to internationally designated sites.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	~	( x )	( x )	Some landscape impact. <u>The area has an attractive pastoral character, but without impacting on the wider landscape for the greater part.</u>
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	( x )	( x )	Increased waste production. Disposal may result in cross-town vehicle movements.
<b>Conformity with other policy/initiatives:</b> <u>Will contribute towards housing target set in South East Plan.</u>				
<b>Non-conformity:</b> AA cites <u>potential</u> habitats issues <u>as a result of location within hydrological catchment of Pevensey Levels Ramsar, although it concluded there would be no adverse effects provide recommendations for mitigation were followed.</u> Possible conflict with PPS9.				

Option C3 – Focus new development to the north of the town				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	~	✓	✓	Will result in new housing in line with code for sustainable homes and RDC affordable housing policies.
2. Improve the health and well-being of the population and reduce inequalities in health	~	( ✓ )	( ✓ )	There is a link between good quality affordable housing and health and well-being, but this area is not located as accessibly to hospitals as options C1 and C2.
3. Reduce crime and the fear of crime	~	( ✓ )	( ✓ )	Some links in that reducing deprivation and social exclusion can also be a contributory factor in reducing crime. More marginal influence compared to option C1.
4. Reduce deprivation and social exclusion	~	✓	✓	Favourably located to address deprivation and social exclusion issues in key geographic areas of Sidley, Hastings and St Leonards.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	Adequately located to maximise opportunities in terms of relative proximity to Colleges and Hastings University
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	( ✓ )	( ✓ )	Accessible to planned strategic employment sites, and will support their development.
7. Improve accessibility to services and facilities for all ages across the District	~	~	~	Reasonably close to Sidley District centre and relatively accessible to Bexhill town centre <a href="#">and the higher level centre of Hastings. A269 not at full capacity. Bus routes on A269 include routes 95 and 98.</a>
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	~	~	Cultural and Leisure activities focussed at Bexhill Town Centre, Hastings and Ravenside.
9. Improve efficiency in land use and encourage the prudent use of natural resources	~	(x)	(x)	Will result in land use. Sustainable resource management potentials less clear.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	(x)	(x)	Development here would likely result in increased car journeys <a href="#">overall, although it is in reasonable proximity to Sidley District Centre which provides a reasonable range of services, and bus routes segment site along Ninfield Road.</a>
11. Reduce emissions of greenhouse gases	~	(x)	(x)	<p>Potential for addressing this issue unclear in absence of detailed scheme, but development likely to have an overall negative affect. The Low Carbon &amp; Renewable Potential Study commented on local constraints and opportunities, saying "A number of factors can be highlighted for the North Bexhill site many of which are shared with the North East Bexhill development site -</p> <p>Natural Environment</p> <ul style="list-style-type: none"> <li>• The orientation and topography of the site appears to be generally favourable for the application of passive solar design techniques.</li> <li>• The topography of the site is likely to offer good locations for the installation of large wind turbines.</li> <li>• Whilst the existing road system is congested, the construction of the new link road could provide a convenient access route for fuel deliveries (e.g. local biomass).</li> <li>• Whilst no site-specific ground condition/ hydro-geological data are available to our knowledge, the general geology of the wider area does not lend itself to ground source heat pump systems.</li> </ul> <p>Built Environment</p> <ul style="list-style-type: none"> <li>• There is insufficient detail on the planned level of development at North Bexhill to comment on local opportunities or constraints due to the built environment.</li> </ul> <p>However, if it is assumed that dwellings would be spread across the area that has been indicated for consideration (e.g. straddling the A269 between North of the brick</p>
12. Minimise the risk of flooding and resulting detriment to people and property	~	( ✓ )	( ✓ )	Does not overlap with flood zone, although SFRA notes areas of surface water flooding within the vicinity. <a href="#">Possible issues with minor streams crossing the site require further investigation at Site Allocations DPD stage.</a>
13. Maintain, improve and manage water resources in a sustainable way	~	~	~	Pevensy Levels Appropriate Assessment (September 2010) notes that the North Bexhill area is outside the hydrological catchment area of the Pevensy Levels.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	~	~	~	Does not overlap with designated protected habitats or BAP habitats, although will result in greenfield development.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	~	(x)	(x)	Some landscape impact. <a href="#">Areas alongside the proposed 'country avenue' as far as the A259 would not have undue impact on the wider landscape.</a>
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	~	~	Increased waste production balanced by closer proximity to waste disposal opportunities <a href="#">(e.g. Pebsham), although not as accessible as NE Bexhill.</a>
<b>Conformity with other policy/initiatives:</b> Conformity with South East Plan, although to a lesser extent than option C1 due to proximity of inter-relationship with Hastings, although North Bexhill's relationship to Hastings <a href="#">will be further enhanced by the provision of the spine road associated with the link road development.</a> Although North Bexhill is not specifically mentioned in the South East Plan (unlike NE Bexhill which is specifically mentioned), SE Plan policies emphasise the importance of Bexhill's relationship with Hastings (particularly SE Plan policy SCT7, and SCT2 to a lesser extent). North Bexhill is better placed geographically than West Bexhill to lend support to such policies. Will contribute towards housing target set in South East Plan.				
<b>Non-conformity:</b> None				



## **Option C: Commentary and Summary**

As Bexhill is the main urban area in the District and is planned to accommodate a large proportion of total development, consideration is given within this appraisal of whether there are broad locations capable of accommodating a large scale of development such that they should be highlighted in the Core Strategy.

Three broad areas for outward expansion of Bexhill are identified based on evidence, including the Landscape Assessment and SHLAA. These include the existing allocated development area to the north-east of the town, as well as a broad area astride the A269 to the north of Bexhill (and to the west of the NE Bexhill area), and an area astride the A259 to the west of the town. Other options have been ruled out for strategic environmental and/or access reasons.

In developing these options, consideration has been given as to whether any of them can be regarded of strategic importance to the implementation of the development strategy and, as such, should be so identified. It was concluded that only the area to the north-east of the town could be regarded as critical to the overall strategy, as it is specifically identified in the South East Plan as being integral to the sub-regional strategy for the Sussex Coast. In addition, it is already allocated in an adopted Local Plan, and is supported by neighbouring Hastings Borough Council, not least because of its potential to accommodate substantial employment floorspace relatively close to Hastings and hence make a strategic contribution to regeneration and new jobs.

Notwithstanding this, the sustainability appraisals of all options are carried out to enable comparison between the sustainability issues for development at North and West Bexhill, but also between both these areas and North-East Bexhill. Hence, it allows the option of an alternative development approach to that set out in the South East Plan and existing Local Plan to be re-appraised.

The scales of development assumed for the purposes of the SA reflect both their strategic potential and the overall scale of development proposed across the town (see Option D below).

Option C1 assumes some 1,300 dwellings and 50,000sq.m. of business floorspace, as well as additional land for retail, primary education, community use, open space and renewable energy production. This is based on the existing adopted plans for development in this area.

Option C2 and Option C3 are assessed on a 'like-for-like' basis in terms of their development potential, reflecting their area and the possibility that either or both could warrant being identified as 'broad location' for further development. The scales of development assumed in each case is 250-600 dwellings, 5,000sq.m. of business floorspace and commensurate neighbourhood facilities. These are defined in the light of evidence (including the Landscape Assessment and the SHLAA). It is important to note that whilst some of the areas were submitted to RDC by landowners and developers, in other areas the Council has itself been proactive in identifying suitable options, particularly under the auspices of the SHLAA.

North-east Bexhill (option C1) affords considerable advantages as a location, both economic, environmental, and social. North-east Bexhill's economic advantages relate primarily to its close relationship with the Hastings, which will benefit still further from the development of the Link Road. The fact that the area's successful regeneration hinges on successful working with its larger neighbour has long been recognised. The Hastings and Bexhill Task Force was established in July 2001 to bring together a regeneration strategy for the Hastings and Bexhill area. It received government funding for its 'Five-Point Plan' which focussed on five themes - Urban Renaissance, Education, Business & Enterprise, Broadband & ICT and Transport. More recently the joint regeneration strategy for Hastings and Bexhill has been recognised in South East Plan policies, as well as being central to the vision and objectives of Rother's own emerging Core Strategy. Bexhill in its entirety sits within the Hastings TTWA and one of the principal advantages of North East Bexhill is that it has the scale and accessibility to provide a strategic employment area to serve the Hastings Labour Market and hence make a substantial contribution to regeneration.

Environmentally, it has the potential to exploit renewables (wind power, passive solar gain) when developed alongside the link road. Evidence in the form of RDC's Low Carbon & Renewable Potential Study recommended the site as suitable for a large scale wind turbine, and further noted some potential for biomass CHP. Work carried out as part of the North East Bexhill Masterplan SPD such as AEA's 'A review of potential sustainable energy measures' had similar findings and recommendations. A further environmental advantage of NE Bexhill is that it is adjacent to the proposed Combe Valley Countryside Park - 640ha of green infrastructure ideally situated to serve two of the larger urban areas in East Sussex (Hastings and Bexhill), which both have significant pockets of deprivation adjacent to the park boundary. The advantages of this project were further outlined in the RDC Green Infrastructure Study as well as the ESCC Strategic Open Space Study and ESCC Environment Study. Development at NE Bexhill will help facilitate this project which will in turn establish a strong urban edge to Bexhill and Hastings, further preventing coalescence of the two towns and providing a strategic open space in an area of proven need. NE Bexhill has a notable advantage over alternative options C2 and C3 in respect of both being located adjacent to this area, and helping to facilitate it. There are no comparable opportunities adjacent to either of options C2 or C3 that would serve such a significant population.

It is also noteworthy that in a District that is 80% AONB with much of the remainder comprising flood zone and international habitat, the NE Bexhill strategic development site is relatively constraint free in these respects. Some sections of the site sit within the Combe Haven and Marline BOA, which should afford opportunities for habitat restoration and improvement should be sought alongside any development. Whilst not containing habitats of international importance, the area of GI between Bexhill and Hastings contains several Biodiversity Action Plan Priority Habitats that will benefit from the protection and enhancement that incorporation within the park boundary will bring.

Social advantages are similar in many respects to economic advantages. NE Bexhill would benefit from close proximity to Hastings Conquest Hospital (with its A&E ward), Hastings Higher Education Establishments (including the University Centre - a notable achievement of the Task Force) and the higher order sub-regional town centre of Hastings, with its many social, community and leisure facilities (shops, cinema, theatre, etc). In terms of transport infrastructure, it is important to note that Hastings is defined as East Sussex's only 'Regional Hub' (as defined in the South East Plan). North-east Bexhill is however undeniably an urban fringe location and as a consequence, social links with Bexhill Town Centre are an arguable weakness of the location, although the distance is still less than either North or West Bexhill.

West Bexhill (Option C2) is not overly constrained environmentally, not being within the AONB or international sites. However it is within reasonable proximity of international sites and within the hydrological catchment area of the Pevensey Levels and the Appendix 5 table of this option details possible implications of this. There are four areas of TPO within the strategic site and a band of flood zone (2011 EA mapping) just under 100 metres wide stretching across the northern section of the site. Northern sections of the site sit within the Pevensey Levels Biodiversity Opportunity Area, so opportunities for habitat restoration, improvement should be sought alongside any development (further details in Rother's Green Infrastructure Study). Economically it is less advantageous, not being well located to existing employment areas (notwithstanding any employment that may be achieved on the development site itself). House prices are typically high in the neighbouring vicinity, so property here may be relatively unaffordable for local people and families in need. Socially, West Bexhill enjoys good proximity to Little Common District centre, but is relatively further afield from the higher order services (Higher education and hospitals) in Bexhill and Hastings

North Bexhill (Option C3) also has environmental advantages. In common with other Bexhill major sites, it is not within the AONB. Large sections of the site sit within the Bexhill Fringe Biodiversity Opportunity Area, so opportunities for habitat restoration, improvement should be sought alongside any development (further details in Rother's Green Infrastructure Study). The site is

relatively free of landscape issues, although as with any urban fringe greenfield development there would be some impact. Based upon EA Flood mapping at 2011, none of the site was within the flood zones, although there are minor streams within the area which may reduce the developable area. In terms of economic benefits, the area will have an improved accessibility to Hastings following completion of the Country Avenue. Therefore many of the economic and social benefits discussed in relation to North-east Bexhill (Option C1) will also apply, albeit to a lesser extent than option C1.

In conclusion, focusing development at North-East Bexhill (option C1) is the option that compares most favourably against SA objectives. It is regarded as the most appropriate location for major urban expansion of the town as it will secure vital new business land in an accessible location to the A21, A259, the urban area, the town centre, existing employment areas and areas of greatest job need. To this extent, it may be seen as strategically important. It supports sustainable development, is most acceptable in environmental terms and integrates well with proposals for green infrastructure. It is also most in line with the 6 point 'Rother and Hastings Councils' shared approach to future prosperity for the Hastings and Bexhill area, as set out in Section 7 of the Proposed Submission Core Strategy.

The West Bexhill option (C2) compares somewhat less favourably against SA objectives. It compares less favourably to North East Bexhill (C1) on most factors, but also slightly less favourably against North Bexhill (C3). North Bexhill (option C3) compares moderately to SA objectives. It slightly out-performs West Bexhill location, but is not as sustainable a location as North East Bexhill, with the latter being clearly the most sustainable option.

It is important to highlight that options will be subject to further refinement within the SA of the forthcoming Site Allocations DPD. At this point in time it is recommended that both North (Option C3) and West Bexhill (Option C2) be included within the Core Strategy as 'Broad Locations' for future development. Further exact quantum, if considered applicable would be a matter for the Site Allocations DPD.

## Option (D) Bexhill – Scale of Growth

Option D1 – Continue Scale and Rate of development proposed in Consultation on Strategy Directions (3,100 – 3,300 by 2026, or equivalent rate to 2028)				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	✓	✓	✓	Option D1 would result in more dwellings being constructed than option D2. The effect would be felt more in the mid and latter stages of the plan period.
2. Improve the health and well-being of the population and reduce inequalities in health	~	~	~	There is a link between good quality affordable housing and health and well-being, although development at North-East Bexhill is best placed in this regard. Allowing higher levels of development at other locations earlier in the plan period may weaken the developability of North-East Bexhill development.
3. Reduce crime and the fear of crime	(✓)	(✓)	(✓)	Facilitating access to housing of all sectors of society, including disadvantaged groups, may help reduce crime.
4. Reduce deprivation and social exclusion	~	~	~	Generally, easier access to the housing market may help reduce deprivation and social exclusion. However in the context of Bexhill, the uncertainty of the Link Road situation complicates matters, since development at North East Bexhill offers the best opportunities to address deprivation and social exclusion. Therefore, housing development in advance of the Link Road would be in locations that would have reduced influence on this objective and also weaken the marketability of the North East Bexhill location once it does become available after link road completion (since a greater quantum of alternative housing options would have been made available elsewhere and Bexhill has a limited rate of growth it can achieve).
5. Raise educational achievement levels and develop the opportunities for lifelong learning	(x)	(x)	(x)	Likely to result in higher levels of development in locations less accessible to key higher education facilities.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	(x)	(x)	(x)	Marginal benefits to construction industry from option B1. Generally growth will support regeneration, although limited capacity to grow economy quickly means that more houses may not complement regeneration goal, but instead reinforce retirement and deprivation characteristics of the respective towns.
7. Improve accessibility to services and facilities for all ages across the District	(x)	(x)	(x)	It is not the rate or quantum of development that affects this objective, but the location of development. Objective D1 is likely to result in a higher proportion of housing development in less accessible locations.
8. Encourage and facilitate increased engagement in cultural and leisure activities	(x)	(x)	(x)	It is not the rate or quantum of development that affects this objective, but the location of development. Objective D1 is likely to result in a higher proportion of housing development in less accessible locations.
9. Improve efficiency in land use and encourage the prudent use of natural resources	(x)	(x)	(x)	Option D2 strongly linked to holistic spatial strategy for efficient use of land and natural resources including strategic employment sites, CHP/renewables, strategic open space, neighbourhood centre. Benefits of Option D1 less apparent if development dispersed elsewhere in earlier part of plan period.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(x)	(x)	(x)	This option would have a greater scale of development and in locations where means of mitigating may be more limited.
11. Reduce emissions of greenhouse gases	x	x	x	Greater scale of development of D1 would inevitably result in higher omissions.
12. Minimise the risk of flooding and resulting detriment to people and property	~	~	~	Without knowing the more specific locations that development would be re-directed to, this is hard to assess. However there are relatively few areas at risk from flooding in and around Bexhill.
13. Maintain, improve and manage water resources in a sustainable way	(x)	(x)	(x)	Higher rate of development of option D1 would require more water resources.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	(x)	(x)	(x)	Higher rate of development of option D1 may inevitably have a negative impact, although development can also opportunities for habitat creation and restoration, so fairly marginal.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	(x)	(x)	(x)	Without knowing the more specific locations that development would be re-directed to, this is hard to assess, although a greater scale of development is likely to have a more negative impact.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	(x)	(x)	(x)	Higher levels of development will result in higher levels of waste generation, although sustainability of method of disposal is also key.
<b>Conformity with other policy/initiatives:</b> Conforms with South East Plan in terms of quantity, but arguably may result in non-conformity in terms of regeneration strategy and location of growth if development was directed towards other areas of Bexhill, instead of, or in advance of, NE Bexhill. <u>The Highways Authorities have indicated that they do not believe that large new sites can be built ahead at NE Bexhill of the Link Road. Therefore a continued rate of development would inevitably result in alternative sites in the Bexhill area, that relate less well to Hastings, being prioritised ahead of NE Bexhill. Non-conformity with SE Plan policies that promote the economic and social regeneration of the Hastings/Bexhill area (and capitalise on Hastings as a regional hub) may therefore be the inevitable consequence of this option, with housebuilding not balanced by commensurate job growth.</u>				
<b>Non-conformity:</b> <u>As above. Arguably may result in non-conformity with SE Plan in terms of regeneration strategy and location of growth if development was directed towards other areas of Bexhill instead of, or ahead of, NE Bexhill. SE Plan Policy SCT2 promotes the social and economic regeneration of areas in greatest need by continuing the support to Hastings/Bexhill. SE Plan policy SCT3 promotes the economic development potential of mixed-use sites at North East Bexhill. SE Plan policy SCT7 specifically identifies the 'Hastings - Bexhill area' as a focus for delivering economic and social regeneration, in order 'to develop and extend the work already undertaken in the 'Five Point Plan' into the longer term and to capitalise on Hastings as a regional hub'.</u>				

