



# Sustainability Appraisal

## Main Document



## Development and Site Allocations Local Plan

### Options and Preferred Options

**Rother District Council  
Development and Site Allocations Local Plan  
Options and Preferred Options**

## **Sustainability Appraisal**

**Main Document**

**Rother District Council  
Town Hall  
Bexhill-on-Sea  
East Sussex  
TN39 3JX**

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



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Appendix 3 Assessment of Development Policy Options

Appendix 4 Assessment of Site Policy Options

## **NON-TECHNICAL SUMMARY**

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

- 1 The purpose of Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) is to help planning authorities contribute to achieving sustainable development in preparing their plans. „Sustainable development“ aims to integrate the need to stimulate economic growth, to deliver the needs of all sectors of society, and to conserve and enhance the local environment.
- 2 SEA involves examining certain plans and programmes primarily for significant environmental effects. SA widens the approach to include social and economic as well as environmental issues. Local Planning Authority (LPA) plans must undergo both the process of SA and SEA as a result of legislative changes enacted in the UK in summer 2004.
- 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.

### **The Development and Site Allocations Plan Local Plan (DaSA)**

- 4 The DaSA is the second part of Rother District Council's Local Plan to 2028. Part one of the Local Plan, the 'Core Strategy', was adopted in 2014. The adopted Core Strategy was subject to its own Sustainability Appraisal process. The DaSA will develop the spatial strategies, strategic objectives and core policies set out in the '[Core Strategy](#)'. It will achieve this by reviewing existing site allocations and development boundaries, and by allocating specific areas of land for particular uses in line with the development provisions of the Core Strategy. It will also set out more detailed policies where these are needed to provide guidance for the effective management of development in relation to key issues, such as affordable housing. Rother District Council is responsible for the DaSA.

### **The Sustainability Appraisal (SA) of the DaSA**

- 5 This report forms part of the Sustainability Appraisal (SA) of the DaSA. It represents the combined output of the SA and SEA processes and hereafter is called the DaSA SA.

- 6 The stages of the DaSA SA preceding this report culminated in the publication of a DaSA SA Scoping Report. The Scoping Report established the SA Framework for assessment, including decision-aiding questions and indicators. The DaSA SA Scoping Report also documents the results of the gathering of evidence concerning the current social, economic and environmental conditions in the District. The DaSA SA Scoping Report identified key sustainability problems or likely future problems by looking at statistical trends and comparing the performance of the District with East Sussex as a whole, the South East and England. These processes have been continued in this report.
- 7 This version of the DaSA SA is published to support the DASA 'Options and Preferred Options' consultation, the first public consultation stage of the DaSA<sup>1</sup>.
- 8 As well as drawing upon the DaSA SA Scoping Report, this report draws upon the SA of Part 1 of the Local Plan – the „Core Strategy“. As set out in paragraph 4 above, the DaSA will develop the spatial strategies, strategic objectives and core policies set out in the Core Strategy, which have already been subject to SA. Therefore the DaSA SA needs to be read in this context.

### **Outcomes of the Sustainability Appraisal (SA) process**

- 9 The outcome of the preliminary „Scoping“ stage of the DaSA SA process was a refined SA Framework, comprising a set of sixteen Sustainability Objectives, supported by „Decision-aiding questions“ and indicators. The scoping Report was produced in close liaison with statutory environmental agencies (Natural England, the Environment Agency and Historic England).
- 10 Table 1 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 Appendices 3 and 4.

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<sup>1</sup> In accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

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

<b>Sustainability Appraisal Objectives</b>	
<b>1</b>	<p><b><i>Ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home</i></b></p> <p>The significant effects on this SA Objective are beneficial. The plan successfully identifies a good supply of site-specific deliverable opportunities to meet the housing requirements of the Core Strategy (excluding Neighbourhood Plan areas). These support sympathetic accommodation of housing growth in sustainable locations and appear likely to be deliverable and viable.</p>
<b>2</b>	<p><b><i>Improve the health and well-being of the population and reduce inequalities in health</i></b></p> <p>Overall effects of the plan on the health objective are positive. Positive effects stem from a number of housing policies that aim to improve the living environment, notably the policy options on accessible and adaptable homes. Environmental policies also have beneficial effects, such as policies on environmental pollution and biodiversity &amp; green infrastructure. Site specific policies that lead to the provision of, or are readily accessible to, green infrastructure (with its acknowledged health benefits) are also beneficial, as are housing sites located in close proximity to medical facilities.</p>
<b>3</b>	<p><b><i>Reduce crime and the fear of crime</i></b></p> <p>Effects on this objective are overwhelmingly neutral. Those effects that have been identified relate to specific sites, their proximity to a police station and/or the extent to which they may incorporate a degree of informal surveillance/overlooking and can potentially be designed in such a way as to reduce crime or the fear of crime.</p>
<b>4</b>	<p><b><i>Reduce deprivation and social exclusion</i></b></p> <p>Most policies have been judged to have either a neutral, or a minor beneficial effect, on reducing deprivation and social exclusion. Depending on their location, a significant number of sites identified are considered to have positive effects due to promoting integration with existing communities.</p>
<b>5</b>	<p><b><i>Raise educational achievement levels and develop the opportunities for lifelong learning</i></b></p> <p>Overall, there are beneficial effects for this objective from the plan. There has been a considerable focus on locating development in locations with good accessibility to education facilities. This is in accordance with the service centre approach.</p>
<b>6</b>	<p><b><i>Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities</i></b></p> <p>Cumulatively, the plan has a positive effect on economic growth. In particular, policy DEC3 offers valuable protection to existing employment sites, whereas Policy DCO1 similarly offers some protection to sites of social or economic value. Policy DIM1 on comprehensive development is considered to be likely to be beneficial on balance in promoting mixed-uses sites that secure a range of benefits, including economic, in addition to residential. Policies that define town centre and commercial areas (BEX12, BEX13, BEX14, and BEX6) are also viewed to have a positive effect on economic growth and competitiveness.</p>



<b>7</b>	<p><b><i>Improve accessibility to services and facilities for all ages across the District</i></b></p> <p>Overall, there are beneficial effects for this objective from the plan. The original Core Strategy distribution of development was primarily a „service centre” based approach. The DaSA follows on from, and conforms with, the Core Strategy. Therefore, there has been an in-built focus on locating development in locations with good accessibility to education facilities particularly primary schools. The overwhelming majority of sites score positively in this respect.</p>
<b>8</b>	<p><b><i>Encourage and facilitate increased engagement in cultural and leisure activities</i></b></p> <p>Generally, the plan has a positive effect on this objective. Many generic policies are neutral or not relevant to this objective, although Policy DCO1 which seeks to protect sites of social value is a notable positive effect. Most site allocations are positive, since their proximity to cultural and leisure facilities has been a key factor in the consideration of their suitability. Perhaps the most significant policy in the plan in terms of Objective 8 is BEX14 which proposes to define a „Bexhill Cultural Area” where arts, culture and tourism will be the primary focus.</p>
<b>9</b>	<p><b><i>Improve efficiency in land use and encourage the prudent use of natural resources</i></b></p> <p>Whilst the balance of effects on this objective are positive, the scale of development required inevitably means that development of green-field sites will be necessary. Therefore, the significance of beneficial effects is reducing over time as previously developed land and infill opportunities unfortunately become scarcer. The ability of a site to make best use of developable land and apply suitable density standards has been a factor in considerations on a site by site basis, for which most site-specific policies respond positively.</p>
<b>10</b>	<p><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></p> <p>In a rural District that is accommodating significant growth, positive scores for <i>reducing road congestion</i> are difficult to achieve, particularly as public transport options also tend to be limited or infrequent, and subject to increasing economic pressures nationwide. Nonetheless, the plan has endeavoured to increase travel choice by prioritising accessible locations.</p>
<b>11</b>	<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 an adverse effect on reducing greenhouse gas emissions, although the plan makes positive efforts to reduce the need to travel by car on a site-by-site basis by promoting walking and cycling. Policy options for renewable energy are part of the consultation, which will develop pre-existing Core Strategy policy SRM1 further. The plan will probably avoid a net loss of trees, since all areas of woodland have been avoided.</p>

12	<p><b><i>Minimise the risk of flooding and resulting detriment to people and property</i></b></p> <p>The effects on objective 12 are overwhelmingly positive. Notably, policy DEN5 with its emphasis on sustainable drainage (SuDS), as well as the means to achieve this, is a major positive. Promotion of wetland habitats under Policy DEN4, which may have a multi-functional benefit as SuDS, may also be indirectly beneficial. The majority of site allocations have successfully avoided or mitigated significant flood risk. Scores are therefore generally positive and reduce the proportion of properties at risk from flooding in the District.</p>
13	<p><b><i>Maintain, improve and manage water resources in a sustainable way</i></b></p> <p>The plan, particularly Policy DRM1, will have a positive effect on water efficiency by applying a higher water efficiency standard. Site policies are also generally positive, avoiding groundwater source protection zones / aquifers and generally positively incorporating watercourses within layouts.</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 plan will have a generally positive and beneficial overall effect on objective 14, particularly via policy DEN4 „Biodiversity and green space“, but also DEN5, HAS4 and HAS5. The positive measures required by DEN4, as well as Core Strategy EN5, on which it is based, include a focus on provision of priority habitats and connectivity, as well as the avoidance of harm to existing ecological features. These sentiments have generally been reflected in site layouts and parameters which also positively address the issue; hence a number of positive scores for objective 14 in relation to site policies.</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>Several emerging DaSA policies are identified as having positive effects on townscape and built environment. Policies DEN1 and DEN2 have a notably positive effect on landscape and High Weald AONB character, supported by DEN3, DEN4 and DEN7. Policies DHG5, DHG6, DHG7 and DEC1 will have positive effects in terms of townscape.</p> <p>In addition, many site-specific policies are also deemed to have a positive effect. This is despite the fact that many are actually greenfield sites within the AONB itself. This is because sites have been carefully selected to avoid negative landscape impacts as far as possible, including negative impacts on key features of the High Weald AONB. Positive treatments have included landscaping to enhance the immediate environment.</p>
16	<p><b><i>Reduce waste generation and disposal, and achieve the sustainable management of waste</i></b></p> <p>Effects on objective 16 are largely neutral. There are two household waste recycling facilities in the District – at Mountfield (on the A21 north of Battle) and at Pebsham (Between Bexhill and Hastings). Development locations accessible to these two sites, and to a secondary extent, accessible to the more numerous „bring“ recycling sites are deemed to score more positively against objective 16.</p>

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

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

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

- 12 Persons and/or organisations will be able to comment on this SA report, including statements of objection or support, via the consultation on the overarching plan – the Development and Site Allocations Plan (DASA) – Options and Preferred Options.
- 13 Please refer to the Councils' web-site for details  
<http://www.rother.gov.uk/DaSA>

## **1. CONTEXT**

### **1.1 Introduction**

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

### **1.2 The Development and Site Allocations Local Plan (DaSA)**

- 1.2.2 The DASA is the second part of Rother District Council's Local Plan to 2028.

#### Relationship to Part 1 of the Local Plan – the Core Strategy

- 1.2.3 Part one of the Local Plan, the 'Core Strategy', was adopted in 2014. The adopted Core Strategy was subject to its own Sustainability Appraisal process. This is relevant since in accordance with the NPPF (para.167):

*“Assessments should be proportionate, and should not repeat policy assessment that has already been undertaken.”* Therefore, it is not the role of this Sustainability Appraisal of the DaSA to re-visit the over-arching strategic decisions of the Core Strategy.