Option D2 – A lower rate of development than that anticipated in the Core Strategy 'Consultation on Strategy Directions', in recognition of changed circumstances. <a href="#">This will total 2,050-2,250 between 2011 and 2028 averaging 129 per year assuming development associated with link road from 2016</a>				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	~	(x)	(x)	May compare less favourably to option D2 due to reduced quantum
2. Improve the health and well-being of the population and reduce inequalities in health	~	~	~	There is a link between good quality affordable housing and health and well-being.
3. Reduce crime and the fear of crime	~	(x)	(x)	Some links in that reducing deprivation and social exclusion can also be a contributory factor in reducing crime.
4. Reduce deprivation and social exclusion	~	~	~	Generally, easier access to the housing market may help reduce deprivation and social exclusion. However in the context of Bexhill, the uncertainty of the Link Road situation complicates matters, since development at North East Bexhill offers the best opportunities to address deprivation and social exclusion. Therefore, housing development in advance of the Link Road would be in locations that would have reduced influence on this objective and also weaken the marketability of the North East Bexhill location once it does become available after link road completion (since a greater quantum of alternative housing options would have been made available elsewhere and Bexhill has a limited rate of growth it can achieve).
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	(✓)	(✓)	Likely to result in higher levels of development in locations accessible to key higher education facilities.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	~	~	Marginal benefits to construction industry . Other affects are harder to quantify.
7. Improve accessibility to services and facilities for all ages across the District	~	(✓)	(✓)	It is not the rate or quantum of development that affects this objective, but the location of development. In this respect a higher proportion of development at North East Bexhill may be beneficial.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	(✓)	(✓)	It is not the rate or quantum of development that affects this objective, but the location of development. In this respect a higher proportion of development at North East Bexhill may be beneficial.
9. Improve efficiency in land use and encourage the prudent use of natural resources	~	(✓)	(✓)	Option D2 would result in less land take and 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	~	(✓)	(✓)	Greater scale of development of D1 would inevitably have some impact on congestion.
11. Reduce emissions of greenhouse gases	~	(✓)	(✓)	Greater scale of development of D1 would inevitably result in higher emissions.
12. Minimise the risk of flooding and resulting detriment to people and property	~	~	~	Without knowing the more specific locations that development would be re-directed to, this is hard to assess. However there are relatively few areas at risk from flooding in and around Bexhill.
13. Maintain, improve and manage water resources in a sustainable way	~	(✓)	(✓)	Higher rate of development of option D1 would require more water resources.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	~	(✓)	(✓)	Higher rate of development of option D1 may inevitably have a negative impact, although development can also <a href="#">provide</a> opportunities for habitat creation and restoration, so fairly marginal.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	~	(✓)	(✓)	Without knowing the more specific locations that development would be re-directed to, this is hard to assess, although a greater scale of development is likely to have a more negative impact.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	(✓)	(✓)	Higher levels of development will result in higher levels of waste generation, although sustainability of method of disposal is also key.
<b>Conformity with other policy/initiatives:</b> Conforms with South East plan in terms of regeneration strategy and location of growth, <a href="#">but does not meet SE Plan housing quantity targets.</a>				
<b>Non-conformity:</b> As above, <a href="#">does not meet SE Plan housing quantity targets.</a>				

Option D3 - A continuation of 'pre-link road' level of development (some 75 dwellings per year) throughout the plan period. In effect assuming the link road will not be constructed				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	~	x	x	<u>May compare less favourably to option D2 due to reduced quantum</u>
2. Improve the health and well-being of the population and reduce inequalities in health	~	(x)	(x)	<u>There is a link between good quality affordable housing and health and well-being. Option D3 would fail to adequately meet housing need.</u>
3. Reduce crime and the fear of crime	~	x	x	<u>Links in that reducing deprivation and social exclusion can also be a contributory factor in reducing crime. This option would do least to address deprivation and social exclusion</u>
4. Reduce deprivation and social exclusion	~	x	x	<u>Generally, easier access to the housing market may help reduce deprivation and social exclusion. Development at North East Bexhill offers the best opportunities to address deprivation and social exclusion. Cancellation of the link road would mean the north-east Bexhill development could not be constructed.</u>
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	~	(x)	<u>Neutral or negative impact. Lack of housing delivered by this option would be likely in the long term to re-enforce inequalities in the housing market, meaning young people would effectively be forced out of the area</u>
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	x	x	<u>Since North-East Bexhill offers the largest realistic strategic site for employment in Bexhill, its loss would have a negative impact. This would be further compounded by the fact that NE Bexhill would provide a substantial employment area to serve Hastings as well.</u>
7. Improve accessibility to services and facilities for all ages across the District	~	?	?	<u>It is not the rate or quantum of development that affects this objective, but the location of development. Unclear from wording of option where development may be located, although the fact that it could not possibly be at NE Bexhill is apparent.</u>
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	?	?	<u>It is not the rate or quantum of development that affects this objective, but the location of development. Unclear from wording of option where development may be located, although the fact that it could not possibly be at NE Bexhill is apparent.</u>
9. Improve efficiency in land use and encourage the prudent use of natural resources	~	( ✓ )	( ✓ )	<u>Arguably beneficial in that it would result in less land take and development</u>
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	( ✓ )	( ✓ )	<u>Less development would inevitably mean less congestion.</u>
11. Reduce emissions of greenhouse gases	~	( ✓ )	( ✓ )	<u>Less development may result in less emissions from local sources.</u>
12. Minimise the risk of flooding and resulting detriment to people and property	~	~	~	<u>Without knowing the more specific locations that development would be re-directed to, this is hard to assess. However there are relatively few areas at risk from flooding in and around Bexhill.</u>
13. Maintain, improve and manage water resources in a sustainable way	~	( ✓ )	( ✓ )	<u>Less development would arguably be beneficial at the local level.</u>
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	~	( ✓ )	( ✓ )	<u>Less development would arguably be beneficial at the local level, although balanced to some extent by potential loss of developer contributions towards green infrastructure.</u>
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	~	( ✓ )	( ✓ )	<u>Without knowing the more specific locations that development would be re-directed to, this is hard to assess, although a greater scale of development is likely to have a more negative impact.</u>
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	✓	✓	<u>Higher levels of development will result in higher levels of waste generation, although sustainability of method of disposal is also key.</u>
<b>Conformity with other policy/initiatives:</b>				
<b>Non-conformity:</b> <u>South East Plan. Policies that emphasise the importance of meeting housing and development needs.</u>				



## Option D: Commentary and Summary

To date, the scale of development envisaged at Bexhill has been predicated upon early construction of the Bexhill to Hastings link road. Option D1 therefore reflects this previous programme as set out in the previous round of the Core Strategy - the 'Consultation on Strategy Directions'. Housing growth associated with option D1 averages 160 dwellings per year. The earlier 'Consultation on Strategy Directions' put forward 3,100 - 3,300 dwellings in the town over 20 years to 2026, but this assumed the Link Road would be open in 2012/13.

Option D2 reflects the current programme that has emerged during the course of preparing the 'Proposed Submission' Core Strategy. The lower rate of development in option D2 equates to a housing target of some 2,050 - 2,250 new dwellings between 2011 and 2028, averaging 129 per year. Option D2 assumes a delay in the link road, with opening from late 2014/early 2015 with associated development from 2016. The delay in link road construction means it will be difficult to achieve the rate of development in Bexhill in the earlier parts of the plan period (since much development was Link Road dependent in North East Bexhill). Delay in opening the link road impacts on the overall quantum of housing growth, as the Highways Authorities have indicated that they do not believe that large new sites can be built in ahead of the Link Road.

Option D3 assumes a continuation of 'pre-link road' level of development (some 75 dwellings per year) throughout the plan period. In effect assuming the link road will not be constructed. Hence this option also informs Policy OSS2 in the Core Strategy. The SA of Policy OSS2 in effect assesses the sustainability of a strategy with low development as a result of link road cancellation.

To conclude: Generally growth will support regeneration, although limited capacity to grow economy quickly means that more houses may not complement wider regeneration goals, but instead reinforce retirement and deprivation characteristics of the respective towns. There is a difficulty in achieving the rate of development of employment uses pre-development of the link road. The weakened property market during the recession also lessens the prospects for a high level of house building.

Development at North East Bexhill offers the best opportunities to address deprivation and social exclusion. Therefore, housing development in advance of the Link Road would be in locations that would have reduced influence on this objective and also weaken the marketability of the North East Bexhill location once it does become available after link road completion (since a greater quantum of alternative housing options would have been made available elsewhere and Bexhill has a limited rate of growth it can



achieve). Option D2 scores better than D1 against SA objectives. It also concurs with the Core Strategy objectives and strengthens the regeneration strategy for Hastings and Bexhill.

Option D3 would not contribute towards the vision for a vital town (and District). It would have negative social and economic impacts and result in non-compliance with other policy and initiatives, most notably the South East Plan and local regeneration initiatives for Hastings and Bexhill. It would result in a significant housing shortfall vis-a-vis acknowledged needs.

## Option (E) Hastings Fringes Issues

Option E1 – Hastings Fringes Issues - Continue with Scale of Development Identified in 'Consultation on Strategy Directions'				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	~	~	✓	Development at Breadsell would result in some 200 dwellings (plus employment floorspace) in Rother District, projected for latter part of plan period post-2021. However, proposals for associated development of a further 800 dwellings and neighbourhood centre in Hastings Borough to the south, has since been removed from the Core Strategy (HBC Cabinet Report 01/03/10). Development at Wilting may result in a similar number. <u>By implication, the provision of less homes may result in a weaker score against this SA objective.</u>
2. Improve the health and well-being of the population and reduce inequalities in health	~	~	(✓)	There is a link between good quality affordable housing and health and well-being. Breadsell site close to Hastings Hospital. <u>Therefore, the loss of development from Hastings Fringes (either lost from the housing total or re-directed elsewhere) may score more negatively against this SA objective, since Hastings Fringes sites are comparatively advantageously located.</u>
3. Reduce crime and the fear of crime	~	~	(✓)	Facilitating access to housing of all sectors of society, including disadvantaged groups, may help reduce crime. <u>The affects are marginal, but by implication less overall housing may increase social exclusion which may have a negative effect on crime.</u>
4. Reduce deprivation and social exclusion	~	~	(✓)	Easier access to the housing market may help reduce deprivation and social exclusion, although benefits may be nullified in inaccessible locations.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	Adequately located to maximise opportunities in terms of relative proximity to Colleges and Hastings University
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	~	(✓)	Development at Breadsell would include employment floorspace. <u>By implication the removal of Breadsell from the Strategy will result in less employment floorspace and a weaker score against this SA objective.</u>
7. Improve accessibility to services and facilities for all ages across the District	~	~	✗	Hastings Borough Council's decision not to proceed with proposals for their much larger Breadsell development to the south (including a neighbourhood centre) means that the Rother part of the site would constitute little more than an isolated patch of ribbon development if developed in isolation. Wilting similarly isolated from key services.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	~	~	Although on edge of Hastings, both Breadsell and Wilting relatively inaccessible locations far from cultural and leisure facilities.
9. Improve efficiency in land use and encourage the prudent use of natural resources	~	~	(x)	Will result in land use. Sustainable resource management potentials less clear.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	~	✗	<u>Breadsell is</u> road dependent site unlikely to reduce car usage or have positive impacts elsewhere.
11. Reduce emissions of greenhouse gases	~	~	(x)	Potential for addressing this issue unclear, but development likely to have a negative affect.
12. Minimise the risk of flooding and resulting detriment to people and property	~	~	~	Site not at risk from flooding.
13. Maintain, improve and manage water resources in a sustainable way	~	~	?	Unclear what impact is, but development will have impact on water resources.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	~	~	(x)	Loss of green space in close proximity to SNCI to north and not far from SSSI and LNR to south. As such, Breadsell represents a valuable green corridor link. <u>Natural England objected to development of Hastings BC section of 'land at Breadsell', being highly concerned about the nature and location. NE indicated to HBC that they would be minded to object to any future application to develop this area, since "The application site is directly adjacent to Marline Valley Woods SSSI". NE were of the view that "Any application for housing in this area has the potential to adversely effect the SSSI in the following ways:</u> <u>1. Hydrological Impact – Impacts of the quality and quantity of water feeding into the gill streams within the woodland. These support nationally important bryophyte assemblages within the SSSI.</u> <u>2. Increased visitor disturbance.</u> <u>3. Fragmentation of the SSSI – severing biodiversity links to the wider environment, isolating genetic reserves of flora and fauna."</u> <u>In terms of the SA, it is therefore considered that a reduced scale of development would inevitably score more positively vis-a-vis this SA objective. An increased scale of development would score much worse.</u>
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	~	~	✗	Crucially Breadsell development would result in a substantial erosion of the Strategic Gap between Hastings and Battle. It is also relatively exposed landscape. <u>In terms of the SA, it is therefore considered that a reduced scale of development would inevitably score more positively vis-a-vis this SA objective. An increased scale of development would have still more negative implications.</u>
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	~	(x)	Higher levels of development will result in higher levels of waste generation, although sustainability of method of disposal is also key.
<b>Conformity with other policy/initiatives:</b> Contributes towards SE Plan housing targets.				
<b>Non-conformity:</b> Countryside Gap policy, PPS1, PPS7.				

## Option E: Commentary and Summary

At Core Strategy 'Consultation on Strategy Directions' stage Hastings Fringes was identified as suitable for some 200-450 dwellings and some 10,000 sq.m of business floorspace. In addition it proposed a new railway station in the Wilting area, 'if this is shown to be feasible'. The proposed submission Core Strategy refers to just 45-80 dwellings, but has removed policy reference to development at Breadsell, and an amended reference to 'at least 3,000sq.m of employment floorspace'. The housing and employment numbers have come down largely due the removal of the Breadsell site from the strategy (see option E1). However, it is also worth noting that doubts around sustainability and viability of the enabling development in the vicinity of Wilting also necessitate a more cautious approach. There may still be other smaller scale opportunities to provide housing and employment in the Hastings Fringes area, and the amended Core Strategy figures largely reflect this. ~~The SA for continuing with the level of growth as set out in the Core Strategy 'Consultation on Strategy Directions' is reviewed on the basis that the 'Baldslow Improvement' road scheme has been removed from the Highways Agency's programme, there are no specific plans for a new station at Wilting, and Hastings Borough Council are no longer proposing large-scale development adjacent to land at Breadsell in Rother District.~~

It is important to note that with Option E the alternative is obviously to 'not' continue with the scale of development identified at 'Strategy Directions' stage. The alternative lower level of development is estimated at 45-80 dwellings and at least 3,000 sq.m of employment floorspace, drawing on the SHLAA and the Employment Strategy and Land Review. Therefore by implication, negative SA scores generally imply this lower level of development would be the more sustainable option, as elaborated upon further in the Table E1 of Appendix 5.

The balance of assessments against SA Objectives suggests Breadsell would be an unsustainable development, although it is marginal. This is particularly the case in the absence of an accessible local shopping centre or school (now or planned). The fact that this will now no longer be coming forward in Hastings Borough Council has tipped the balance against this development in terms of SA Objectives. The absence of a clear commitment to a new station at Wilting, together with the severance of the Wilting development area, similarly weighs against it in sustainability terms.

Background evidence in the form of the SHLAA indicated a relative lack of alternative sustainable development opportunities in the Hastings Fringes area that are of a strategic scale, which adds further doubt as to the achievability of the previously identified levels of development at Hastings Fringes.

## Option (F) Battle – Strategic Direction of Growth

Option F1 – Focus new allocations to the south-east of the town.				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	✓	✓	✓	Will result in new housing in line with code for sustainable homes and RDC affordable housing policies.
2. Improve the health and well-being of the population and reduce inequalities in health	✓	✓	✓	There is a link between good quality affordable housing and health and well-being.
3. Reduce crime and the fear of crime	~	~	~	Some links in that reducing deprivation and social exclusion can also be a contributory factor in reducing crime.
4. Reduce deprivation and social exclusion	( ✓ )	( ✓ )	( ✓ )	New housing will help reduce deprivation and social exclusion, although the south-east of Battle is relatively prosperous compared to other parts of the town.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	South east of town is poorly located relative to Battle's primary school and community college. This is only partially compensated by closer proximity to Hastings University and Colleges.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	( ✓ )	( ✓ )	( ✓ )	South east may be marginally preferable in respect of access to Hastings and Marley lane to some extent.
7. Improve accessibility to services and facilities for all ages across the District	~	~	~	Accessibility to some key services (most notably the schools and Battle's main supermarket) would be worse from the SE. Accessibility to Hastings and the train station would be better if development concentrated in SE.
8. Encourage and facilitate increased engagement in cultural and leisure activities	( ✓ )	( ✓ )	( ✓ )	These are primarily within Battle town centre so proximity is key. But Hastings also serves as a destination, so option F1 may be argued to be marginally preferable to F2.
9. Improve efficiency in land use and encourage the prudent use of natural resources	( x )	( x )	( x )	In context of Battle, pre-meditated strategy to focus on one side may fail to acknowledge individual sites of equal merit elsewhere in and around the town.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	( x )	( x )	( x )	Battle Town study demonstrates little difference between options F1 and F2.
11. Reduce emissions of greenhouse gases	( x )	( x )	( x )	Development inevitably comes with some impact. Battle Town study demonstrates little difference between options F1 and F2.
12. Minimise the risk of flooding and resulting detriment to people and property	( ✓ )	( ✓ )	( ✓ )	No real areas at risk of flooding other than some SFRA identified surface water flooding in valley created by railway line
13. Maintain, improve and manage water resources in a sustainable way	~	~	~	Development inevitably comes with some impact. Battle Town study demonstrates little difference between options F1 and F2.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	( x )	( x )	( x )	Proposed areas overlap with Sussex Wildlife Trusts defined 'biodiversity opportunity area'.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB	x	x	x	All areas within AONB and parts visually exposed on ridgeline of landscape.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	( x )	( x )	( x )	Development inevitably comes with some impact.
<b>Conformity with other policy/initiatives:</b> <a href="#">Contribution towards SE plan housing quantity and acknowledged development needs.</a>				
<b>Non-conformity:</b> Strategic Gap. Possible conflict with AONB objectives.				
<b>Commentary and Summary:</b> Option F1 scores well against SA housing objectives, but has mixed results overall and scores slightly worse than Option F2, although the balance is marginal.				