#### Role and Context

- 1.2.4 The DaSA will develop the spatial strategies, strategic objectives and core policies set out in the '[Core Strategy](#)', which was part one of the Local Plan. It will achieve this by reviewing existing site allocations and development boundaries, and by allocating specific areas of land for particular uses in line with the development provisions of the Core Strategy. It will also set out more detailed policies where these are needed to provide guidance for the effective management of development in relation to key issues, such as affordable housing. Rother District Council is responsible for the DaSA.

## Programme and Consultation

- 1.2.5 The programme for DaSA production will be set out in the forthcoming review of the Council's Local Development Scheme (LDS). This version of the DaSA Sustainability Appraisal is published to support the DaSA 'Options and Preferred Options' consultation, the first public consultation stage of the DaSA<sup>2</sup>.

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

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

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<sup>2</sup> In accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

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

- 1.4.1 The SA/SEA is an on-going and iterative process that feeds into and informs plan-making.
- 1.4.2 The Council is required by law to produce a Sustainability Appraisal (SA) (incorporating Strategic Environmental Assessment (SEA)) for all of its Local Plan (2011-2028) documents except for the Statement of Community Involvement, the Annual Monitoring Report, Supplementary Planning Documents (SPDs) and the Local Development Scheme.
- 1.4.3 Several SA reports were produced supporting part one of the Rother District Local Plan (2011-28) – the Core Strategy. The documents in question can be found at <http://www.rother.gov.uk/sa>. This SA is being undertaken to inform part two of the Local Plan (2011-28) - the Rother District Development and Site Allocations Local Plan (DaSA).
- 1.4.4 The process of SA is set out in the national Planning Practice Guidance, as in the Figure 1, which sets out a number of stages to the SA.
- 1.4.5 The first stage of the DaSA SA was the Scoping Report, published in August 2016, which set out the framework for the SA. With reference to Figure 1, the SA Scoping Report represents Stage A in the process. It established the SA Framework for the DaSA. The SA Framework is set within the context of existing plans and policies, and an understanding of the current baseline situation is essential to help predict effects and identify key sustainability issues. The full DaSA SA Scoping Report can also be found on the Council's website at <http://www.rother.gov.uk/sa>.
- 1.4.6 This Report represents Stage B of the process, as applied to the Rother DASA. Stage B is 'Developing and Refining Alternatives and Assessing Effects'. As described in Figure 1, it is concurrent with the regulation 18 consultation stage of Local Plan preparation. Therefore this DaSA SA will be published alongside the 'Options and Preferred Options' version of the DaSA.

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

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



Figure 1: Sustainability Appraisal Process for Local Plans

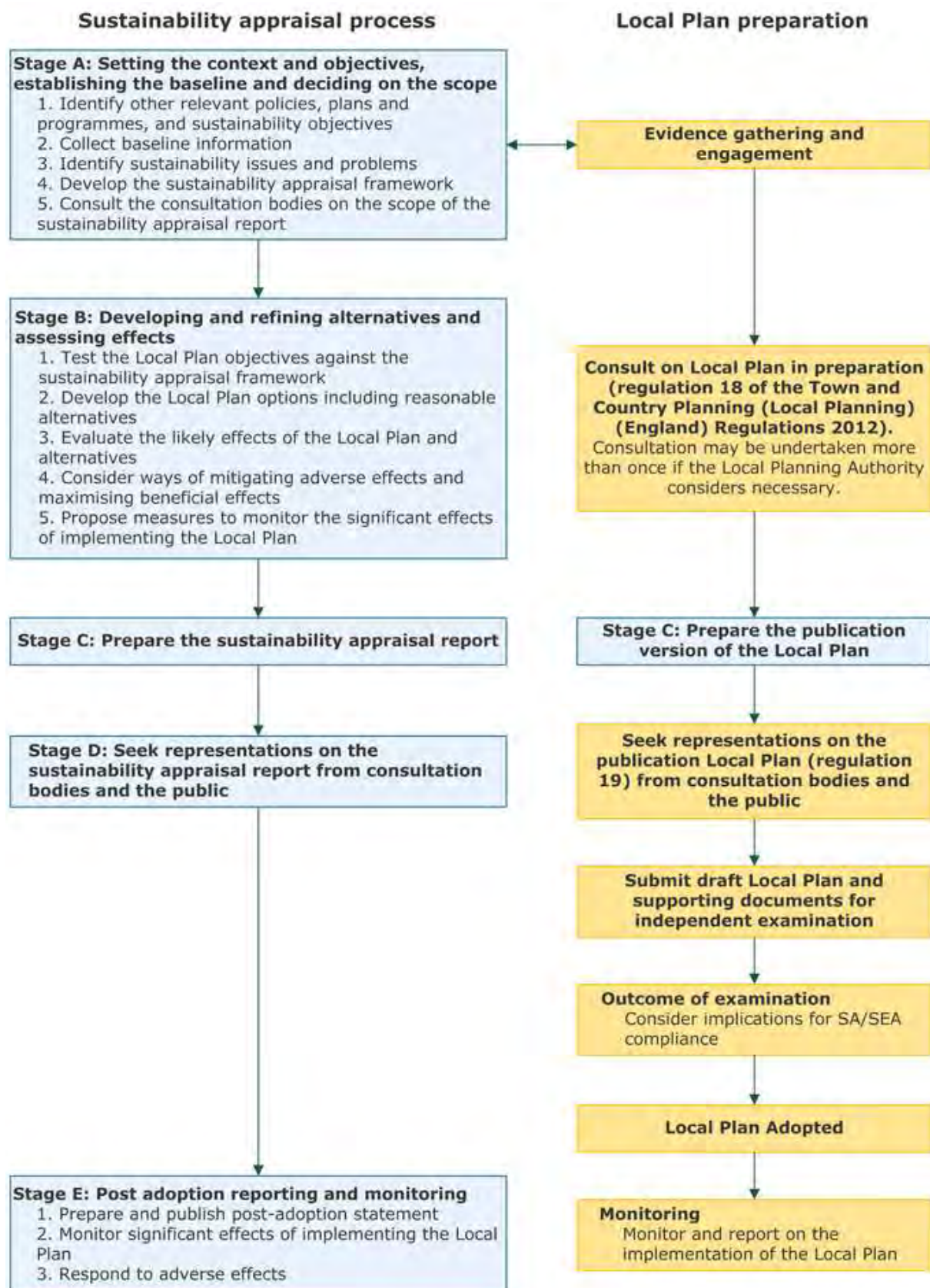


Table 2: SEA Regulations Requirements Checklist (Source: PPG)

Strategic Environmental Assessment Regulations requirements checklist	Plan-making stage	Where met?
<p>Preparation of environmental report (regulation 12)</p> <p>Preparation of an environmental report that identifies describes and evaluates the likely significant effects on the environment of implementing the plan or programme and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme (regulation 12(2)).</p> <p>The report shall include such of the information referred to in Schedule 2 as may reasonably be required, taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in the process to avoid duplication of the assessment (regulation 12(3)). Information may be provided by reference to relevant information obtained at other levels of decision-making or through other EU legislation (regulation 12(4)).</p> <p>When deciding on the scope and level of detail of information to be included in the environmental report the consultation bodies should be consulted.</p>	<p>For Local Plans, see Figure 1.</p>	<p>Rother Local Plan „Development and Site Allocations Plan“ Sustainability Appraisal Scoping Report (August 2016). Updated in this report – Chapters 3 and Appendix 2.</p>
<p>The information referred to in Schedule 2 is:</p> <p>a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.</p>	<p>For Local Plans, see Figure 1.</p>	<p>Rother Local Plan „Development and Site Allocations Plan“ Sustainability Appraisal Scoping Report (August 2016). Updated in this</p>



		report – Chapters 2, and Appendix 1.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	For Local Plans, see Figure 1.	Rother Local Plan „Development and Site Allocations Plan“ Sustainability Appraisal Scoping Report (August 2016). Updated in this report – Chapters 3 and Appendix 2.
c) The environment characteristics of areas likely to be significantly affected.	For Local Plans, see Figure 1.	Rother Local Plan „Development and Site Allocations Plan“ Sustainability Appraisal Scoping Report (August 2016). Updated in this report – Chapters 3 and Appendix 2
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives <a href="#">2009/147/EC (Conservation of Wild Birds)</a> and <a href="#">92/43/EEC (Habitats Directive)</a> .	For Local Plans, see Figure 1.	Rother Local Plan „Development and Site Allocations Plan“ Sustainability Appraisal Scoping Report (August 2016). Updated in this report – Chapters 2, and Appendix 1.
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	For Local Plans, see Figure 1.	Rother Local Plan „Development and Site Allocations Plan“ Sustainability Appraisal Scoping Report (August 2016). Updated in this

		report – Chapters 3 and Appendix 2
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscapes and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.	For Local Plans, see Figure 1.	Chapter 5. Appendices 3 and 4.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	For Local Plans, see Figure 1.	Chapter 5. Appendices 3 and 4.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	For Local Plans, see Figure 1.	Chapters 4 and 5. Appendices 3 and 4.
i) A description of measures envisaged concerning monitoring in accordance with regulation 17.	For Local Plans, see Figure 1.	Chapter 6.
j) A non-technical summary of the information provided under the above headings.	For Local Plans, see Figure 1.	Non-Technical Summary.
Consultation procedures (regulation 13) As soon as reasonably practicable after their preparation, the draft plan or programme and environmental report shall be sent to the consultation bodies and brought to the attention of the public, who should be invited to express their opinion. The period within which opinions must be sent must be of such length as will ensure an effective opportunity to express their opinion.	For Local Plans, see Figure 1.	Alongside DaSA „Options and Preferred Options“ consultation.
Information as to adoption of plan or	For Local Plans,	Post DASA

<p>programme (regulation 16)</p> <p>As soon as reasonably practicable after the plan or programme is adopted, the consultation bodies, the public and the Secretary of State (who will inform any other EU Member States consulted) shall be informed and the following made available:</p> <ul style="list-style-type: none"> <li>• the plan or programme adopted</li> <li>• the environmental report</li> <li>• a statement summarising: <ul style="list-style-type: none"> <li>(a) how environmental considerations have been integrated into the plan or programme;</li> <li>(b) how the environmental report has been taken into account;</li> <li>(c) how opinions expressed in response to: <ul style="list-style-type: none"> <li>(i) the invitation referred to in regulation 13(2)(d);</li> <li>(ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;</li> </ul> </li> <li>(d) how the results of any consultations entered into under regulation 14(4) have been taken into account;</li> <li>(e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</li> <li>(f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme. (regulation 16)</li> </ul> </li> </ul>	<p>see Figure 1.</p>	<p>Adoption.</p>
<p>Monitoring of implementation of plans or programmes (regulation 17)</p> <p>Monitoring of significant environmental effects of the plan"s or programme"s implementation with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action (regulation 17 (1)). Monitoring arrangements may comprise or include arrangements established for other purposes (regulation 17 (2)).</p>	<p>For Local Plans, see Figure 1.</p>	<p>On-going</p>

## **2. SUSTAINABILITY BACKGROUND**

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

#### **2.1.1 Schedule 2 of the SEA Regulations requires:**

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

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

#### **2.1.3 Links with other plans and programmes have been continually reviewed and updated throughout the sustainability appraisal process as applied to the Rother District Local Plan 2011-2028, including the various iterations of the Core Strategy Sustainability Appraisal. Most recently they were outlined in the DASA SA Scoping Report (August 2016) as part of Task A1. Therefore this DASA Issues & Preferred Options SA should be read alongside, and complementary to, the above iterations. Appendix 1 of the current document is therefore a further update and review.**

#### **2.1.4 The following sections 2.2 and 2.3 comprises a further re-cap of the main international and national policies, plans and programmes.**

#### **2.1.5 Section 2.4 updates „Key Local Plans, Policies and Programmes“ that have been published subsequent to the most recent Core Strategy SA iteration (July 2013).**

#### **2.1.6 Section 2.5 „Implications of New and/or Altered Strategies, Plans, Policies, Programmes and Sustainability Objectives“ considers in more detail updates regarding key policies and programmes that had been published subsequent to the most recent Core Strategy SA iteration (July 2013).**

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

- 2.2.1 At the international level, Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the „SEA Directive“) and Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the „Habitats Directive“) are particularly significant as they require Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) to be undertaken in relation to the emerging plan. These processes should be undertaken iteratively and integrated into the production of the plan in order to ensure that any potential negative environmental effects (including on European-level nature conservation designations) are identified and can be mitigated.
- 2.2.2 There are a wide range of other EU Directives relating to issues such as water quality, waste and air quality, most of which have been transposed into UK law through national-level policy; however the international directives have been included in Appendix 1 for completeness.