Option F2 – Focus new allocations both within the development boundary and via modest peripheral expansion opportunities (following further work as part of the Site Allocations DPD), with no particular focus on any side of the town.				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	✓	✓	✓	Will result in new housing in line with code for sustainable homes and RDC affordable housing policies.
2. Improve the health and well-being of the population and reduce inequalities in health	( ✓ )	( ✓ )	( ✓ )	There there is a link between good quality affordable housing and health and well-being.
3. Reduce crime and the fear of crime	~	~	~	Some links in that reducing deprivation and social exclusion can also be a contributory factor in reducing crime.
4. Reduce deprivation and social exclusion	✓	✓	✓	New housing will help reduce deprivation and social exclusion, although the south-east of Battle is relatively prosperous compared to other parts of the town, so a more balanced distribution may be preferable in this respect.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	( ✓ )	( ✓ )	( ✓ )	South east of town is poorly located relative to Battle's primary school and community college, so a more balanced distribution (option F2) would be favourable. This is only partially compensated by the south-east's closer proximity to Hastings University and Colleges.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	~	~	South east may be marginally preferable in respect of access to Hastings and Marley lane to some extent.
7. Improve accessibility to services and facilities for all ages across the District	~	~	~	Accessibility to some key services (most notably the schools and Battle's main supermarket) would be worse from the SE. Accessibility to Hastings and the train station would be better if development concentrated in SE.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	~	~	These are primarily within Battle town centre so proximity is key. But Hastings also serves as a destination, so option F1 may be argued to be marginally preferable to F2.
9. Improve efficiency in land use and encourage the prudent use of natural resources	~	~	~	Flexible strategy may allow for most efficient approach to be taken on a site by site basis.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(x)	(x)	(x)	Highly debatable. The Battle Town Study suggests no one area of Battle is significantly preferable to any other in this respect.
11. Reduce emissions of greenhouse gases	(x)	(x)	(x)	Development inevitably comes with some impact. Battle Town study demonstrates little difference between options F1 and F2.
12. Minimise the risk of flooding and resulting detriment to people and property	( ✓ )	( ✓ )	( ✓ )	No flood zones of relevance.
13. Maintain, improve and manage water resources in a sustainable way	~	~	~	Development inevitably comes with some impact. Battle Town study demonstrates little difference between options F1 and F2.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	~	~	~	A more flexible strategy allows fuller consideration to be given to impact upon species and habitats.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	(x)	(x)	(x)	All peripheral areas of Battle within AONB, but a more flexible strategy allows for urban in-fill and to seek areas with less landscape impact.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	(x)	(x)	(x)	Development inevitably comes with some impact.
<b>Conformity with other policy/initiatives:</b> <u>Contribution towards SE plan housing quantity and acknowledged development needs.</u>				
<b>Non-conformity:</b> Possible conflict with AONB objectives.				
<b>Commentary and Summary:</b> Analysis against the SA objectives shows relatively little between options F1 and F2. However it should be remembered that option F2 does not preclude development in the south-east of Battle, but offers a more flexible approach that may still include sites with the south-east. A further factor that tips the balance in favour of option F2 is that the existing large scale commitment at Blackfriars will already result in a substantial focus of development to the south east of Battle. To further entrench this trend would fail to acknowledge that in some respects (and hence for some households) the north and west are locationally preferable. A strategy that does not preclude their needs being met on balance would seem to be the correct one.				

## Option (G) Rye - Scale of Growth

Option G1 – Continue Scale and Rate of Housing Development as set out in the Core Strategy 'Consultation on Strategy Directions' (or equivalent rate of development to 2028)				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	✓	✓	✓	Will result in new housing in line with code for sustainable homes and RDC affordable housing policies.
2. Improve the health and well-being of the population and reduce inequalities in health	✓	✓	✓	There is a link between good quality affordable housing and health and well-being.
3. Reduce crime and the fear of crime	( ✓ )	( ✓ )	( ✓ )	Facilitating access to housing of all sectors of society, including disadvantage groups, may help reduce crime.
4. Reduce deprivation and social exclusion	✓	✓	✓	Easier access to the housing market may help reduce deprivation and social exclusion.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	No clear link.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	~	~	Marginal benefits in higher housebuilding for construction industry. Quantum of employment floorspace for Rye remains unchanged.
7. Improve accessibility to services and facilities for all ages across the District	?	?	?	Dependent on location not on scale of development.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	~	~	No clear link.
9. Improve efficiency in land use and encourage the prudent use of natural resources	(x)	(x)	(x)	More housing and land take will entail greater use of natural resources.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(x)	(x)	(x)	Larger scale of development will come with greater number of transport movements. In terms of air quality, The most relevant roads in Rother with relation to the Dungeness SAC/Dungeness to Pett Level SPA and future SPA extension and Ramsar site are the road linking Winchelsea and Rye (Royal Military Road) and that linking Rye to Rye Harbour, both of which lie within 200m of Rye Harbour LNR. However, air quality impacts were screened out in the 2008 HRA screening report given the small amount of development planned for the Rye/Rye Harbour area and this conclusion was accepted by Natural England.
11. Reduce emissions of greenhouse gases	(x)	(x)	(x)	Higher level of development likely to result in increased emissions.
12. Minimise the risk of flooding and resulting detriment to people and property	x	x	x	Rye area is almost wholly within flood zone, including most housing opportunities identified within the SHLAA.
13. Maintain, improve and manage water resources in a sustainable way	~	~	~	Around Rye, groundwater abstraction is from the Chalk aquifer or the Lower Greensand, neither of which are hydrologically connected to the interest features of Dungeness SAC or Dungeness to Pett Level SPA.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	x	x	x	Greater scale of house building comes with the risk of greater impact on biodiversity in what is a highly sensitive geographic area, although it is important to note even the higher level of development would be highly unlikely to result in the direct loss of important habitat. Impacts are therefore more likely to be indirect. <a href="#">The HRA (for Dungeness SAC, Dungeness to Pett Level SPA and SPA extension; and Dungeness, Romney Marsh and Rye Bay proposed Ramsar site) elaborates further, including recommendations that future planning applications relating to Port expansion determine the number of vehicle movements per day and carry out an air quality assessment including increased nitrogen deposition from shipping emissions and other industrial sources where relevant.</a>
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	(x)	(x)	(x)	Greater scale of house building comes with the risk of greater impact on landscape on townscape.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	(x)	(x)	(x)	Greater scale of house building will almost certainly result in greater level of waste generation.
<b>Conformity with other policy/initiatives:</b> South East Plan.				
<b>Non-conformity:</b> Possible issues with PPS25, PPS9 and HRA				

## Commentary and Summary

~~The alternative is a lower rate of development than that anticipated in the Core Strategy 'Consultation on Strategy Directions', in the light of further evidence (Rye Town Study and Strategic Housing Land Availability Study).~~

It is important to note that with Option G the alternative is, by implication, to 'not' continue with the scale of development identified at 'Strategy Directions' stage. For reasons outlined elsewhere in the SA (option B in particular) and elsewhere in the Core Strategy and supporting evidence (The Rye Town Study in particular); the realistic alternative to option G1 is a lower level of development than that envisaged at 'Strategy Directions' stage. Therefore, by further implication, negative SA scores imply this lower level of development would be the more sustainable option.

The 'Strategy Directions' envisaged 450 dwellings over the period 2006 - 2026. The lower level envisages 250-350 dwellings and at least 10,000 sq.m of employment floorspace over the period 2011-2028 (note different timescales). There are many sustainability issues with the level of housing development formerly proposed within the Strategy Directions for Rye. The SHLAA demonstrated that even those individual sites considered suitable tend to be competing with other uses, have viability issues and almost universal issues of flood risk - and all three of these issues in some cases. Therefore a more cautious approach has been taken forward as outlined in the Rye chapter of the Proposed Submission Core Strategy and the Rye Town Study.

## Appendix 6: Sustainability Appraisal of the Plan Policies

These tables update the version that appeared in Appendices 5 and 6 of the Initial SA in November 2008.

### Introductory and Spatial Policies

Policy OSS1 Overall Spatial Development Strategy		
Objective	Assessment	Comment
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	( √ )	Policy results in housing development, albeit at a reduced scale than previously anticipated.
2. Improve the health and well-being of the population and reduce inequalities in health	( √ )	There is a link between good quality affordable housing and health and well-being.
3. Reduce crime and the fear of crime	( √ )	Facilitating access to housing of all sectors of society, including disadvantaged groups, may help reduce crime.
4. Reduce deprivation and social exclusion	( √ )	Easier access to the housing market may help reduce deprivation and social exclusion.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	Education not specifically mentioned in the Strategy (although it is in the wider Core Strategy), although development generally favourably located to maximise opportunities in terms of relative proximity to Colleges and Hastings University.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	✓	Strategy has a particular focus on economic regeneration of the Hastings & Bexhill area and also supports the rural economy.
7. Improve accessibility to services and facilities for all ages across the District	✓	Development is focused on most accessible 'service centres'.
8. Encourage and facilitate increased engagement in cultural and leisure activities	( √ )	Promotion and facilitation aided by service centre based strategy.
9. Improve efficiency in land use and encourage the prudent use of natural resources	( √ )	Promotion and facilitation aided by service centre based strategy.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and	(x)	Overall traffic volumes likely to continue although strategy may assist in reducing congestion in key areas.
11. Reduce emissions of greenhouse gases	~	Development focussed strategy although sustainable resource management is addressed elsewhere in the document.
12. Minimise the risk of flooding and resulting detriment to people and property	~	Not specifically mentioned, although it is addressed elsewhere in the Core Strategy
13. Maintain, improve and manage water resources in a sustainable way	~	Other cross-cutting policies (SRM2 in particular) should ensure sustainable management of water resources. In terms of maintaining water resources the development required by the strategy is likely to put pressure on resources.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	( √ )	Development will give attention to ecology and avoid valued and protected habitats, although there inevitably may be some impact. A full consideration of protected habitats as well as Biodiversity Action Plan (BAP) habitats has been given consideration throughout the wider process.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	( √ )	Considered carefully in the strategy to minimise the impact of development.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	(x)	Even with high levels of sustainable construction, there will be increased households and consequently waste generation. Sustainable waste management needs to be ensured within new developments and increased recycling and composting rates.
<b>Audit Trail:</b> Updates Box 2 from 'Strategy Directions'. <u>One change from 'Strategy Directions' stage is the change in timescale, extending the plan period to 2028, necessary to ensure a 15 year plan period from plan adoption. It is not considered that this extension to the plan period has any significant affect in sustainability appraisal terms.</u>		
<b>Conclusions / Recommendations:</b> Strategy aims to address regeneration and social exclusion issues are not always compatible with all SA objectives. However, it is also the case the comprehensive nature of environmental policies elsewhere in the Core Strategy are difficult to fully reflect in a short 'overall spatial development strategy'		



Policy OSS2 Bexhill to Hastings Link Road and Development:		
Objective	Assessment	Comment
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	( ✓ )	Link road linked to associated housing development.
2. Improve the health and well-being of the population and reduce inequalities in health	~	Link road will facilitate housing and address housing need as well as addressing regeneration and social exclusion issues. But will result in emissions as a result of vehicle movements.
3. Reduce crime and the fear of crime	~	Not a clear link.
4. Reduce deprivation and social exclusion	✓	Key component of regeneration strategy for Hasting and Bexhill. Well related to those wards in most need.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	( ✓ )	Located accessible to higher education facilities.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	✓	Key component of regeneration strategy for Hasting and Bexhill.
7. Improve accessibility to services and facilities for all ages across the District	( ✓ )	Will facilitate development of new bus routes and general accessibility between Hastings, Bexhill and other areas.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	Not a clear link other than that in relation to accessibility.
9. Improve efficiency in land use and encourage the prudent use of natural resources	~	Will result in some land-take, although opens up potential wind-generated energy alongside road scheme.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	Will reduce road congestion and pollution at key Air Quality Management Areas (AQMA) along Hastings Road (and outside District along Hastings sea-front). The Bexhill- Hastings Link Road will reduce PM10 levels within the AQMA and it remains the action with the greatest identifiable impact. However this has to be balanced by the fact that is unlikely to reduce overall car usage across the District.
11. Reduce emissions of greenhouse gases	~	Mixed influences. Probable increased car usage generally balanced by related factors such as potential to facilitate renewable energy schemes alongside development.
12. Minimise the risk of flooding and resulting detriment to people and property	~	Arguably some indirect positive influence in that it may reduce pressure for development from other areas that may have a flood risk, unlike the areas facilitated by the link road.
13. Maintain, improve and manage water resources in a	~	Little impact, other than from related development.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and	(x)	Some negative impact.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	(x)	Neither AONB or protected habitat, although there will be some landscape impact.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	Spine road may assist with management of waste, but marginal.
<b>Audit Trail:</b> Linked to Box 4 on 'Strategy Directions'.		
<b>Conclusions / Recommendations:</b>		
<p><a href="#">As the Link Road is currently not certain, this SA highlights the sustainability implications of the contingency, and may be read in conjunction with the 'options' assessments as set out in Appendix 5 (particularly option D) in that it deals with a possible eventuality.</a></p> <p><a href="#">The Option D assessments show that there are negative economic and social consequences associated with lower growth than planned, while this assessment is unable to elaborate, as the precise scale and location of development is not set out. Hence further SA of the 'Development and Site Allocations DPD' is needed to inform these decisions.</a></p> <p>Impact mitigated by other policies in the plan including SRM1, SRM2: EN policies, TR2. The Link Road remains the preferable option to achieve the overall aims of the strategy and helps address economic, social and housing related SA objectives.</p>		

Policy OSS3 Use of Development Boundaries			
Objective	Assessment	Revision	Comment
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	~	~	<a href="#">Little influence. Possible minor link in that development boundaries lead to a more sustainable pattern of</a>
2. Improve the health and well-being of the population and reduce inequalities in health	( ✓ )	( ✓ )	<a href="#">More compact development forms improves access to health facilities.</a>
3. Reduce crime and the fear of crime	~	~	<a href="#">Minor relevance</a>
4. Reduce deprivation and social exclusion	~	~	<a href="#">Minor relevance. social inclusion possibly benefits from compact development form.</a>
5. Raise educational achievement levels and develop the opportunities for lifelong learning	( ✓ )	( ✓ )	<a href="#">More compact development forms improves access to education facilities.</a>
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	~	<a href="#">Minor relevance</a>
7. Improve accessibility to services and facilities for all ages across the District	✓	✓	<a href="#">Key purpose of development boundaries. Prevention of urban sprawl and more compact urban form improves accessibility to services and facilities.</a>
8. Encourage and facilitate increased engagement in cultural and leisure activities	( ✓ )	( ✓ )	<a href="#">More compact development forms improves access to cultural and leisure facilities.</a>
9. Improve efficiency in land use and encourage the prudent use of natural resources	✓	✓	<a href="#">Key purpose of development boundaries. Prevention of urban sprawl and more compact urban form linked to efficient use of natural resources</a>
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	( ✓ )	( ✓ )	<a href="#">More viable public transport systems and less reliance on private car can result from compact urban form.</a>
11. Reduce emissions of greenhouse gases	( ✓ )	( ✓ )	<a href="#">Prevention of urban sprawl and more compact urban form linked to efficient use of natural resources</a>
12. Minimise the risk of flooding and resulting detriment to people and property	~	~	<a href="#">Marginal relevance</a>
13. Maintain, improve and manage water resources in a sustainable way	( ✓ )	( ✓ )	<a href="#">Prevention of urban sprawl and more compact urban form linked to efficient use of natural resources</a>
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	( ✓ )	( ✓ )	<a href="#">Prevention of urban sprawl and ribbon development may benefit natural environment.</a>
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	~	~	<a href="#">Prevention of urban sprawl and ribbon development may benefit natural environment and landscape character.</a>
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	( ✓ )	( ✓ )	<a href="#">Prevention of urban sprawl and more compact urban form linked to efficient use of natural resources</a>
<b>Audit Trail:</b> Updates Box 2 from 'Strategy Directions'			
<b>Conclusions / Recommendations:</b> Development boundaries help keep settlements relatively compact in form and preventing urban sprawl and ribbon development. As such a higher proportion of the population is located in proximity of services and recreation facilities and a higher proportion of the population has sustainable travel choices. They therefore help promote a high quality built and natural environment. Generally supports SA objectives by managing development and focussing on sustainable locations. <a href="#">Focused amendment to line 1 has changed little in terms of SA Assessment.</a>			

Policy OSS4 Location of Development			
Objective	Assessment	Revision	Comment
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	( ✓ )	( ✓ )	Policy does not influence the quantum of delivery, but may positively influence sustainability of site development.
2. Improve the health and well-being of the population and reduce inequalities in health	( ✓ )	( ✓ )	Checks on contamination and air quality and the ability to satisfactorily address these.
3. Reduce crime and the fear of crime	~	~	No significant impact on these matters.
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	~	~	
7. Improve accessibility to services and facilities for all ages across the District	( ✓ )	✓	Makes effective use of land within confines of settlements, thus improving accessibility to services and facilities. <a href="#">Revised policy is arguably clearer still in this respect, adding an explicit criterion relating to access to services.</a>
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	✓	✓	Key purpose of the policy.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	( ✓ )	( ✓ )	Considers infrastructure. Makes effective use of land within confines of settlements, thus improving accessibility to services and facilities
11. Reduce emissions of greenhouse gases	( ✓ )	( ✓ )	Considers the low carbon and renewable energy potentials of
12. Minimise the risk of flooding and resulting detriment to people and property	( ✓ )	( ✓ )	Not specifically mentioned in this policy other than in context of coastal erosion. However the issue is picked up elsewhere in the Strategy in Policy EN7) and Policy OSS4 states that 'sites and/or proposals should accord with the relevant policies of this Core Strategy'.
13. Maintain, improve and manage water resources in a sustainable way	( ✓ )	( ✓ )	Not mentioned (although picked up elsewhere in the Strategy in Policy SRM2) and Policy OSS4 states that 'sites and/or proposals should accord with the relevant policies of this Core Strategy'.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	( ✓ )	( ✓ )	Not mentioned (although picked up elsewhere in the Strategy in Policy EN5). However the issue is picked up elsewhere in the Strategy and Policy OSS4 states that 'sites and/or proposals should accord with the relevant policies of this Core Strategy'.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald	✓	✓	Key purpose of the policy.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	~	Not specifically mentioned in this policy.
<b>Audit Trail:</b> Updates boxes 6 and 7 from 'Strategy Directions'			
<b>Conclusions / Recommendations:</b> Policy supports SA objectives. <a href="#">Focused amendment to part (ii) has improved the assessment against SA Objective 7 by adding an explicit criterion relating to access to services.</a>			