## **2.3 Key National Plans, Policies and Programmes**

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

### The National Planning Policy Framework

- 2.3.2 The NPPF replaced the suite of Planning Policy Statements (PPSs) and Planning Policy Guidance (PPGs). The Local Plan must be consistent with the requirements of the NPPF. The NPPF sets out information about the purposes of local plan-making, stating that:

*“Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies set out in this Framework, including the presumption in favour of sustainable development.”*

- 2.3.3 The NPPF also requires Local Plans to be „aspirational but realistic“. This means that opportunities for appropriate development should be identified in order to achieve net gains in terms of sustainable social, environmental and economic development; however, significant adverse impacts in any of those areas should not be allowed to occur.

2.3.4 The NPPF requires local planning authorities to set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:

- the homes and jobs needed in the area;
- the provision of retail, leisure and other commercial development;
- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- the provision of health, security, community and cultural infrastructure and other local facilities; and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

2.3.5 In addition, Local Plans should:

- plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of the NPPF;
- be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;
- be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;
- indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;
- allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
- identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;
- identify land where development would be inappropriate, for instance because of its environmental or historic significance; and
- contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.

2.3.6 A separate „Planning policy for traveller sites“ was first published in 2012 and updated in 2015 and should be read in conjunction with the NPPF.

#### The Planning Practice Guidance (PPG)

2.3.7 The Planning Practice Guidance (PPG) was published two years after the NPPF in March 2014. Together, the NPPF and PPG set out what the Government expects of local authorities. The overall aim is to ensure the

planning system allows land to be used for new homes and jobs, while protecting valuable natural and historic environments.

- 2.3.8 The PPG adds further context to the National Planning Policy Framework (“NPPF”) and it is intended that the two documents should be read together. The PPG replaces over 7,000 pages of planning guidance that was previously published in separate documents and includes 42 pieces of guidance on key topics.
- 2.3.9 Plan makers must have regard to national policies and advice contained in the guidance when developing their plans. Therefore local plans may reflect what the guidance says about certain topics. The guidance is also a „material consideration“ when taking decisions on planning applications. This means that if a local policy is deemed out of date, local authorities may be directed by the national guidance’s requirements.

#### Further Consideration of the Implications of Key New and/or Altered National Strategies, Plans, Policies, Programmes and Sustainability Objectives

- 2.3.10 There have been a number of plans, policies and programmes in the last three years that potentially impact upon the Sustainability Appraisal and warrant a closer examination. In most cases these transcend the hierarchical sub-division of national, sub-regional, local. In other words, in most cases they have involved a national decision that will nonetheless have local implications.

#### Affordable Housing Provision

- 2.3.11 On 28th November 2014, Central Government amended the national Planning Practice Guidance (PPG) to detail specific circumstances when affordable housing and tariff-style planning obligations should not be sought. It indicates that sites of 5 or less cannot seek affordable housing (either on-site provision or financial contributions). In Areas of Outstanding Natural Beauty (AONBs) Local Authorities can seek financial contributions towards affordable housing of sites of 6-10 dwellings. On sites of 11 or more, on-site provision can be sought. It was agreed by Rother District Council Cabinet that, pending further work, the Council would give greater weight to the PPG than Core Strategy Policy LHN2 in relation to the thresholds at which affordable housing is triggered in the determination of planning applications. This interim approach is being reviewed via the Development and Site Allocations Local Plan and options are considered in the SA of Affordable Housing policy options.

## Housing and Planning Act 2016

- 2.3.12 The Act of Parliament introduces legislation to allow the sale of higher value local authority homes, introduce starter homes and "Pay to Stay" and other measures intended to promote home ownership and boost levels of house-building.

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

- 2.4.1 Since publication of the „Sustainability Appraisal of the Council"s proposed revised modifications (July 2013)", a number of relevant local plans policies or programmes have been produced that are of relevance to the SA process. This section updates the position post-July 2013.
- 2.4.2 The first iteration of the DaSA will be the „Options and Preferred Options" – which this SA supports. It is supported by the following background papers:
- Strategic Gaps
  - North Bexhill
  - GI Addendum
  - Employment Sites Review
  - Water Efficiency
  - Sites Methodology Paper
  - Renewable Energy

## Local Extensions of International (Natura 2000) Sites

- 2.4.3 There have been recent extensions, and proposed extensions, to the international sites network in Rother, as illustrated on Map 18 in the Appendix 2 Baseline information.
- 2.4.4 The Pevensey Levels SAC was designated in early 2016, being upgraded from proposed SAC status, and reflecting the boundary of the pre-existing Pevensey Levels Ramsar.
- 2.4.5 The Dungeness, Romney Marsh and Rye Bay SPA was expanded in March 2016 so as to incorporate and replace the 'Dungeness to Pett Level SPA'.
- 2.4.6 The Dungeness, Romney Marsh and Rye Bay Ramsar site was recently implemented and upgraded from proposed Ramsar status.
- 2.4.7 In addition, a further marine extension to the SPA is being consulted upon, with the consultation due to close in January 2017. The marine extension is



recommended for breeding Little, Common and Sandwich Terns and extends virtually the full length of Rother District's coastline, with the only exclusion being the marine area opposite Norman's Bay and the south-west corner of the District. There is a plan of the proposed SPA in Appendix 2 (Map 19).