<b>Policy OSS5 General Development Considerations</b>		
<b>Objective</b>	<b>Assessment</b>	<b>Comment</b>
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	~	Policy does not influence the quantum of delivery.
2. Improve the health and well-being of the population and reduce inequalities in health	( ✓ )	Addresses needs of disabled users in particular.
3. Reduce crime and the fear of crime	( ✓ )	May help positively 'design out crime'
4. Reduce deprivation and social exclusion	( ✓ )	Helps meet needs of all potential occupiers.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	No significant impact on these matters.
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	✓	Considers density and efficient use of land. Key purpose of policy.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	More of a development Management policy that works at individual site level only.
11. Reduce emissions of greenhouse gases	~	Not considered as part of this policy. However the issues are picked up elsewhere in the Strategy in Policy and Policy OSS5 states that 'In addition to considerations set out by other policies'.
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 by protecting both designated and non-designated but locally important species and habitats	( ✓ )	
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	✓	Supports maintenance of high quality natural and built environment.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	Not considered as part of this policy.
<b>Audit Trail:</b> Updates boxes 6 and 7 from 'Strategy Directions'		
<b>Conclusions / Recommendations:</b> Simplified since previous version, although missing components are arguably contained elsewhere in the Core Strategy. Generally supports SA objectives		

<b>Policy BX1 Overall Strategy for Bexhill</b>		
<b>Objective</b>	<b>Assessment</b>	<b>Comment</b>
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	( ✓ )	Policy linked to housing growth
2. Improve the health and well-being of the population and reduce inequalities in health	✓	Supportive of sport and recreation, welfare of vulnerable groups.
3. Reduce crime and the fear of crime	( ✓ )	Indirect impacts on quality of life and sense of wellbeing.
4. Reduce deprivation and social exclusion	✓	Key emphasis of policy.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	( ✓ )	Part (v) deals with accessibility to education facilities.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	✓	Key emphasis of policy.
7. Improve accessibility to services and facilities for all ages across the District	( ✓ )	Part (v) of policy addresses.
8. Encourage and facilitate increased engagement in cultural and leisure activities	( ✓ )	Addressed by part (ii)
9. Improve efficiency in land use and encourage the prudent use of natural resources	( ✓ )	Encourages efficient land use including creation of green infrastructure.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	Strategy to improve rail bus and cycle. Will reduce congestion in key AQMA area, but likely to result in overall increase in traffic levels.
11. Reduce emissions of greenhouse gases	~	Not specifically mentioned here, but addressed elsewhere in the Core Strategy.
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 by protecting both designated and non-designated but locally important species and habitats	~	
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	( ✓ )	Promotes high quality natural and built environment, although no direct impact upon AONB.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	Not specifically mentioned here, but addressed elsewhere in the Core Strategy.
<b>Audit Trail:</b> Linked to Box 11 of 'Strategy Directions'		
<b>Conclusions / Recommendations:</b> Development mitigated by other policies in the plan including SRM1, SRM2: EN policies, TR2. Policy supports SA objectives..		

<b>Policy BX2 Bexhill Town Centre</b>		
<b>Objective</b>	<b>Assessment</b>	<b>Comment</b>
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	( ✓ )	Virtually no capacity for new housing within central area other than windfalls on brownfield land. Limited scope but high quality residential development facilitated in part (v)
2. Improve the health and well-being of the population and reduce inequalities in health	( ✓ )	Aims to facilitate leisure and increase well-being.
3. Reduce crime and the fear of crime	~	Not specifically mentioned here.
4. Reduce deprivation and social exclusion	( ✓ )	Indirectly through improved public realm and accessibility.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	Not specifically mentioned here.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	✓	Strategy to expand town centre expansion as well as high quality office development.
7. Improve accessibility to services and facilities for all ages across the District	( ✓ )	Strategy aims to improve accessibility to the seafront in particular.
8. Encourage and facilitate increased engagement in cultural and leisure activities	✓	De La Warr Pavilion is cultural destination.
9. Improve efficiency in land use and encourage the prudent use of natural resources	( ✓ )	Co-ordinated town centre initiative promoting efficient land use.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	( ✓ )	Focus on facilities being within walking distance.
11. Reduce emissions of greenhouse gases	~	Not specifically mentioned here.
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 by protecting both designated and non-designated but locally important species and habitats	~	
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	( ✓ )	Emphasis on townscape particularly in respect of conservation area.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	?	Not specifically mentioned here.
<b>Audit Trail:</b> New policy previously incorporated within wider Bexhill policy (Box 10)		
<b>Conclusions / Recommendations:</b> Strong town centre focus supports SA Objectives.		

<b>Policy BX3 Development Strategy</b>		
<b>Objective</b>	<b>Assessment</b>	<b>Comment</b>
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	( ✓ )	Policy linked to housing growth
2. Improve the health and well-being of the population and reduce inequalities in health	~	Not addressed in this policy, but covered elsewhere in Core Strategy.
3. Reduce crime and the fear of crime	( ✓ )	Indirect impacts on quality of life and sense of wellbeing. Improved access to housing and jobs helps reduce social exclusion and causes of crime.
4. Reduce deprivation and social exclusion	( ✓ )	Focussed on regeneration and housing need.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	Not mentioned here, but covered in other policies.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	✓	Key emphasis of policy.
7. Improve accessibility to services and facilities for all ages across the District	~	Not mentioned here, but covered in other policies.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	Addressed by part (ii)
9. Improve efficiency in land use and encourage the prudent use of natural resources	~	Encourages efficient land use although inevitably results in land take.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	Not addressed in this policy, but covered elsewhere in Core Strategy.
11. Reduce emissions of greenhouse gases	~	
12. Minimise the risk of flooding and resulting detriment to people and property	( ✓ )	No development anticipated in flood zones
13. Maintain, improve and manage water resources in a sustainable way	~	Not mentioned here, but covered in other policies.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	~	Not mentioned here, but covered in other policies.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	~	Not mentioned here, but covered in other policies.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	Not mentioned here, but covered in other policies.
<b>Audit Trail:</b> New policy previously incorporated within wider Bexhill policy (Box 10)		
<b>Conclusions / Recommendations:</b> Development mitigated by other policies in the plan including SRM1, SRM2: EN policies, TR2. Policy supports plan Vision, Aim and Objectives.		

<b>Policy HF1 The Hastings Fringes</b>		
<b>Objective</b>	<b>Assessment</b>	<b>Comment</b>
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	~	Minimal housing development arising as a result of the policy.
2. Improve the health and well-being of the population and reduce inequalities in health	( ✓ )	Supportive on new and improved publicly accessible open space.
3. Reduce crime and the fear of crime	~	
4. Reduce deprivation and social exclusion	( ✓ )	Good quality public open space can help address deprivation and social exclusion issues.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	Not mentioned here, but covered in other policies.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	Not mentioned here, but covered in other policies.
7. Improve accessibility to services and facilities for all ages across the District	~	Not mentioned here, but covered in other policies.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	Not mentioned here, but covered in other policies.
9. Improve efficiency in land use and encourage the prudent use of natural resources	~	Not mentioned here, but covered in other policies.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	Not mentioned here, but covered in other policies.
11. Reduce emissions of greenhouse gases	~	Not mentioned here, but covered in other policies.
12. Minimise the risk of flooding and resulting detriment to people and property	~	Not mentioned here, but covered in other policies.
13. Maintain, improve and manage water resources in a sustainable way	~	Not mentioned here, but covered in other policies.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	( ✓ )	Supportive on new and improved publicly accessible open space, including key wetland habitats.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	( ✓ )	Facilitates landscape improvements
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	Not mentioned here, but covered in other policies.
<b>Audit Trail:</b> Previously Box 11 in 'Strategy Directions'		
<b>Conclusions / Recommendations:</b> As highlighted in Appendix 5, the Hastings Fringes housing number has come down considerably. This is discussed more in Appendix 5, Option E.		



Policy RY1: Policy Framework for Rye and Rye Harbour			
Objective	Assessment	Revision	Comment
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	( ✓ )	( ✓ )	Policy supports some new housing to meet needs.
2. Improve the health and well-being of the population and reduce inequalities in health	( ✓ )	( ✓ )	There is a link between good quality affordable housing and health and well-being. Strategy also promotes 'green' tourism and opportunities for leisure.
3. Reduce crime and the fear of crime	~	~	Marginal influence
4. Reduce deprivation and social exclusion	✓	✓	New housing to meet need and new employment
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	~	Not mentioned so marginal influence.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact	✓	✓	Covered in particular by part (vii)
7. Improve accessibility to services and facilities for all ages across the District	( ✓ )	( ✓ )	Covered in particular by part (ii)
8. Encourage and facilitate increased engagement in cultural and leisure activities	( ✓ )	( ✓ )	Covered in particular by part (iii)
9. Improve efficiency in land use and encourage the prudent use of natural resources	~	~	Not mentioned here, but covered in other policies.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	~	Covered in particular by part (ii) in relation to traffic congestion. Pollution and air quality not specifically mentioned although part (xi) commits to strategic gap with
11. Reduce emissions of greenhouse gases	(x)	(x)	Development may inevitably have some impact.
12. Minimise the risk of flooding and resulting detriment to people and property	(x)	(x)	Since virtually all the area is within flood zone, some development within areas at risk seems inevitable.
13. Maintain, improve and manage water resources in a sustainable way	~	~	Issue mentioned in policy RY1 but covered in other policies. It is felt that there is unlikely to be a negative impact from the policy since the relevant HRA stated 'Within Rye area, groundwater abstraction is from the Chalk aquifer or the Lower Greensand, neither of which are hydrologically connected to the interest features of Dungeness SAC or Dungeness to Pett Level SPA.' and 'It is possible to conclude that there is unlikely to be a significant effect on Dungeness SAC/SPA or the future pSPA/pRamsar site through abstraction from the Denge gravels aquifer to support housing in the Romney Marsh area since abstraction from
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	(x)	(x)	Not specifically mentioned other than in the context of tourism. Although this aspect is covered elsewhere in the Strategy, in particular by Policy EN5. It is important to note that the potential for adverse impact does exist.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	~	~	Built environment covered by part (iii). It is important to note that the potential for adverse impact does exist, but it is felt that sufficient safeguards are in place within the Core Strategy which is proposing a less housing development than was proposed at 'Strategy Directions' stage.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	~	Not mentioned here, but covered in other policies.
<b>Audit Trail:</b> Previously Box 15 in 'Strategy Directions'			
<b>Conclusions / Recommendations:</b>			
<p><u>This policy includes housing, employment and retail development, as well as other matters. The HRA (Dungeness SAC, Dungeness to Pett Level SPA and future SPA extension and Ramsar Site) highlighted some potential concerns relating to impacts potentially arising from recreational pressure and activities at Rye Harbour Road and Port of Rye.</u> The AA screening process and Habitats Regulations Assessment recommended amendments needed to be made to the policy and this has been done as part of the process. As a consequence, it is now considered that the policy supports the SA objectives. Development mitigated by other policies in the plan including SRM1, SRM2: EN policies, TR2. <u>Focused amendments to Policy RY1 parts (iii), (iv) and (ix) change little in terms of SA assessment since they merely add clarity, rather than substantially changing content or meaning of the policy.</u></p>			

<b>Policy BA1: Policy Framework for Battle</b>		
<b>Objective</b>	<b>Assessment</b>	<b>Comment</b>
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	✓	Strategy maintains level of housing development identified at 'Strategy Directions' stage.
2. Improve the health and well-being of the population and reduce inequalities in health	( ✓ )	Some influence with regard provision of open space, sport and recreation facilities and housing to meet need.
3. Reduce crime and the fear of crime	~	Marginal influence, although positive if at all.
4. Reduce deprivation and social exclusion	( ✓ )	New housing to meet needs and promotion of local employment
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	No clear link.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	( ✓ )	Strategy facilitates economic growth.
7. Improve accessibility to services and facilities for all ages across the District	( ✓ )	Addressed in part (ii)
8. Encourage and facilitate increased engagement in cultural and leisure activities	( ✓ )	Addressed in parts (i), (iv) and (vii)
9. Improve efficiency in land use and encourage the prudent use of natural resources	~	Not mentioned here, but covered in other policies.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(x)	Development may inevitably have some negative impact.
11. Reduce emissions of greenhouse gases	(x)	Development may inevitably have some negative impact.
12. Minimise the risk of flooding and resulting detriment to people and property	( ✓ )	Little by way of flood zones in and around Battle, so development here may minimise impact elsewhere.
13. Maintain, improve and manage water resources in a sustainable way	~	Not mentioned here, but covered in other policies.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	( ✓ )	Addressed in part (ix)
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	( ✓ )	Addressed in part (i), (vi) and (ix)
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	Not mentioned here, but covered in other policies.
<b>Audit Trail:</b> Development of Box 13 from 'Strategy Directions' stage.		
<b>Conclusions / Recommendations:</b> Development mitigated by other policies in the plan including SRM1, SRM2: EN policies, TR2. Some concerns about road congestion and resulting emissions remain. Policy supports SA objectives overall.		

Policy RA1: Villages			
Objective	Assessment	Revision	Comment
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	✓	✓	Strategy maintains level of housing development identified at 'Strategy Directions' stage.
2. Improve the health and well-being of the population and reduce inequalities in health	( ✓ )	( ✓ )	Some influence with regard provision of open space, sport and recreation facilities and housing to meet need.
3. Reduce crime and the fear of crime	~	~	Marginal influence, although positive if at all.
4. Reduce deprivation and social exclusion	( ✓ )	( ✓ )	New housing to meet needs and promotion of local employment opportunities
5. Raise educational achievement levels and develop the opportunities for lifelong learning	( ✓ )	( ✓ )	Some influence, reference in part (iv). Also location of schools has been a consideration in background evidence.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	( ✓ )	( ✓ )	Strategy facilitates rural economic growth.
7. Improve accessibility to services and facilities for all ages across the District	✓	✓	Key focus of the policy
8. Encourage and facilitate increased engagement in cultural and leisure activities	( ✓ )	( ✓ )	Covered in part iv.
9. Improve efficiency in land use and encourage the prudent use of natural resources	~	~	Not mentioned here, but covered in other policies.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	( x )	( x )	Development likely to lead to more congestion, although accessibility by other transport modes is a key part of service centre approach.
11. Reduce emissions of greenhouse gases	~	~	As above.
12. Minimise the risk of flooding and resulting detriment to people and property	( ✓ )	( ✓ )	Not mentioned here, but covered in other policies.
13. Maintain, improve and manage water resources in a sustainable way	( ✓ )	( ✓ )	Not mentioned here, but covered in other policies.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	( ✓ )	( ✓ )	Covered more fully by Policy EN5 which applies to all geographic areas.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB	( ✓ )	( ✓ )	Partially addressed in part (i), whilst AONB nor landscape are specifically covered by Policy EN1 which applies to all geographic areas..
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	~	Not mentioned here, but covered in other policies.
<b>Audit Trail:</b> Development of Box 17 from 'Strategy Directions' stage.			
<b>Conclusions / Recommendations:</b> Development mitigated by other policies in the plan including SRM1, SRM2: EN policies, TR2. Policy supports SA objectives. <u>Focused amendments, in the form of a minor clarification to part (iii) arguably tightens and strengthens the policy further although no change to SA scores necessary. Also minor amendments to village housing numbers of no overall strategic significance.</u>			

<b>Policy RA2: General Strategy for the Countryside</b>		
<b>Objective</b>	<b>Assessment</b>	<b>Comment</b>
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	~	Not really a central purpose of this policy.
2. Improve the health and well-being of the population and reduce inequalities in health	~	Marginal relationship to this policy.
3. Reduce crime and the fear of crime	~	Marginal relationship to this policy.
4. Reduce deprivation and social exclusion	( ✓ )	Encouragement of appropriate economic activities.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	Not really related to this policy.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	( ✓ )	Encouragement of appropriate economic activities and tourism.
7. Improve accessibility to services and facilities for all ages across the District	~	Marginal relationship to this policy.
8. Encourage and facilitate increased engagement in cultural and leisure activities	( ✓ )	Part vii lends support to appropriate tourism facilities.
9. Improve efficiency in land use and encourage the prudent use of natural resources	( ✓ )	Policies relate to efficient use of land and hence 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	~	Marginal relationship to this policy.
11. Reduce emissions of greenhouse gases	~	Marginal relationship to this policy.
12. Minimise the risk of flooding and resulting detriment to people and property	~	Marginal relationship to this policy, although covered elsewhere in the Core Strategy.
13. Maintain, improve and manage water resources in a sustainable way	~	Marginal relationship to this policy, although covered elsewhere in the Core Strategy.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	~	Marginal relationship to this policy, although covered elsewhere in the Core Strategy.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	✓	Key focus of this policy
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	Marginal relationship to this policy, although covered elsewhere in the Core Strategy.
<b>Audit Trail:</b> Development of Box 18 from 'Strategy Directions' stage.		
<b>Conclusions / Recommendations:</b> Policy supports SA objectives.		

Policy RA3: Development in the Countryside			
Objective	Assessment	Revision	Comment
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	( ✓ )	( ✓ )	Will facilitate some further housing (including affordable) on rural exception sites and as one to one replacement.
2. Improve the health and well-being of the population and reduce inequalities in health	~	~	Marginal relationship to this policy.
3. Reduce crime and the fear of crime	~	~	Marginal relationship to this policy.
4. Reduce deprivation and social exclusion	( ✓ )	( ✓ )	Encouragement of appropriate economic activities.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	~	Not really related to this policy.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact	( ✓ )	( ✓ )	Encouragement of economic activities appropriate to a countryside setting.
7. Improve accessibility to services and facilities for all ages across the District	~	~	Marginal relationship to this policy.
8. Encourage and facilitate increased engagement in cultural and leisure activities	( ✓ )	( ✓ )	Part ii lends support to appropriate tourism facilities.
9. Improve efficiency in land use and encourage the prudent use of natural resources	( ✓ )	( ✓ )	Policies relate to efficient use of land and hence 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	~	~	Marginal relationship to this policy.
11. Reduce emissions of greenhouse gases	~	~	Marginal relationship to this policy.
12. Minimise the risk of flooding and resulting detriment to people and property	~	~	Marginal relationship to this policy, although covered elsewhere in the Core Strategy.
13. Maintain, improve and manage water resources in a sustainable way	~	~	Marginal relationship to this policy, although covered elsewhere in the Core Strategy.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	( ✓ )	( ✓ )	Some relationship (part v), although covered elsewhere in the Core Strategy in more detail.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald	✓	✓	Key focus of this policy
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	~	Marginal relationship to this policy, although covered elsewhere in the Core Strategy.
<b>Audit Trail:</b> Development of Box 18 from 'Strategy Directions' stage.			
<b>Conclusions / Recommendations:</b> Policy generally supports SA objectives. <u>Focused amendment changes very little in this respect, being largely concerned with amendments necessary post NPPF. Such amendments do not alter meaning or intent of policy in any significant way, so SA assessment remains the same.</u>			

Policy RA4: Traditional Historic Farm Buildings			
Objective	Assessment	Revision	Comment
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	( ✓ )	~	<u>Will facilitate some further housing on buildings redundant for agricultural use</u> , although economic and tourism uses are prioritised.
2. Improve the health and well-being of the population and reduce inequalities in health	~	~	Marginal relationship to this policy.
3. Reduce crime and the fear of crime	~	~	Marginal relationship to this policy.
4. Reduce deprivation and social exclusion	( ✓ )	( ✓ )	May help economically, and to a lesser extent address affordable housing need.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	~	Not really related to this policy.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact	✓	✓	Encouragement of economic and tourism activities appropriate to a countryside setting.
7. Improve accessibility to services and facilities for all ages across the District	~	~	Marginal relationship to this policy.
8. Encourage and facilitate increased engagement in cultural and leisure activities	( ✓ )	( ✓ )	Lends support to appropriate tourism facilities.
9. Improve efficiency in land use and encourage the prudent use of natural resources	( ✓ )	( ✓ )	Policies relate to efficient use of land and hence prudent use of natural resources.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	( x )	( x )	Marginal relationship to this policy. Re-use in inaccessible locations may increase congestion.
11. Reduce emissions of greenhouse gases	~	~	Marginal relationship to this policy.
12. Minimise the risk of flooding and resulting detriment to people and property	~	~	Marginal relationship to this policy, although covered elsewhere in the Core Strategy.
13. Maintain, improve and manage water resources in a sustainable way	~	~	Marginal relationship to this policy, although covered elsewhere in the Core Strategy.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	( ✓ )	( ✓ )	Some relationship (part iv), although covered elsewhere in the Core Strategy in more detail.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB	?	?	Protection of high quality landscape is a factor, but dependent on individual scheme.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	~	Marginal relationship to this policy, although covered elsewhere in the Core Strategy.
<b>Audit Trail:</b> Development of Box 18 from 'Strategy Directions' stage. One significant change is in relation to redundant traditional farm buildings, where re-use for affordable housing is now prioritised over standard market housing. It is felt that this change may help contribute towards the serious housing need issues experienced by local people.			
<b>Conclusions / Recommendations:</b> Policy supports SA objectives. <u>Focused amendment that removes affordable housing from hierarchy of re-use weakens the policy against SA objectives</u> , although a necessity in the Core Strategy for practical and viability reasons.			

## Core Policies

Policy SRM1: Towards a Low Carbon Future			
Objective	Assessment	Revision	Comment
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	✓	✓	No impact on quantum but positive contribution towards sustainable construction.
2. Improve the health and well-being of the population and reduce inequalities in health	( ✓ )	( ✓ )	Indirectly contributing towards healthy living environment
3. Reduce crime and the fear of crime	~	~	No clear link with this policy.
4. Reduce deprivation and social exclusion	~	~	Marginal relevance to this policy.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	~	Marginal relevance to this policy.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	✓	✓	Support for innovation in high value low impact renewables
7. Improve accessibility to services and facilities for all ages across the District	~	( ✓ )	<a href="#">Positive links via provision of green infrastructure (to combat climate change).</a>
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	( ✓ )	<a href="#">Positive links via provision of green infrastructure (to combat climate change).</a>
9. Improve efficiency in land use and encourage the prudent use of natural resources	✓	✓	Prudent use of natural resources is key purpose of this policy.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	✓	✓	Links to air quality and also traffic (in part vii).
11. Reduce emissions of greenhouse gases	✓	✓	Key purpose of this policy. <a href="#">Focused amendments help further, in particular reduction in threshold for energy strategy requirement.</a>
12. Minimise the risk of flooding and resulting detriment to people and property	( ✓ )	( ✓ )	Indirect influence
13. Maintain, improve and manage water resources in a sustainable way	~	~	Not directly relevant to this policy.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	( ✓ )	✓	<a href="#">Indirect positive long term influence from promotion of non-polluting forms and combating climate change. Amendments to part (iii)a add further re-assurance regarding protection of sites from inappropriate development.</a>
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	( ✓ )	✓	<a href="#">Some indirect long term link to the quality of the wider environment from promotion of non-polluting forms and combating climate change. Amendments to part (iii)a add further re-assurance regarding protection of heritage from inappropriate development.</a>
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	( ✓ )	✓	<a href="#">Policy element vii supports. Also</a> covered in text of paragraph 13.31.
<b>Audit Trail:</b> Related to Box 31 from 'Strategy Directions' stage.			
<b>Conclusions / Recommendations:</b> Policy supports SA objectives. <a href="#">Focused amendments to part iii add further re-assurance that development of facilities will not have a significant adverse impact on ecological or heritage assets. In addition, amendments to vi clarify GI benefits and reduction in threshold for energy strategy requirement.</a>			

Policy SRM2: Water Management			
Objective	Assessment	Revision	Comment
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	~	~	Not directly relevant to this policy.
2. Improve the health and well-being of the population and reduce inequalities in health	( ✓ )	( ✓ )	Indirect influence on human health.
3. Reduce crime and the fear of crime	~	~	Not directly relevant to this policy.
4. Reduce deprivation and social exclusion	~	~	Not directly relevant to this policy.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	~	Not directly relevant to this policy.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	( ✓ )	( ✓ )	An increasingly innovative sector with some employment.
7. Improve accessibility to services and facilities for all ages across the District	~	~	Not directly relevant to this policy.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	~	Not directly relevant to this policy.
9. Improve efficiency in land use and encourage the prudent use of natural resources	✓	✓	This is a key purpose of this policy, since water is a critical natural resource.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	✓	✓	Emphasis on removal of contaminants and pollutants
11. Reduce emissions of greenhouse gases	( ✓ )	( ✓ )	Recycling and rainwater harvesting all indirectly reduce impacts and emissions.
12. Minimise the risk of flooding and resulting detriment to people and property	✓	✓	Part (iii) promotes sustainable drainage systems (SUDs) and sustainable remediation techniques.
13. Maintain, improve and manage water resources in a sustainable way	✓	✓	The main and critical purpose of this policy
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	( ✓ )	( ✓ )	Indirect benefits through emphasis on removal of contaminants and pollutants
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	~	~	Policy concerned with landscape character, particularly at Bewl, although unclear as to whether this will enhance the landscape.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	✓	✓	Concerned with the sustainable management of waste water.
Audit Trail: Updates Box 32 from 'Strategy Directions'			
Conclusions / Recommendations: Policy positively contributes towards SA Objectives. <a href="#">Focussed amendments have little consequence in terms of assessment against SA objectives.</a>			



<b>Policy C01: Community Facilities &amp; Services</b>		
<b>Objective</b>	<b>Assessment</b>	<b>Comment</b>
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	~	Not directly relevant to this policy.
2. Improve the health and well-being of the population and reduce inequalities in health	✓	Many community facilities have a health role, not just as venues for sport and activities but as community resource hubs, information sharing and venues for health visitors, etc.
3. Reduce crime and the fear of crime	( ✓ )	Venues for information sharing. Increased community engagement can have a positive influence on crime, via neighbourhood watch schemes, etc.
4. Reduce deprivation and social exclusion	✓	Role in helping address social exclusion in particular.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	✓	Community engagement and information sharing, access to PCs etc.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	Marginal influence.
7. Improve accessibility to services and facilities for all ages across the District	✓	Key role in isolated rural communities.
8. Encourage and facilitate increased engagement in cultural and leisure activities	✓	key role of community facilities.
9. Improve efficiency in land use and encourage the prudent use of natural resources	~	Not directly relevant to this policy.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	Not directly relevant to this policy.
11. Reduce emissions of greenhouse gases	~	Not directly relevant to this policy.
12. Minimise the risk of flooding and resulting detriment to people and property	~	Not directly relevant to this policy.
13. Maintain, improve and manage water resources in a sustainable way	~	Not directly relevant to this policy.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	~	Not directly relevant to this policy.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	~	Not directly relevant to this policy.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	Not directly relevant to this policy.
<b>Audit Trail:</b> Updates part of Box 21 from 'Strategy Directions'		
<b>Conclusions / Recommendations:</b> Policy supports SA objectives.		

<b>Policy C02: Provision and Improvement of Healthcare Facilities</b>		
<b>Objective</b>	<b>Assessment</b>	<b>Comment</b>
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	~	Not directly relevant to this policy.
2. Improve the health and well-being of the population and reduce inequalities in health	✓	Key role
3. Reduce crime and the fear of crime	~	Not directly relevant to this policy.
4. Reduce deprivation and social exclusion	✓	Key role
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	Not directly relevant to this policy.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	Not directly relevant to this policy.
7. Improve accessibility to services and facilities for all ages across the District	✓	Key role
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	Not directly relevant to this policy.
9. Improve efficiency in land use and encourage the prudent use of natural resources	~	Not directly relevant to this policy.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	✓	Providing services locally can reduce the need to travel and help reduce road congestion.
11. Reduce emissions of greenhouse gases	~	Not directly relevant to this policy.
12. Minimise the risk of flooding and resulting detriment to people and property	~	Not directly relevant to this policy.
13. Maintain, improve and manage water resources in a sustainable way	~	Not directly relevant to this policy.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	~	Not directly relevant to this policy.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	~	Not directly relevant to this policy.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	Not directly relevant to this policy.
<b>Audit Trail:</b> Updates part of Box 21 from 'Strategy Directions'		
<b>Conclusions / Recommendations:</b> Policy supports SA objectives.		

Policy CO3: Improving Sports and Recreation Provision			
Objective	Assessment	Revision	Comment
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	~	~	Not directly relevant to this policy.
2. Improve the health and well-being of the population and reduce inequalities in health	✓	✓	Key benefits from this policy
3. Reduce crime and the fear of crime	~	~	Not directly relevant to this policy.
4. Reduce deprivation and social exclusion	( ✓ )	( ✓ )	Can have a positive influence on social exclusion in particular. Parks and open spaces provide meeting places and venues for community participation in sports and events.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	~	Not directly relevant to this policy.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	~	Not directly relevant to this policy.
7. Improve accessibility to services and facilities for all ages across the District	✓	✓	Policy focuses on ensuring good accessibility to sports and recreation facilities.
8. Encourage and facilitate increased engagement in cultural and leisure activities	✓	✓	Policy focuses on ensuring good accessibility to leisure facilities.
9. Improve efficiency in land use and encourage the prudent use of natural resources	( ✓ )	( ✓ )	Helps make efficient use of natural resources, e.g. utilising leisure benefits of Bewl reservoir.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	✓	✓	Providing facilities locally can reduce the need to travel and help reduce road congestion.
11. Reduce emissions of greenhouse gases	✓	✓	Open spaces can act as green lungs.
12. Minimise the risk of flooding and resulting detriment to people and property	( ✓ )	( ✓ )	Indirectly helpful. Sufficient quantum of green open space can help reduce surface run-off, a contributory factor to localised flooding.
13. Maintain, improve and manage water resources in a sustainable way	( ✓ )	( ✓ )	Marginal, but making dual use of water resources such as Bewl can be said to contribute towards sustainability.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	✓	✓	Helpful protection of green networks within urban areas and provides pockets of habitats for species. <a href="#">Amendment so that part vi has due regard to environmental considerations arguably strengthens the policy further.</a>
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	✓	✓	Key benefits from this policy
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	~	Not directly relevant to this policy.
Audit Trail: Updates part of Box 21 from 'Strategy Directions'			
Conclusions / Recommendations: Policy supports SA objectives. <a href="#">Focused amendment to part vi strengthens further.</a>			

<b>Policy C04: Supporting Young People</b>		
<b>Objective</b>	<b>Assessment</b>	<b>Comment</b>
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	✓	key part of policy is provision of housing options suited to the needs of young people.
2. Improve the health and well-being of the population and reduce inequalities in health	✓	Emphasis on health in part iv.
3. Reduce crime and the fear of crime	( ✓ )	Indirect positive benefits. Engaging young people can indirectly help reduce crime, particularly 'low level disorder' offences.
4. Reduce deprivation and social exclusion	✓	
5. Raise educational achievement levels and develop the opportunities for lifelong learning	✓	Highlighted in part (iii)
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	( ✓ )	Appeal of District for young adults will be important to sustain economic competitiveness.
7. Improve accessibility to services and facilities for all ages across the District	✓	Accessibility for young people is key part of the policy.
8. Encourage and facilitate increased engagement in cultural and leisure activities	✓	Focus on engagement for the young.
9. Improve efficiency in land use and encourage the prudent use of natural resources	~	Not directly relevant to this policy.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	( ✓ )	Local facilities and services helps reduce the need to travel and resulting road congestion.
11. Reduce emissions of greenhouse gases	~	Only marginally relevant.
12. Minimise the risk of flooding and resulting detriment to people and property	~	Not directly relevant to this policy.
13. Maintain, improve and manage water resources in a sustainable way	~	Not directly relevant to this policy.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	~	Not directly relevant to this policy.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	~	Not directly relevant to this policy.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	Not directly relevant to this policy.
<b>Audit Trail:</b> Develops section on young people from within Section 10 of Strategy Directions.		
<b>Conclusions / Recommendations:</b> Policy supports SA objectives.		

<b>Policy C05: Supporting Older People</b>		
<b>Objective</b>	<b>Assessment</b>	<b>Comment</b>
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	✓	Promoting a range of housing opportunities.
2. Improve the health and well-being of the population and reduce inequalities in health	✓	Access to support services and promotion of active lifestyles.
3. Reduce crime and the fear of crime	( ✓ )	Indirectly may help the 'fear of crime' by facilitating older people to access support services.
4. Reduce deprivation and social exclusion	✓	A key purpose of this policy.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	( ✓ )	Community hubs may help 'lifelong learning' become a reality (e.g providing access and training on internet, etc)
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	Not directly relevant to this policy.
7. Improve accessibility to services and facilities for all ages across the District	✓	Access to care and support services and community hubs is key.
8. Encourage and facilitate increased engagement in cultural and leisure activities	✓	As covered in part (iv)
9. Improve efficiency in land use and encourage the prudent use of natural resources	~	Not directly relevant to this policy.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	( ✓ )	Provision of local services may help reduce the need to travel and road congestion.
11. Reduce emissions of greenhouse gases	~	Marginal influence.
12. Minimise the risk of flooding and resulting detriment to people and property	~	Not directly relevant to this policy.
13. Maintain, improve and manage water resources in a sustainable way	~	Not directly relevant to this policy.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	~	Not directly relevant to this policy.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	~	Not directly relevant to this policy.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	Not directly relevant to this policy.
<b>Audit Trail:</b> Updates Box 23 from 'Strategy Directions'		
<b>Conclusions / Recommendations:</b> Policy supports SA objectives.		

<b>Policy C06: Community Safety</b>		
<b>Objective</b>	<b>Assessment</b>	<b>Comment</b>
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	~	Not directly relevant to this policy.
2. Improve the health and well-being of the population and reduce inequalities in health	✓	Key purpose of this policy.
3. Reduce crime and the fear of crime	✓	Key purpose of this policy.
4. Reduce deprivation and social exclusion	( ✓ )	Feeling of safety and well-being is promoted by this policy and can it turn help address these issues.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	Not directly relevant to this policy.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	Not directly relevant to this policy.
7. Improve accessibility to services and facilities for all ages across the District	( ✓ )	Policy can help other forms of transportation such as cycling and walking safer and hence more appealing.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	Marginal influence.
9. Improve efficiency in land use and encourage the prudent use of natural resources	~	Not directly relevant to this policy.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	✓	Excessive speeds and poor road safety can be a contributory factor to road congestion.
11. Reduce emissions of greenhouse gases	~	Marginal influence.
12. Minimise the risk of flooding and resulting detriment to people and property	~	Not directly relevant to this policy.
13. Maintain, improve and manage water resources in a sustainable way	~	Not directly relevant to this policy.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	~	Not directly relevant to this policy.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	( ✓ )	Promotion of high quality townscape.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	Not directly relevant to this policy.
<b>Audit Trail:</b> Updates Box 24 from 'Strategy Directions'		
<b>Conclusions / Recommendations:</b> Policy supports SA objectives.		