- 2.4.8 The implications of these designations, both recently extended and pre-existing, have been considered as part of the Habitats Regulations Assessment process.

#### Habitats Regulations Assessment

- 2.4.9 A Habitats Regulations Assessment (HRA) was undertaken for the Core Strategy to consider the potential impacts of the development strategy on international sites of nature conservation importance - being primarily the Dungeness Complex of sites that straddle the Rother/Shepway boundary in the east of the District and the Pevensey Levels, straddling the Rother/Wealden boundary in the south-west of the District. That HRA found that its policies for the quantum and distribution of housing, (specific to individual settlement level) and its core policies would be acceptable in terms of their impacts, subject to certain provisos. In particular, it sought:
- the production of a suitable „Sustainable Access Strategy“ for the Dungeness complex of international nature conservation sites, and
  - the provision of sustainable drainage systems (SUDs) within the Pevensey Levels hydrological catchment.
- 2.4.10 In relation to the Dungeness Complex, a usage survey has been completed and a *Sustainable Access Strategy* is being prepared in partnership with Shepway District Council, Natural England and other stakeholders.
- 2.4.11 A further HRA „Screening Report“ has been prepared for this Development and Site Allocations Plan (DaSA) Local Plan. This concludes that it is not considered likely to result in significant adverse effects on the integrity of European sites or associated sensitive areas, either in isolation or in combination (including with other plans and policies). This is subject to the requirement for continued conformity with Core Strategy policies. By implication, should policies emerge that deviate significantly from the Core Strategy, then the Plan may need to be screened in and re-assessed once more, as well as possibly subject to more detailed appropriate assessment.
- 2.4.12 A notable further recommendation of the DASA HRA Screening Report, was that a minimum of two forms of appropriate SuDS should be incorporated alongside development within the Pevensey Levels hydrological catchment area.

### Camber Supplementary Planning Document (SPD)

- 2.4.13 This SPD for Camber Village (2014) was produced by Allies and Morrison Urban Practitioners on behalf of the Council. It established an overarching vision for the village and provides a guide for future development in the area. It was supported by its own Habitats Regulations Assessment and Sustainability Appraisal process.

### Community Infrastructure Levy (CIL)

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

### Infrastructure Delivery Plan (IDP)

- 2.4.16 The Infrastructure Delivery Plan (IDP) is part of the evidence base informing the preparation of spatial policy in the Rother Core Strategy. While the Core Strategy maps the best approach to delivering the vision set out in the Sustainable Community Strategy for Rother, the IDP identifies the infrastructure needed to support development proposed by the Local Plan and assists with project managing the planning, programming and funding of work required to ensure that infrastructure is provided in a timely manner.

### Proposed High Speed 1 Extension

- 2.4.17 The proposed High Speed 1 extension would connect high speed rail services from Ashford via Hastings to Bexhill. It will enable more frequent services and shorter travel times to London via HS1 and to Brighton which will support regeneration of Hastings and Bexhill and improve access to towns and villages along the route. On 25 February 2016 a high-level working group was established to secure HS1 services for Bexhill, Hastings and Rye, via Ashford International.

- 2.4.18 At the second Hastings Rail Summit on 30 January 2015 Network Rail and local stakeholders reported that feasibility studies and economic reviews of the project to bring HS1 Javelin services to Bexhill via Hastings and Rye soon after 2019 had been completed in draft and were then expected to be published in April 2015. Rail Minister Claire Perry reaffirmed the commitment to develop the project.
- 2.4.19 In the event of implementation, the main sustainability implications would be economic, in terms of promoting regeneration of the local area; as well as environmental, in terms of promoting a sustainable alternative to car travel – making the journey the speedier, as well as the more sustainable, option.

### 3. SUSTAINABILITY ISSUES

- 3.0.1 [Regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004](#) sets out the formal requirements of an „environmental report“, which should form an integral part of the sustainability appraisal report and is a core output of any strategic environmental assessment.
- 3.0.2 The PPG confirms it is the role of the Scoping Report to „set out the context, objectives and approach of the assessment; and identify relevant environmental, economic and social issues and objectives“.
- 3.0.3 The identification of sustainability issues in Rother will be an on-going process rather than a single „event“. Views and information on the key issues for the District will be further informed through the Local Plan process.
- 3.0.4 At this point in the process, sustainability issues have been identified based upon:
- Key messages from the review of relevant Policies, Plans and Sustainability Objectives
  - The baseline information, as set out in Appendix 2.
  - Knowledge gained through the preparation of the Rother District Local Plan
- 3.0.5 The identified issues reflect in the objectives set out in the Sustainability Appraisal Framework in section 4.1.
- 3.0.6 Whilst the objectives have been categorised as „Economic“, „Social“ or „Environmental“, it should be noted that this sub-division is not necessarily a clear distinction - to some extent, all objectives have an environmental, social and economic implication. However, for the purposes of the assessment, the objectives have been apportioned to the category where effects are considered most likely to be significant.

### 3.1 Environment

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

- 3.1.1 The East Sussex Joint Waste Strategy 2014 to 2025 reveals that since 2006, the County has doubled the amount of waste that is reused, recycled and composted and reduced waste sent to landfill by over 90%. By 2012/13 the County recycled, composted, reused or recovered energy from 94% of household waste and only 5.5% went to landfill (5.6% in Rother). These figures are borne out in the Baseline information in Appendix 2 (SA Objective 16). Pebsham Landfill Site between Bexhill and St Leonards was the last active site in the County. The last section of this site closed in November 2013 and is currently undergoing restoration as part of proposals to incorporate the site into the Combe Valley Countryside Park. There are no plans for any future landfill or land raise sites in East Sussex. Small quantities of waste are currently sent to landfill in West Sussex. The Waste Authority is working with neighbouring authorities and contractors to reduce this further still.
- 3.1.2 Rother recycles 18.5% of total household waste, below the East Sussex level of 20%. However, Rother composts 26.5% of total household waste, well above the East Sussex figure of 18.6%.
- 3.1.3 Despite a lot of good progress, the average East Sussex household still creates almost a tonne of waste and recycling each year, that's some 238,000 tonnes of waste in total. The cost of dealing with this is around £155 per household per year. On top of that, the average UK household throws away £480 worth of food and drink annually that could have been consumed. Businesses also spend some 4% of their turnover on dealing with their waste. The recycling targets set out in the Joint Waste Strategy are 50% by 2020 and 60% by 2025.
- 3.1.4 The household waste per head (kg) is low in Rother (385kg per annum) when compared to the East Sussex figure of 448kg per annum. However, although it has fluctuated, the Rother figure has risen slightly over the last 5 years, whilst the East Sussex figure has exhibited a continual downward trend.