<b>Policy LHN1: Achieving Mixed and Balanced Communities</b>		
<b>Objective</b>	<b>Assessment</b>	<b>Comment</b>
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	✓	Facilitating access to appropriate housing.
2. Improve the health and well-being of the population and reduce inequalities in health	( ✓ )	Access to appropriate and well designed housing can have positive impacts on health.
3. Reduce crime and the fear of crime	~	Marginal relevance. Some positive impacts in relation to reducing deprivation and social exclusion which in turn may help reduce crime.
4. Reduce deprivation and social exclusion	( ✓ )	Some emphasis on range and type of housing to meet needs of all sectors of society.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	Not directly relevant to this policy.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	Marginal impact although housebuilding can be linked to economic growth.
7. Improve accessibility to services and facilities for all ages across the District	~	Not directly relevant to this policy.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	Not directly relevant to this policy.
9. Improve efficiency in land use and encourage the prudent use of natural resources	( ✓ )	Efficiency in land use promoted by development tailored to needs.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	Not directly relevant to this policy.
11. Reduce emissions of greenhouse gases	~	Not directly relevant to this policy.
12. Minimise the risk of flooding and resulting detriment to people and property	~	Not directly relevant to this policy.
13. Maintain, improve and manage water resources in a sustainable way	~	Not directly relevant to this policy.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	~	Not directly relevant to this policy.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	~	Only of marginal relevance.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	Not directly relevant to this policy.
<b>Audit Trail:</b> Updates Box 20 from 'Strategy Directions'. This policy has evolved since the 'Strategy Directions' stage which discussed a district wide mix of 30% 1&2 bed dwellings or the possible option of going further with a 40% requirement in rural areas. These options have been moderated to a more cautious approach in the Proposed Submission Core Strategy, largely based on the advice of completed evidence in the intervening period in the form of the Strategic Housing Market assessment (SHMA). The SHMA also advised on the affordable housing tenure mix included in this policy.		
<b>Conclusions / Recommendations:</b> It is concluded that the Policy positively contributes towards SA Objectives.		

Policy LHN2: Affordable Housing		
Objective	Assessment	Comment
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	✓	Key aim of this policy
2. Improve the health and well-being of the population and reduce inequalities in health	( ✓ )	Access to appropriate and well designed housing can have positive impacts on health.
3. Reduce crime and the fear of crime	( ✓ )	Some relevance. Some positive impacts in relation to reducing deprivation and social exclusion which in turn may help reduce crime.
4. Reduce deprivation and social exclusion	✓	Access to affordable housing to meet needs of all sectors of society.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	Not directly relevant to this policy.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	Marginal impact although house building can be linked to economic growth.
7. Improve accessibility to services and facilities for all ages across the District	~	Not directly relevant to this policy.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	Not directly relevant to this policy.
9. Improve efficiency in land use and encourage the prudent use of natural resources	~	Only marginally relevant.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	Not directly relevant to this policy.
11. Reduce emissions of greenhouse gases	~	Not directly relevant to this policy.
12. Minimise the risk of flooding and resulting detriment to people and property	~	Not directly relevant to this policy.
13. Maintain, improve and manage water resources in a sustainable way	~	Not directly relevant to this policy.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	~	Not directly relevant to this policy.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	~	Not directly relevant to this policy.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	Not directly relevant to this policy.
<p><b>Audit Trail:</b> Updates Box 20 from 'Strategy Directions'.</p> <p>This policy has evolved since the 'Strategy Directions' stage which discussed more ambitious affordable housing percentage targets and various options concerning thresholds. <a href="#">Regarding Option H1, the preferences set out in the Initial SA, and in the Core Strategy 'Consultation on Strategy Directions' were as follows:</a></p> <p><a href="#">Affordable Housing percentages</a></p> <ul style="list-style-type: none"> <li>• 50% in Rural Villages</li> <li>• 40% in Rye and Battle</li> <li>• 35% in Bexhill.</li> </ul> <p><a href="#">Affordable Housing thresholds</a></p> <p><a href="#">Bexhill: 15</a></p> <p><a href="#">Rye and Battle: 10.</a></p> <p><a href="#">Rural Areas: Lower the threshold by either of the methods below:</a></p> <p>a) Lower the rural threshold from 5 to 3, and from 0.2ha to 0.12ha</p> <p>b) Maintain threshold of 5, but require all developments of 3 and 4 bedrooms to provide one affordable dwelling.</p> <p><a href="#">Regarding Option H2, further evidence has been produced in a number of forms, including the Affordable Housing Background Paper (2011), Affordable Housing Viability Assessment (2010), the Strategic Housing Market Assessment Update (2009/10). Numerous options for percentage and threshold have been assessed across the different geographies and it has been concluded that the most desirable options for policy development were as follows:</a></p> <p><a href="#">Bexhill - 30% affordable housing (on sites of 15 or more dwellings)</a></p> <p><a href="#">Battle - 35% affordable housing (on sites of 10 or more dwellings)</a></p> <p><a href="#">Rye - 30% affordable housing (on sites of 10 or more dwellings)</a></p> <p><a href="#">Rural - 40% affordable housing on all sites in rural areas (including the provision for commuted sums on sites of less than 5 dwellings).</a></p> <p>The percentage options have been moderated to a more cautious approach in the Proposed Submission Core Strategy, largely based on the advice of completed evidence in the intervening period in the form of the Strategic Housing Market assessment (SHMA) and the Affordable Housing Viability Study, but also following careful consideration of the emerging economic outlook and through corporate agreement. The proposal for a financial contribution from all rural housing schemes was also considered in evidence work and is considered to be an appropriate option to help address the need for affordable housing in rural areas.</p> <p><b>Conclusions / Recommendations:</b> It is concluded that the policy positively contributes towards SA Objectives. <a href="#">The more recently developed options, as set out in the Proposed Submission Core Strategy Policy LHN2 are concluded to be the more sustainable options in light of the most recent supporting evidence and current market conditions.</a></p>		



Policy LHN3: Rural Exception Sites		
Objective	Assessment	Comment
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	✓	Facilitating access to appropriate housing.
2. Improve the health and well-being of the population and reduce inequalities in health	( ✓ )	Access to appropriate and well designed housing can have positive impacts on health.
3. Reduce crime and the fear of crime	~	Marginal relevance. Some positive impacts in relation to reducing deprivation and social exclusion which in turn may help reduce crime, although exception sites are unlikely to be a significant number.
4. Reduce deprivation and social exclusion	✓	Access to affordable housing to meet needs of all sectors of society.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	Not directly relevant to this policy.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	Marginal impact although housebuilding can be linked to economic growth.
7. Improve accessibility to services and facilities for all ages across the District	~	Not directly relevant to this policy.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	Not directly relevant to this policy.
9. Improve efficiency in land use and encourage the prudent use of natural resources	~	Only marginally relevant.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	Not directly relevant to this policy.
11. Reduce emissions of greenhouse gases	~	Not directly relevant to this policy.
12. Minimise the risk of flooding and resulting detriment to people and property	~	Not directly relevant to this policy.
13. Maintain, improve and manage water resources in a sustainable way	~	Not directly relevant to this policy.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	~	Not directly relevant to this policy.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	(x)	May result in housing developments in locations that would not normally be acceptable in planning policy terms due to overwhelming local housing need.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	Not directly relevant to this policy.
<b>Audit Trail:</b> Updates Box 20 from 'Strategy Directions'.		
<b>Conclusions / Recommendations:</b> Policy supports SA objectives.		

<b>Policy LHN4: Sites Wholly or Substantially for Affordable Housing</b>		
<b>Objective</b>	<b>Assessment</b>	<b>Comment</b>
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	✓	Key aim of this policy
2. Improve the health and well-being of the population and reduce inequalities in health	( ✓ )	Access to appropriate and well designed housing can have positive impacts on health.
3. Reduce crime and the fear of crime	~	Some relevance. Some positive impacts in relation to reducing deprivation and social exclusion which in turn may help reduce crime, although unlikely to be significant.
4. Reduce deprivation and social exclusion	✓	Access to affordable housing to meet needs of all sectors of society.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	Not directly relevant to this policy.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	Marginal impact although housebuilding can be linked to economic growth.
7. Improve accessibility to services and facilities for all ages across the District	~	Not directly relevant to this policy.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	Not directly relevant to this policy.
9. Improve efficiency in land use and encourage the prudent use of natural resources	~	Only marginally relevant.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	Not directly relevant to this policy.
11. Reduce emissions of greenhouse gases	~	Not directly relevant to this policy.
12. Minimise the risk of flooding and resulting detriment to people and property	~	Not directly relevant to this policy.
13. Maintain, improve and manage water resources in a sustainable way	~	Not directly relevant to this policy.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	~	Not directly relevant to this policy.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	~	Not directly relevant to this policy.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	Not directly relevant to this policy.
<b>Audit Trail:</b> Updates Box 20 from 'Strategy Directions'		
<b>Conclusions / Recommendations:</b> Policy supports SA objectives.		

<b>Policy LHN5: Sites for the Needs of Gypsies and Travellers</b>		
<b>Objective</b>	<b>Assessment</b>	<b>Comment</b>
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	✓	Access to accommodation for all groups is key.
2. Improve the health and well-being of the population and reduce inequalities in health	( ✓ )	Access to appropriate accommodation can have positive impacts on health.
3. Reduce crime and the fear of crime	~	Some relevance. Some positive impacts in relation to reducing deprivation and social exclusion which in turn may help reduce crime.
4. Reduce deprivation and social exclusion	✓	Access to affordable housing to meet needs of all sectors of society.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	Not directly relevant to this policy.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	Not directly relevant to this policy.
7. Improve accessibility to services and facilities for all ages across the District	~	Not directly relevant to this policy.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	Not directly relevant to this policy.
9. Improve efficiency in land use and encourage the prudent use of natural resources	~	Not directly relevant to this policy.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	Not directly relevant to this policy.
11. Reduce emissions of greenhouse gases	~	Not directly relevant to this policy.
12. Minimise the risk of flooding and resulting detriment to people and property	~	Not directly relevant to this policy.
13. Maintain, improve and manage water resources in a sustainable way	~	Not directly relevant to this policy.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	~	Not directly relevant to this policy.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	~	Not directly relevant to this policy.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	Not directly relevant to this policy.
<b>Audit Trail:</b> Updates Box 22 from 'Strategy Directions'. Main change is that there is now a higher requirement for pitches as a result of the extension of the plan period to 2028 and further background work.		
<b>Conclusions / Recommendations:</b> Policy supports SA objectives.		

Policy LHN6: Gypsies, Travellers and Travelling Showpeople Criteria		
Objective	Assessment	Comment
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	✓	Access to accommodation for all groups is key.
2. Improve the health and well-being of the population and reduce inequalities in health	( ✓ )	Access to appropriate accommodation can have positive impacts on health.
3. Reduce crime and the fear of crime	~	Not directly relevant to this policy.
4. Reduce deprivation and social exclusion	✓	Access to affordable housing to meet needs of all sectors of society.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	Not directly relevant to this policy.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	Not directly relevant to this policy.
7. Improve accessibility to services and facilities for all ages across the District	~	Not directly relevant to this policy.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	Not directly relevant to this policy.
9. Improve efficiency in land use and encourage the prudent use of natural resources	~	Not directly relevant to this policy.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	Not directly relevant to this policy.
11. Reduce emissions of greenhouse gases	~	Not directly relevant to this policy.
12. Minimise the risk of flooding and resulting detriment to people and property	( ✓ )	Importance acknowledged.
13. Maintain, improve and manage water resources in a sustainable way	~	Not directly relevant to this policy.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	( ✓ )	Importance acknowledged.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	( ✓ )	Importance acknowledged.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	Not directly relevant to this policy.
<b>Audit Trail:</b> Updates Box 22 from 'Strategy Directions'		
<b>Conclusions / Recommendations:</b> Policy supports SA objectives.		

<b>Policy EMP1: Fostering Economic Activity and Growth</b>		
<b>Objective</b>	<b>Assessment</b>	<b>Comment</b>
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	( ✓ )	Marginal relevance in relation to ICT infrastructure for new residential development.
2. Improve the health and well-being of the population and reduce inequalities in health	( ✓ )	Only marginally relevant to this policy in that employment and prosperity have some link to health and reducing inequality.
3. Reduce crime and the fear of crime	( ✓ )	Some relevance. Some positive impacts in relation to reducing deprivation and social exclusion which in turn may help reduce crime.
4. Reduce deprivation and social exclusion	✓	Creation of wealth and employment facilitated by this policy.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	✓	As addressed in part (i).
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	✓	Key element of policy.
7. Improve accessibility to services and facilities for all ages across the District	( ✓ )	Some positive influence via emphasis on ICT connections and transport infrastructure.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	Not directly relevant to this policy.
9. Improve efficiency in land use and encourage the prudent use of natural resources	(x)	Will inevitably result in some land-take, including greenfield.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(x)	Indirectly addressed via part vi, although it is likely that economic growth may come at the price of increased road movements.
11. Reduce emissions of greenhouse gases	(x)	Development may be associated with emissions.
12. Minimise the risk of flooding and resulting detriment to people and property	~	Not directly relevant to this policy.
13. Maintain, improve and manage water resources in a sustainable way	~	Not directly relevant to this policy.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	~	Not directly relevant to this policy.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	?	Dependent on quality, location and mitigation of development.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	Not directly relevant to this policy.
<b>Audit Trail:</b> Updates Box 26 from 'Strategy Directions'		
<b>Conclusions / Recommendations:</b> Policy positively contributes towards SA economic and social objectives, although some concerns about impact on land take, road network and emissions		

Note: EMP policies now re-named EC in Core Strategy

<b>Policy EMP2: Business Land and Premises</b>		
<b>Objective</b>	<b>Assessment</b>	<b>Comment</b>
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	( ✓ )	Marginal relevance in relation to mixed use.
2. Improve the health and well-being of the population and reduce inequalities in health	( ✓ )	Only marginally relevant to this policy in that employment and prosperity have some link to health and reducing inequality.
3. Reduce crime and the fear of crime	( ✓ )	Some relevance. Some positive impacts in relation to reducing deprivation and social exclusion which in turn may help reduce crime.
4. Reduce deprivation and social exclusion	✓	Creation of wealth and employment facilitated by this policy.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	Marginal but positive relevance in relation to lifelong learning through employment
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	✓	Key element of policy.
7. Improve accessibility to services and facilities for all ages across the District	~	Not directly relevant to this policy.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	Not directly relevant to this policy.
9. Improve efficiency in land use and encourage the prudent use of natural resources	✗	Will inevitably result in some land-take, including greenfield.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(✗)	Indirectly addressed via part vi. Although overall it is likely that increased provision of business land will result in more road movements and congestion.
11. Reduce emissions of greenhouse gases	(✗)	Development may be associated with emissions.
12. Minimise the risk of flooding and resulting detriment to people and property	~	Not directly relevant to this policy.
13. Maintain, improve and manage water resources in a sustainable way	~	Not directly relevant to this policy.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	~	Not directly relevant to this policy.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	?	Dependent on quality, location and mitigation of development.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	Not directly relevant to this policy.
<b>Audit Trail:</b> Updates Box 26 from 'Strategy Directions'		
<b>Conclusions / Recommendations:</b> The policy positively contributes towards SA social and economic objectives, although some concern about impact on road movements and emissions.		

<b>Policy EMP3: Existing Employment Sites</b>		
<b>Objective</b>	<b>Assessment</b>	<b>Comment</b>
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	~	Not directly relevant to this policy.
2. Improve the health and well-being of the population and reduce inequalities in health	~	Not directly relevant to this policy.
3. Reduce crime and the fear of crime	~	Not directly relevant to this policy.
4. Reduce deprivation and social exclusion	~	Not directly relevant to this policy.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	Not directly relevant to this policy.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	✓	Key element of policy.
7. Improve accessibility to services and facilities for all ages across the District	( ✓ )	Access improvements may be facilitated.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	Not directly relevant to this policy.
9. Improve efficiency in land use and encourage the prudent use of natural resources	✓	Encouraging efficient use of existing land.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	Not directly relevant to this policy.
11. Reduce emissions of greenhouse gases	~	Not directly relevant to this policy.
12. Minimise the risk of flooding and resulting detriment to people and property	~	Not directly relevant to this policy.
13. Maintain, improve and manage water resources in a sustainable way	~	Not directly relevant to this policy.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	~	Not directly relevant to this policy.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	( ✓ )	Townscape and environmental improvements may be facilitated under part (iii).
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	Not directly relevant to this policy.
<b>Audit Trail:</b> Updates Box 26 from 'Strategy Directions'		
<b>Conclusions / Recommendations:</b> Policy supports SA objectives.		

<b>Policy EMP4: Business Activities Elsewhere Within the District</b>		
<b>Objective</b>	<b>Assessment</b>	<b>Comment</b>
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	( ✓ )	Marginal relevance in relation to mixed use.
2. Improve the health and well-being of the population and reduce inequalities in health	( ✓ )	Only marginally relevant to this policy in that employment and prosperity have some link to health and reducing inequality.
3. Reduce crime and the fear of crime	( ✓ )	Some relevance. Some positive impacts in relation to reducing deprivation and social exclusion which in turn may help reduce crime.
4. Reduce deprivation and social exclusion	✓	Creation of wealth and employment facilitated by this policy.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	Not directly relevant to this policy.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	✓	Key element of policy.
7. Improve accessibility to services and facilities for all ages across the District	~	Not directly relevant to this policy.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	Not directly relevant to this policy.
9. Improve efficiency in land use and encourage the prudent use of natural resources	( ✓ )	Some positive influence in terms of efficient and sustainable re-use and dual use.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	Marginal positive influence. Encouragement of home working may reduce need to travel, balanced against development inevitably resulting in vehicle movements.
11. Reduce emissions of greenhouse gases	~	Marginal positive influence. Encouragement of home working may reduce need to travel, balanced against development inevitably resulting in vehicle movements.
12. Minimise the risk of flooding and resulting detriment to people and property	~	Not directly relevant to this policy.
13. Maintain, improve and manage water resources in a sustainable way	~	Not directly relevant to this policy.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	~	Not directly relevant to this policy.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	( ✓ )	Marginal but positive relevance in relation to usage of premises that may otherwise be redundant
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	Not directly relevant to this policy.
<b>Audit Trail:</b> Updates Box 26 from 'Strategy Directions'		
<b>Conclusions / Recommendations:</b> Policy supports SA objectives.		