### Landscape Quality (SAF Objective 15)

- 3.1.5 The High Weald AONB Management Plan, County Landscape Assessments and the Council's Green Infrastructure Study all highlight the key issue of ensuring the District's high landscape quality is maintained as well as enabling and encouraging people to value and enjoy the natural environment as a whole.
- 3.1.6 Over 83% of Rother District falls within the High Weald Area of Outstanding Natural Beauty reflecting its national landscape importance. The High Weald AONB Management Plan identifies the key characteristics of the designation area (see Map 27 in Appendix 2) as well as objectives to maintain and enhance the area.
- 3.1.7 There are three national landscape character areas in the District (see Map 24). The District can be sub-divided further into local landscape character areas (see Map 25) which are largely defined by river valleys. The County Council's Landscape Character Assessments identify problems and pressures for each character area, formulate a vision and provide landscape action priorities.

### Biodiversity (SAF Objective 14)

- 3.1.8 Biodiversity is, in short, the variety of life. The Biodiversity Action Plan for Sussex notes that the County has a wide range of habitats including flower-rich meadows, ancient wooded valleys, coastal sand dunes and shingle. Many of these habitats have declined in area and quality over the past 100 years. In Sussex, 508 Biodiversity Action Plan priority species have been recorded (that's more than 44% of the UK total). Species are listed as a result of being globally threatened and/or in rapid decline in the UK.
- 3.1.9 Within Rother, some 5% of the land area is classed as sites of international significance for nature conservation. These are at Pevensy Levels (Ramsar site and Special Area of Conservation) and in the Dungeness, Rye and Pett Level area (various sections designated Special Protection Area, Special Area of Conservation and Ramsar), as visible on Maps 17 and 18 in Appendix 2. In addition, a proposed marine extension to the Dungeness, Romney Marsh and Rye Bay Special Protection Area (pSPA) will extend across most of the marine area fronting Rother District. There are also nationally important Sites of Special Scientific Interest, principally around wetland areas near the coast and a number of more locally significant Sites of Nature Conservation Importance. A key issue in national and local policy is how overall biodiversity can be protected and enhanced.

- 3.1.10 Some 16% of the District is covered by ancient woodland (see Map 22), with another 8% coastal and floodplain grazing marsh. There are approximately 20 other BAP Priority or Special to Sussex habitats (see Maps 20 and 21), which are individually less significant in coverage. Collectively, BAP Priority habitats are widespread across the District and their preservation and enhancement is key.

#### Built Environment (SAF Objective 15)

- 3.1.11 Rother benefits from a high quality built environment. The District has over 2,100 Listed Buildings, 10 Conservation Areas, 53 Scheduled Monuments and 7 registered parks and gardens.
- 3.1.12 Key considerations are, how such historic quality can be conserved and enhanced, and how good quality design including the efficient use of resources, can be incorporated into the design of future buildings and public spaces. Eight listed buildings and seven scheduled monuments in Rother are classed by Historic England as being „at risk“.

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

- 3.1.13 As outlined in the Environment Strategy for East Sussex, climate change is likely to lead to more extreme weather, such as more heat waves, storms and flash flooding, with significant implications for the costs of maintaining our infrastructure. Flooding in Lewes, Uckfield and Robertsbridge in October 2000 caused around £130 million of damage. The 10 day heat wave in August 2003 caused an estimated 30 premature deaths in East Sussex. Areas at risk of flooding in Rother are focussed upon the coastal marshlands and river valleys.
- 3.1.14 In Rother each person creates an average of 6.6 tonnes of CO<sub>2</sub> per year, including the emissions created from the goods and services we buy. This is above the East Sussex average of 5.4 tonnes, but below the national average of 7 tonnes. Our sustainable world fair share will be only two tonnes per person by 2050.
- 3.1.15 Further key issues stem from development on floodplains and how this affects our ability to adapt to the predicted impacts of climate change, as well as the need to reduce the use of natural resources, energy consumption and carbon emissions, improve energy efficiency and source more of the county's energy from our local renewable sources.

### Water Quality (SAF Objective 13)

- 3.1.16 Domestic water usage is generally high in the South East region compared to national usage. The Environment Agency (EA) has highlighted the entire area of the South East as „water-stressed“ - Both Southern Water and South East Water are classified as being a water stress area in all scenarios.
- 3.1.17 Rivers in Rother District require biological and morphological work to enhance them and aquatic pollution, particularly rural drainage pollution, needs to be addressed so that the chemical quality of controlled waters in Rother improves.
- 3.1.18 As part of the statutory consultation on the SA Scoping Report, the Environment Agency made the following comment (October 2014):
- “There are 24 water bodies within Rother District. Of these, based on 2013 Cycle 2 classifications, 8 are at good status, 12 is at moderate status and 4 are at poor status. As moderate and poor status constitutes a failure in the Water Framework Directive (WFD), only 33% of the water bodies in Rother District pass WFD criteria; two thirds fail WFD criteria”.*
- 3.1.19 The European Union’s Water Framework Directive (WFD) (2000/60/EC) came into force in December 2000 and became part of UK law in December 2003. The WFD requires the water-bodies (both surface and groundwater) of all European Union member states to achieve „good ecological status“ or „good ecological potential“ by 2027. The Directive also requires that no water-bodies experience deterioration in status. Good status means good ecological status and good chemical status, as defined by a number of quantifiable quality elements.
- 3.1.20 Regarding bathing water, recent results show Bexhill classified as „Good“ in 2015, having risen from sufficient in 2013. Winchelsea and Camber have both been classed as „good“ for four continuous years. Norman’s Bay is classed as „excellent“, having previously been just „good“ in 2012.