<b>Policy EMP5: Support for Key Sectors</b>		
<b>Objective</b>	<b>Assessment</b>	<b>Comment</b>
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	( ✓ )	Some links to sustainable construction industries.
2. Improve the health and well-being of the population and reduce inequalities in health	~	Not directly relevant to this policy.
3. Reduce crime and the fear of crime	~	Not directly relevant to this policy.
4. Reduce deprivation and social exclusion	( ✓ )	Links to creation of wealth and employment facilitated by this policy.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	Not directly relevant to this policy.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	✓	Key purpose of this policy.
7. Improve accessibility to services and facilities for all ages across the District	~	Not directly relevant to this policy.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	Not directly relevant to this policy.
9. Improve efficiency in land use and encourage the prudent use of natural resources	( ✓ )	Promotion of "envir-industries".
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	Not directly relevant to this policy.
11. Reduce emissions of greenhouse gases	( ✓ )	Promotion of "envir-industries".
12. Minimise the risk of flooding and resulting detriment to people and property	~	Not directly relevant to this policy.
13. Maintain, improve and manage water resources in a sustainable way	( ✓ )	Marginal relevance in relation to sensitive land management.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	( ✓ )	Marginal relevance in relation to sensitive land management.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	( ✓ )	Marginal relevance in relation to sensitive land management.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	( ✓ )	Marginal relevance in relation to sensitive land management.
<b>Audit Trail:</b> Updates Box 26 from 'Strategy Directions'		
<b>Conclusions / Recommendations:</b> Policy supports SA objectives.		

<b>Policy EMP6: Tourism Activities and Facilities</b>		
<b>Objective</b>	<b>Assessment</b>	<b>Comment</b>
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	~	Not directly relevant to this policy.
2. Improve the health and well-being of the population and reduce inequalities in health	~	Not directly relevant to this policy.
3. Reduce crime and the fear of crime	~	Not directly relevant to this policy.
4. Reduce deprivation and social exclusion	( ✓ )	Marginal relevance in providing wealth, jobs and reducing deprivation.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	Not directly relevant to this policy.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	✓	Key economic sector promoted.
7. Improve accessibility to services and facilities for all ages across the District	~	Not directly relevant to this policy.
8. Encourage and facilitate increased engagement in cultural and leisure activities	✓	Key purpose of this policy. Perhaps could further reference cultural significance of District and key cultural heritage assets.
9. Improve efficiency in land use and encourage the prudent use of natural resources	( ✓ )	Considered in parts (ii) and (vii)
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	×	Increased visitor numbers may worsen congestion.
11. Reduce emissions of greenhouse gases	?	Increased visitor numbers may result in increased emissions locally, but indirect benefit of increased tourism within UK may reduce demand for environmentally damaging air travel abroad.
12. Minimise the risk of flooding and resulting detriment to people and property	?	Acknowledged in part (ii) but impact unclear.
13. Maintain, improve and manage water resources in a sustainable way	~	Not directly relevant to this policy.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	(x)	Although acknowledged in part ii, there may be pressure on habitats from increased recreation and tourism.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	?	Pressure from visitor numbers balanced by fact that cultural and heritage assets, including townscape and landscape character, are key attractions, thus incentivising their preservation.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	(x)	Pressure on waste disposal in key areas in peak season.
<b>Audit Trail:</b> Updates Box 26 from 'Strategy Directions'		
<b>Conclusions / Recommendations:</b> Policy <u>generally</u> supports SA objectives, <u>although negative impacts upon road congestion, environment (including landscape and townscape) and waste generation and disposal.</u>		

<b>Policy EMP7: Retail Development</b>		
<b>Objective</b>	<b>Assessment</b>	<b>Comment</b>
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	~	Not directly relevant to this policy.
2. Improve the health and well-being of the population and reduce inequalities in health	( ✓ )	Marginal relevance. Focus on compact town centres and walking distance.
3. Reduce crime and the fear of crime	~	Not directly relevant to this policy.
4. Reduce deprivation and social exclusion	( ✓ )	Helps address deprivation by encouraging local spend and local employment.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	Not directly relevant to this policy.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	( ✓ )	Does encourage economic growth and competitiveness to some extent, albeit in lower value, higher impact retail service centre.
7. Improve accessibility to services and facilities for all ages across the District	✓	Key focus on accessible centres.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	Not directly relevant to this policy.
9. Improve efficiency in land use and encourage the prudent use of natural resources	( ✓ )	Key focus on accessible centres.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	✓	Key focus on accessible centres.
11. Reduce emissions of greenhouse gases	( ✓ )	Indirect positive influence in relation to reduced traffic congestion.
12. Minimise the risk of flooding and resulting detriment to people and property	~	Not directly relevant to this policy.
13. Maintain, improve and manage water resources in a sustainable way	~	Not directly relevant to this policy.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	~	Not directly relevant to this policy.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	✓	Compact and legible centres are a valuable contribution towards townscape character.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	Not directly relevant to this policy.
<b>Audit Trail:</b> Updates Box 26 from 'Strategy Directions'		
<b>Conclusions / Recommendations:</b> Policy supports SA objectives.		

<b>Policy EN1: Landscape Stewardship</b>		
<b>Objective</b>	<b>Assessment</b>	<b>Comment</b>
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	~	Not directly relevant to this policy.
2. Improve the health and well-being of the population and reduce inequalities in health	( ✓ )	Marginal links to sense of people's well-being.
3. Reduce crime and the fear of crime	~	Not directly relevant to this policy.
4. Reduce deprivation and social exclusion	~	Not directly relevant to this policy.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	Not directly relevant to this policy.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	Not directly relevant to this policy.
7. Improve accessibility to services and facilities for all ages across the District	~	Not directly relevant to this policy.
8. Encourage and facilitate increased engagement in cultural and leisure activities	✓	Part (iii) of particular relevance and to some extent part (i).
9. Improve efficiency in land use and encourage the prudent use of natural resources	( ✓ )	Marginal relevance in relation to protection of woodland resource.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	Marginal positive impact on air quality.
11. Reduce emissions of greenhouse gases	~	Little if any impacts
12. Minimise the risk of flooding and resulting detriment to people and property	~	Not directly relevant to this policy.
13. Maintain, improve and manage water resources in a sustainable way	( ✓ )	Ponds and water courses key component of landscape as cited in part (viii)
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	( ✓ )	will benefit indirectly from implementation of this policy.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	✓	Key focus of this policy.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	Not directly relevant to this policy.
<b>Audit Trail:</b> Updates Box 28 from 'Strategy Directions'		
<b>Conclusions / Recommendations:</b> Policy positively contributes towards SA Objectives		

<b>Policy EN2: Stewardship of the Historic Built Environment</b>		
<b>Objective</b>	<b>Assessment</b>	<b>Comment</b>
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	~	Not directly relevant to this policy.
2. Improve the health and well-being of the population and reduce inequalities in health	~	Negligible influence on state of well being.
3. Reduce crime and the fear of crime	~	Not directly relevant to this policy.
4. Reduce deprivation and social exclusion	~	Not directly relevant to this policy.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	Not directly relevant to this policy.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	Not directly relevant to this policy.
7. Improve accessibility to services and facilities for all ages across the District	~	Not directly relevant to this policy.
8. Encourage and facilitate increased engagement in cultural and leisure activities	✓	Historic environment of immense cultural significance
9. Improve efficiency in land use and encourage the prudent use of natural resources	( ✓ )	Some relationship to making the best use of land.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	Not directly relevant to this policy.
11. Reduce emissions of greenhouse gases	~	Not directly relevant to this policy.
12. Minimise the risk of flooding and resulting detriment to people and property	~	Not directly relevant to this policy.
13. Maintain, improve and manage water resources in a sustainable way	~	Not directly relevant to this policy.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	~	Not directly relevant to this policy.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	✓	Key part of this policy.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	Not directly relevant to this policy.
<b>Audit Trail:</b> No direct equivalent in 'Strategy Directions', although Box 29 contained some elements		
<b>Conclusions / Recommendations:</b> Policy positively contributes towards SA Objectives		

<b>Policy EN3: Design Quality</b>		
<b>Objective</b>	<b>Assessment</b>	<b>Comment</b>
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	~	Not directly relevant to this policy.
2. Improve the health and well-being of the population and reduce inequalities in health	( ✓ )	Some relationship insofar of quality of living environment influences human health.
3. Reduce crime and the fear of crime	✓	Clear relationship to 'Secured by Design'
4. Reduce deprivation and social exclusion	( ✓ )	Marginal relevance although the introduction of a new well designed development into a neighbourhood suffering from deprivation and social exclusion would undoubtedly be a positive influence.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	Not directly relevant to this policy.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	( ✓ )	Some marginal relationship in that good design quality can attract high value businesses.
7. Improve accessibility to services and facilities for all ages across the District	~	Not directly relevant to this policy.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	Not directly relevant to this policy.
9. Improve efficiency in land use and encourage the prudent use of natural resources	( ✓ )	Some correlation in that careful consideration of setting and context and incorporation of existing features is key to improved efficiency in land use.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	Not directly relevant to this policy.
11. Reduce emissions of greenhouse gases	( ✓ )	Relevant in the context of sustainable design and construction.
12. Minimise the risk of flooding and resulting detriment to people and property	~	Not directly relevant to this policy.
13. Maintain, improve and manage water resources in a sustainable way	~	Not directly relevant to this policy.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	~	Not directly relevant to this policy.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	✓	Key purpose of this policy
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	Not directly relevant to this policy.
<b>Audit Trail:</b> Updates Box 29 from 'Strategy Directions'		
<b>Conclusions / Recommendations:</b> Policy positively contributes towards SA Objectives		

<b>Policy EN4 Management of the Public Realm</b>		
<b>Objective</b>	<b>Assessment</b>	<b>Comment</b>
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	~	Not directly relevant to this policy.
2. Improve the health and well-being of the population and reduce inequalities in health	( ✓ )	Some relationship insofar of quality of living environment influences human health.
3. Reduce crime and the fear of crime	✓	Clear relationship to 'Secured by Design'
4. Reduce deprivation and social exclusion	( ✓ )	Marginal relevance although good management of public realm will undoubtedly benefit a neighbourhood suffering from deprivation and social exclusion would undoubtedly be a positive influence.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	Not directly relevant to this policy.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	( ✓ )	Some marginal relationship in that good quality public realm can attract high value businesses.
7. Improve accessibility to services and facilities for all ages across the District	~	Not directly relevant to this policy.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	Not directly relevant to this policy.
9. Improve efficiency in land use and encourage the prudent use of natural resources	( ✓ )	Some correlation in that maximising potential of the public realm is a component of improved efficiency in land use.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	( ✓ )	Application of principles of 'Streets for All' promotes efficient transport movements
11. Reduce emissions of greenhouse gases	~	Not directly relevant to this policy.
12. Minimise the risk of flooding and resulting detriment to people and property	~	Not directly relevant to this policy.
13. Maintain, improve and manage water resources in a sustainable way	~	Not directly relevant to this policy.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	~	Not directly relevant to this policy.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	✓	Key purpose of this policy
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	Not directly relevant to this policy.
<b>Audit Trail:</b>		
<b>Conclusions / Recommendations:</b> Policy positively contributes towards SA Objectives		

Policy EN5: Biodiversity and Green Space			
Objective	Assessment	Revision	Comment
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	~	~	Not directly relevant to this policy.
2. Improve the health and well-being of the population and reduce inequalities in health	✓	✓	Access to green space and natural areas has links to health and well-being. Pebsham Countryside Park will be accessible to several areas suffering relative deprivation.
3. Reduce crime and the fear of crime	~	~	Not directly relevant to this policy.
4. Reduce deprivation and social exclusion	( ✓ )	( ✓ )	Access to open space is a factor in reducing social exclusion.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	~	Not directly relevant to this policy.
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	✓	✓	Via establishment of new publicly accessible green-spaces.
9. Improve efficiency in land use and encourage the prudent use of natural resources	( ✓ )	( ✓ )	Developing existing areas to enhance them and encourage public use adds this objective.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	✓	✓	Green lungs can help improve air quality particularly in close proximity to urban areas and existing AQMAs. Access to local open spaces can help reduce the need to travel.
11. Reduce emissions of greenhouse gases	✓	✓	
12. Minimise the risk of flooding and resulting detriment to people and property	( ✓ )	( ✓ )	Well managed green infrastructure and wetland habitat can reduce the risks of flooding.
13. Maintain, improve and manage water resources in a sustainable way	✓	✓	Part v particularly relevant in promoting habitats on existing reservoir.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	✓	✓	Key purpose of policy. <a href="#">Focussed amendment to part i adds clarity.</a>
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	✓	✓	Promotion of high quality landscape character.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	~	Not directly relevant to this policy.
Audit Trail: Updates Box 30 from 'Strategy Directions'			
Conclusions / Recommendations: Policy supports overall SA objectives. <a href="#">Focussed amendment to part i adds clarity.</a>			



<b>Policy EN6 Flood Risk Management</b>		
<b>Objective</b>	<b>Assessment</b>	<b>Comment</b>
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	~	Not directly relevant to this policy.
2. Improve the health and well-being of the population and reduce inequalities in health	~	Not directly relevant to this policy.
3. Reduce crime and the fear of crime	~	Not directly relevant to this policy.
4. Reduce deprivation and social exclusion	~	Not directly relevant to this policy.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	Not directly relevant to this policy.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	Not directly relevant to this policy.
7. Improve accessibility to services and facilities for all ages across the District	~	Not directly relevant to this policy.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	Not directly relevant to this policy.
9. Improve efficiency in land use and encourage the prudent use of natural resources	( ✓ )	Leads to efficient land use.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	Not directly relevant to this policy.
11. Reduce emissions of greenhouse gases	~	Not directly relevant to this policy.
12. Minimise the risk of flooding and resulting detriment to people and property	✓	Key purpose of the policy.
13. Maintain, improve and manage water resources in a sustainable way	✓	Key purpose of the policy.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	( ✓ )	Measures to minimise flood risk can positively contribute.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	( ✓ )	Minimising flood risk helps protect high quality natural and built environment
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	Not directly relevant to this policy.
<b>Audit Trail:</b> Updates Box 33 from 'Strategy Directions'		
<b>Conclusions / Recommendations:</b> Policy supports SA objectives.		

<b>Policy EN7: Flood Risk and Development</b>		
<b>Objective</b>	<b>Assessment</b>	<b>Comment</b>
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	( ✓ )	Promotion of sustainable construction
2. Improve the health and well-being of the population and reduce inequalities in health	~	Not directly relevant to this policy.
3. Reduce crime and the fear of crime	~	Not directly relevant to this policy.
4. Reduce deprivation and social exclusion	~	Not directly relevant to this policy.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	Not directly relevant to this policy.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	Not directly relevant to this policy.
7. Improve accessibility to services and facilities for all ages across the District	~	Not directly relevant to this policy.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	Not directly relevant to this policy.
9. Improve efficiency in land use and encourage the prudent use of natural resources	( ✓ )	Leads to efficient land use.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	Not directly relevant to this policy.
11. Reduce emissions of greenhouse gases	~	Not directly relevant to this policy.
12. Minimise the risk of flooding and resulting detriment to people and property	✓	Key purpose of the policy.
13. Maintain, improve and manage water resources in a sustainable way	~	Not directly relevant to this policy.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	( ✓ )	Measures to minimise flood risk such as SUDs can positively contribute.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	( ✓ )	Minimising flood risk helps protect high quality natural and built environment
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	Not directly relevant to this policy.
<b>Audit Trail:</b> Updates Box 33 from 'Strategy Directions'		
<b>Conclusions / Recommendations:</b> Policy supports SA objectives.		

<b>Policy TR1 Management and Investment in Strategic Accessibility</b>		
<b>Objective</b>	<b>Assessment</b>	<b>Comment</b>
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	( ✓ )	Link road will facilitate house building.
2. Improve the health and well-being of the population and reduce inequalities in health	~	Marginal links.
3. Reduce crime and the fear of crime	~	Not directly relevant to this policy.
4. Reduce deprivation and social exclusion	✓	Policy to enable regeneration and reduce entrenched economic and social disparities
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	Not directly relevant to this policy.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	✓	Policy to provide infrastructure for areas of economic activity and investment opportunity.
7. Improve accessibility to services and facilities for all ages across the District	✓	Will improve accessibility by road, bus, train (part iv) and cycle.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	Marginal links.
9. Improve efficiency in land use and encourage the prudent use of natural resources	( ✓ )	Management of strategic accessibility is a key factor in efficient land use.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	( ✓ )	Will reduce congestion and air pollution in key problem AQMA. This is balanced by the fact that it may result in an increase in overall traffic on the roads.
11. Reduce emissions of greenhouse gases	?	Difficult to say - many factors at play.
12. Minimise the risk of flooding and resulting detriment to people and property	~	Not directly relevant to this policy.
13. Maintain, improve and manage water resources in a sustainable way	~	Not directly relevant to this policy.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	(x)	May be some negative impact
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	(x)	May be some negative impact
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	Not directly relevant to this policy.
<b>Audit Trail:</b> Stems from Box 35 of Strategy Directions		
<b>Conclusions / Recommendations:</b> Policy generally supports SA objectives, <a href="#">although possible negative impacts to biodiversity and environment highlighted.</a>		

<b>Policy TR2 Integrated Transport</b>		
<b>Objective</b>	<b>Assessment</b>	<b>Comment</b>
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	~	Not directly relevant to this policy.
2. Improve the health and well-being of the population and reduce inequalities in health	( ✓ )	Provision of high quality cycle network and encouragement of modal shift away from car may have some health benefits.
3. Reduce crime and the fear of crime	~	Not directly relevant to this policy.
4. Reduce deprivation and social exclusion	~	Not directly relevant to this policy.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	Not directly relevant to this policy.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	✓	Efficient and effective transport network key to economic growth.
7. Improve accessibility to services and facilities for all ages across the District	✓	Key purpose of policy.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	May benefit from increased accessibility but influence likely to be marginal.
9. Improve efficiency in land use and encourage the prudent use of natural resources	( ✓ )	Linked to efficient land use. Integrated modes may have environmental benefits.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	✓	Key purpose of policy.
11. Reduce emissions of greenhouse gases	( ✓ )	Should be positive in light of the above
12. Minimise the risk of flooding and resulting detriment to people and property	~	Not directly relevant to this policy.
13. Maintain, improve and manage water resources in a sustainable way	~	Not directly relevant to this policy.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	( ✓ )	Indirect benefits
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	( ✓ )	If successful, policy will have positive benefits
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	Not directly relevant to this policy.
<b>Audit Trail:</b> Stems from Box 35 of Strategy Directions		
<b>Conclusions / Recommendations:</b> Policy supports SA objectives.		

<b>Policy TR3 Access and New Development</b>		
<b>Objective</b>	<b>Assessment</b>	<b>Comment</b>
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	( ✓ )	some relationship, since promotes sustainable layout and locations.
2. Improve the health and well-being of the population and reduce inequalities in health	( ✓ )	Policy may have minor positive influence on people's propensity to walk or cycle.
3. Reduce crime and the fear of crime	~	Not directly relevant to this policy.
4. Reduce deprivation and social exclusion	( ✓ )	Marginal benefits for those without access to private car.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	Not directly relevant to this policy.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	Not directly relevant to this policy.
7. Improve accessibility to services and facilities for all ages across the District	✓	Key role of this policy.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	Not directly relevant to this policy.
9. Improve efficiency in land use and encourage the prudent use of natural resources	✓	Efficient land use includes securing good access to employment, services and community facilities.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	✓	Promoting access issue to key destinations may help reduce congestion.
11. Reduce emissions of greenhouse gases	( ✓ )	Related in terms of efficient land use and reducing the need to travel.
12. Minimise the risk of flooding and resulting detriment to people and property	~	Not directly relevant to this policy.
13. Maintain, improve and manage water resources in a sustainable way	~	Not directly relevant to this policy.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	~	Only very marginally related, in that application of this policy may help indirectly protect further land take and green habitats.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	( ✓ )	Some links in creating a good quality built environment.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	Not directly relevant to this policy.
<b>Audit Trail:</b> Stems from Box 35 of Strategy Directions		
<b>Conclusions / Recommendations:</b> Policy supports SA objectives.		

<b>Policy TR4 Car Parking</b>		
<b>Objective</b>	<b>Assessment</b>	<b>Comment</b>
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	~	Not directly relevant to this policy.
2. Improve the health and well-being of the population and reduce inequalities in health	~	Not directly relevant to this policy.
3. Reduce crime and the fear of crime	( ✓ )	Marginal relationship. Car parking in close proximity to place of residence may help reduce car crime and fear of car crime.
4. Reduce deprivation and social exclusion	~	Very marginal links at most.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	Not directly relevant to this policy.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	( ✓ )	Appropriate and sufficient parking provision is very important for some businesses in choosing where to locate.
7. Improve accessibility to services and facilities for all ages across the District	✓	Accessibility is a key aim for this policy.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	Not directly relevant to this policy.
9. Improve efficiency in land use and encourage the prudent use of natural resources	( ✓ )	Related to efficient land use.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	✓	efficient and legible understanding of, and access to, parking may help reduce congestion.
11. Reduce emissions of greenhouse gases	~	Very marginal relationship related to the above.
12. Minimise the risk of flooding and resulting detriment to people and property	~	Not directly relevant to this policy.
13. Maintain, improve and manage water resources in a sustainable way	~	Not directly relevant to this policy.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	~	Not directly relevant to this policy.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	( ✓ )	Some relationship to townscape quality in efficient management of private vehicles.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	Not directly relevant to this policy.
<b>Audit Trail:</b> Stems from Box 35 of Strategy Directions		
<b>Conclusions / Recommendations:</b> Policy supports SA objectives.		

Policy IM1: Monitoring Framework		
Objective	Assessment	Comment
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	( ✓ )	Monitoring trends and progress and keeping abreast with latest national policy is a component of good sustainable planning.
2. Improve the health and well-being of the population and reduce inequalities in health		
3. Reduce crime and the 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 by protecting both designated and non-designated but locally important species and habitats		
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.		
16. Reduce waste generation and disposal, and achieve the sustainable management of waste		
Audit Trail: Updates Box 37 of Strategy Directions		
Conclusions / Recommendations: Policy supports SA objectives.		

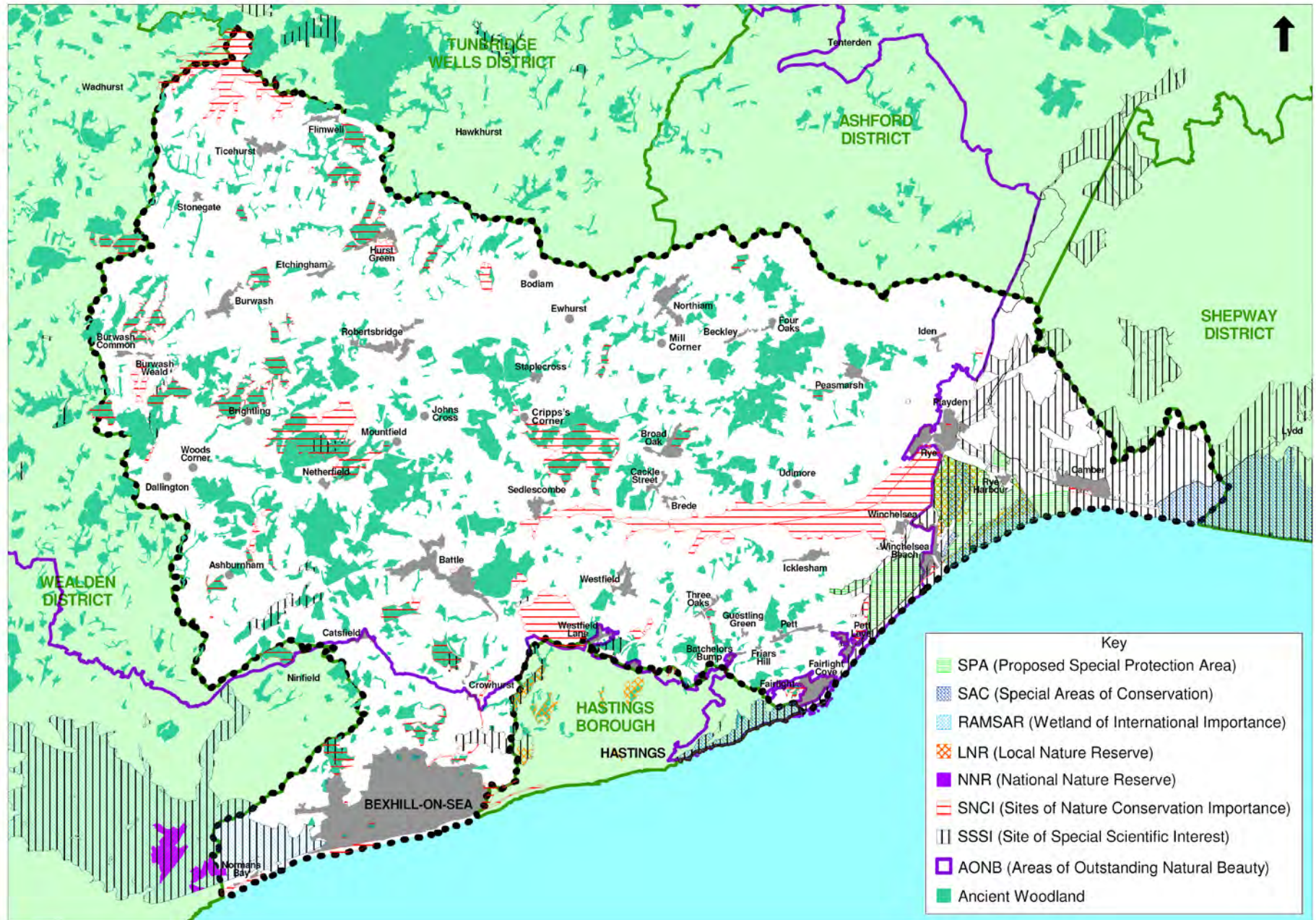
Policy IM2: Implementation and Infrastructure		
Objective	Assessment	Comment
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	( ✓ )	Implementation of appropriate infrastructure is a component to sustainable development planning.
2. Improve the health and well-being of the population and reduce inequalities in health		
3. Reduce crime and the 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 by protecting both designated and non-designated but locally important species and habitats		
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.		
16. Reduce waste generation and disposal, and achieve the sustainable management of waste		
<b>Audit Trail:</b> Updates Box 37 of Strategy Directions		
<b>Conclusions / Recommendations:</b> Policy supports SA objectives.		



Policy IM3 Phasing of Development			
Objective	Assessment	Revision	Comment
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	✓	✓	Phasing may help ensure continuity of supply appropriate to local context. <a href="#">Focused amendment to accord with housing delivery requirements of NPPF.</a>
2. Improve the health and well-being of the population and reduce inequalities in health	( ✓ )	( ✓ )	Some relationship in access to housing to people's health and well-being.
3. Reduce crime and the fear of crime	~	~	Marginal linkage.
4. Reduce deprivation and social exclusion	( ✓ )	( ✓ )	Continued access to housing can help reduce social exclusion.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	( ✓ )	( ✓ )	Relationship to maintaining schools at an efficient capacity so that the Education Authority is not obliged to cope with sudden influxes of numbers.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	( ✓ )	( ✓ )	Phasing is a key component of sustainable development planning
7. Improve accessibility to services and facilities for all ages across the District	( ✓ )	( ✓ )	Phasing is a key component of sustainable development planning
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	~	Marginal linkage.
9. Improve efficiency in land use and encourage the prudent use of natural resources	( ✓ )	( ✓ )	Relationship to efficient land take and usage.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	( ✓ )	( ✓ )	Phasing may help development to be planned alongside transport infrastructure.
11. Reduce emissions of greenhouse gases	( ✓ )	( ✓ )	Phasing is a key component of sustainable development planning
12. Minimise the risk of flooding and resulting detriment to people and property	( ✓ )	( ✓ )	Phasing may help development to be planned alongside sewerage infrastructure.
13. Maintain, improve and manage water resources in a sustainable way	~	~	Marginal linkage.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important	~	~	Not directly relevant to this policy.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	~	~	Marginal linkage.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	~	Marginal linkage.
<b>Audit Trail:</b> Updates Box 37 of Strategy Directions			
<b>Conclusions / Recommendations:</b> Policy supports SA objectives. <a href="#">Focused amendment to part (i) has little consequence in terms of assessment against SA objectives.</a>			

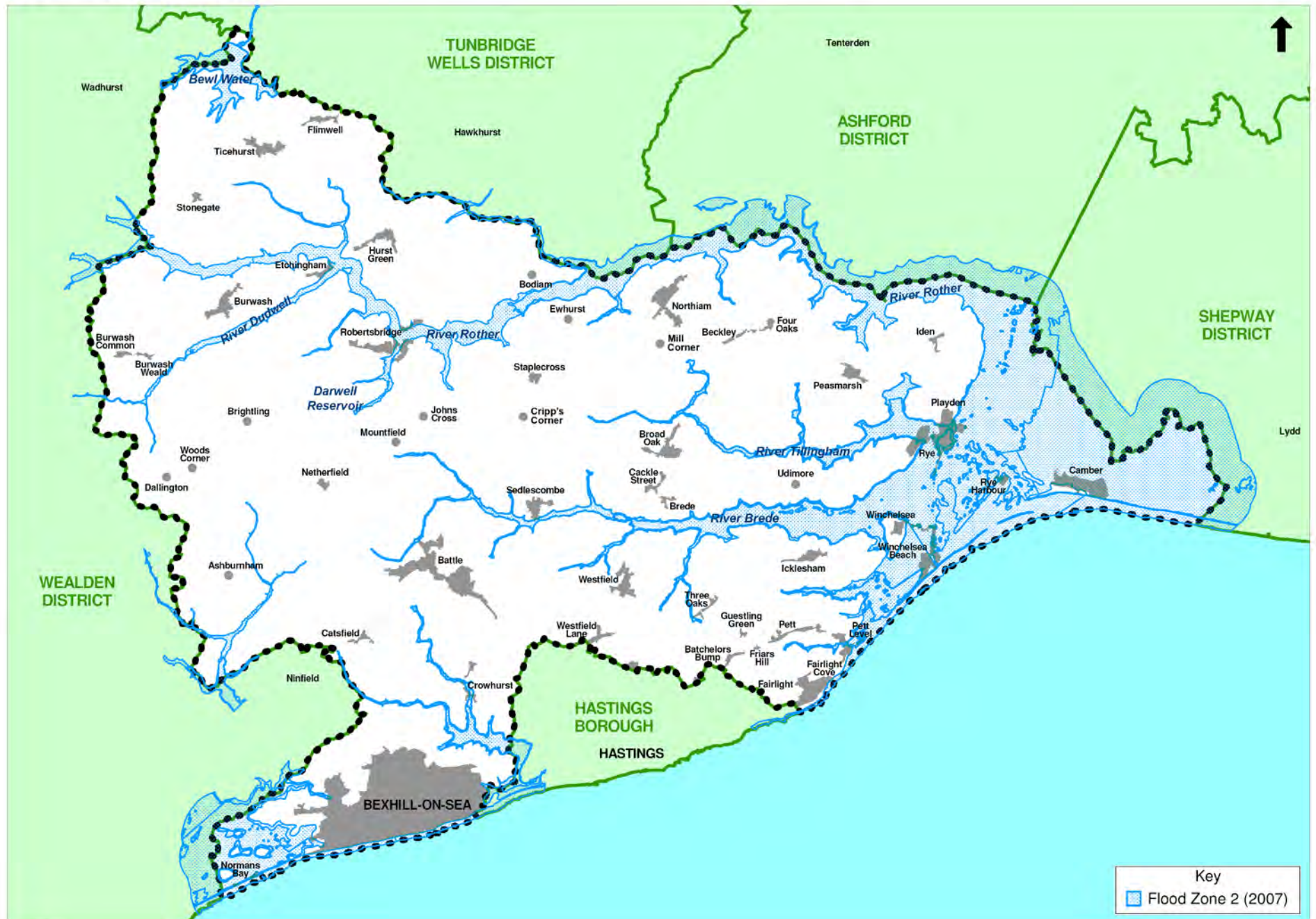
# MAPS

MAP 1: Environmental Designations



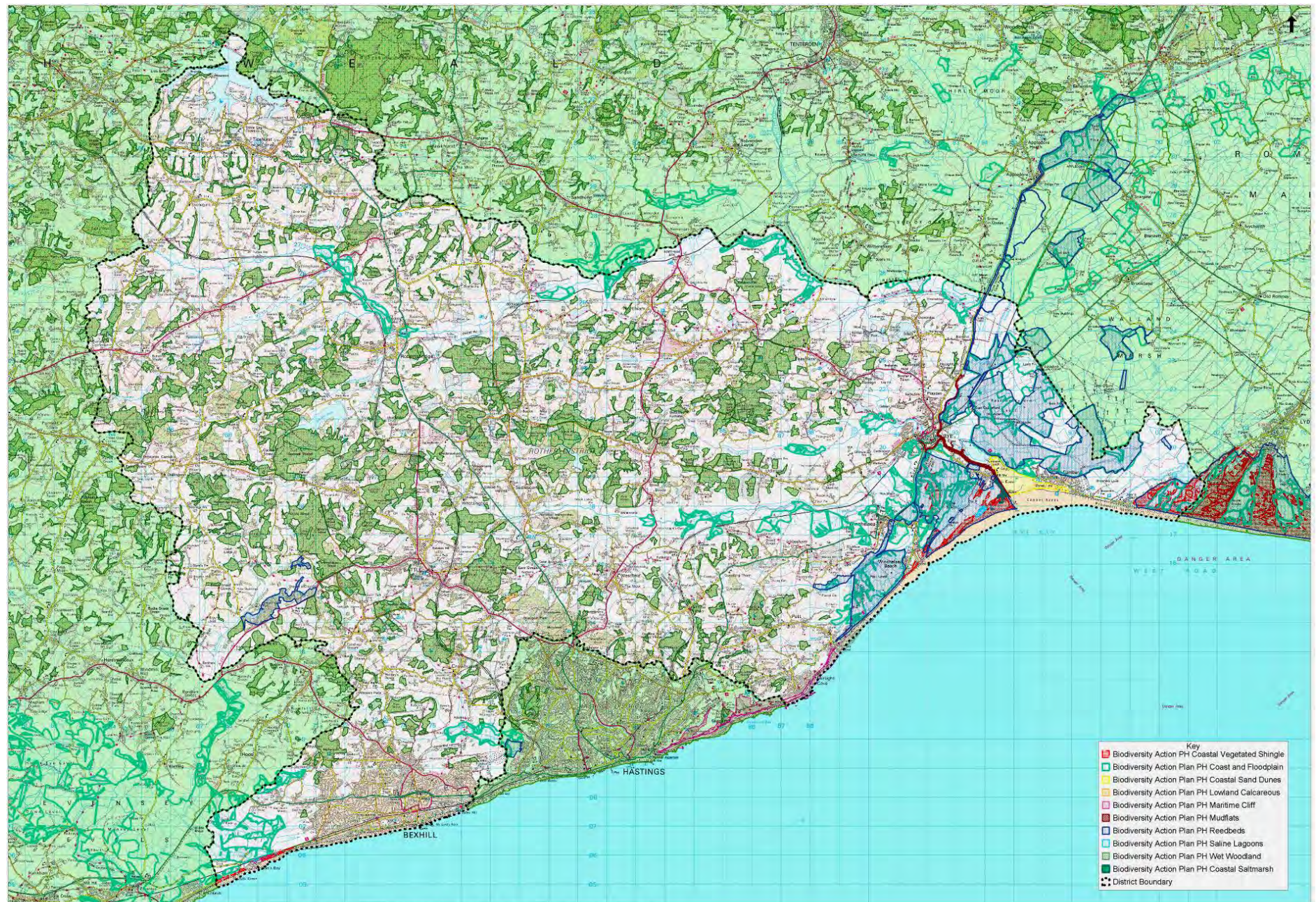


MAP 2: Flood Risk Areas





### MAP3: Biodiversity Action Plan Habitats





## MAP 4: Rother District Area

### Rother District



### East Sussex boroughs/districts



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