### Air Quality (SAF Objective 10)

- 3.1.21 The wider environmental costs of air pollution, greenhouse gas emissions and noise from UK transport are estimated to be between £8.7bn and £19.3bn per year.



3.1.22 The East Sussex Environment Strategy noted that:

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

3.1.23 In their consultation comments, Natural England highlight that traffic growth on roads within 200m of sensitive designated habitats has the potential for development to impact on the natural environment (in particular designated habitats).

3.1.24 An Air Quality Management Area (AQMA) does not need to be designated in Rother at present. However, the review and assessment process for air quality will continue.

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

3.1.25 East Sussex has proportionally less Grade 1 and 2 classified agricultural land. This resource, along with Grade 3a, should be protected as this constitutes the best and most versatile agricultural land. In Rother, the majority of agricultural land is grade 3-4, although there is some higher quality grade 2 across the East Guldeford levels.

3.1.26 Largely because there is no recent industrial legacy, Rother District does not have a high stock of surplus brownfield land, as evidenced by the comparative lack of brownfield opportunities identified in the Council's Strategic Housing Land Availability Assessment (SHLAA) process.

3.1.27 Parts of rural Rother lack a mains gas connection. This can be a contributory factor towards fuel poverty, but can mean renewable energy options are a more attractive option.

## **3.2 Social**

### Community Safety (SAF Objective 3)

3.2.1 Although Rother has generally low rates of criminal offences compared with the South East and England & Wales, the Ipsos Mori, Place Survey (see Appendix 2 baseline information) shows a comparatively high fear of crime, particularly after dark. However, the same survey showed very high levels of satisfaction with Rother as a place to live.

- 3.2.2 IMD Crime deprivation mapping indicates particular issues in the far east of the District around Camber, and to a lesser extent in central Bexhill.

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

- 3.2.3 In respect of child poverty specifically, parts of Bexhill and an area of Rye fall within the top 20% most deprived areas in the country. As of 2014, 18.9% of Rother's children were living in poverty which is a high figure compared to East Sussex and the wider South-east region.

Culture & Leisure (SAF Objective 8)

- 3.2.4 Cultural and leisure opportunities can have a role in improving the quality of people's lives by promoting healthy lifestyles, supporting community cohesion, reducing crime and anti-social behaviour, supporting the economy and regeneration and contributing to environmental protection. The Hastings & Rother Leisure Facilities Strategy mapped access to leisure facilities, which not surprisingly showed Bexhill to benefit from better access in comparison to rural areas of the District.
- 3.2.5 Leisure centre visits have increased in Rother, as have visitors to the De La Warr Pavilion in Bexhill.
- 3.2.6 However, levels of participation in sport are low in Rother compared to other areas, possibly as a consequence of having a comparatively older population. Rother also exhibits a low proportion of the population who are within 20 minutes travel time of sports facilities, which is another possible factor. There are also some quantity and access deficits of open space in the District, notably of larger green-spaces (100ha +) particularly around Bexhill.

Health (SAF Objective 2)

- 3.2.7 Rother has a high proportion of people with long-term health problems or disabilities (23.9%), compared to England & Wales (17.9%) and the South-East region (15.7%). Long-term health and disabilities problems are particularly apparent in Central Bexhill and Sidley. Living Environment issues, which may be a factor in poor health, are also apparent in Central Bexhill, as well as the east of the District and the remote rural west of the District.

3.2.8 The Community Plan recognises that an overall improvement in the health of Rother's residents and a reduction in health inequalities are important objectives. The Community Strategy for East Sussex highlights the importance of supporting older people to live independently for as long as possible.

3.2.9 The Community Strategy for East Sussex (2012 Update) identified the following as a strategic priority by 2026:

*„Reduced health and care inequalities within and between communities and an improvement in overall health and wellbeing“*

Housing (SAF Objective 1)

3.2.10 Over recent years increases in average household incomes in Rother have not kept pace with house price rises, with the consequence that houses are becoming less and less affordable for local people, particularly in rural areas.

3.2.11 The affordability ratio is now almost 13 in Rother, compared to just over 9 in England. Rother has 1,350 households on the housing register.

3.2.12 Without an adopted DaSA in place, there would be serious consequences for the rate of housing delivery, and in turn the availability and affordability of housing for residents.

Transport & Accessibility (SAF Objectives 7, 10)

3.2.13 The Community Strategy for East Sussex (2012 Update) identified the following as a strategic priority by 2026:

*„To improve sustainable transport choices and access to services and facilities within and between communities in the county.“*

3.2.14 Access to services in rural parts of the District is particularly constrained whilst public transport services are generally limited. The 2011 Census revealed that more than 64% of journeys to work in Rother are by car whereas less than 9% are by bus or train. The District shows a greater degree of car dependency in comparison to national, regional and county-wide figures.

3.2.15 Local Transport Plan 3 identified several key priorities for Battle, Rye and Rural, including improvements to transport and improving access to key services in the area. Similarly at the county level it is recognised that access

to services is constrained, in part, by the overall lack of broadband facilities across East Sussex.

#### Deprivation (SAF Objective 4)

- 3.2.16 The 2015 Indices of Multiple Deprivation rank Rother as the 148<sup>th</sup> most deprived local authority area out of the 354 in England. This had fallen from 132<sup>nd</sup> in 2010, thereby showing an improving situation. However, there are pockets of more severe deprivation in parts of Bexhill and in the eastern wards of the District.
- 3.2.17 Almost 9% of Rother households are classed as being in fuel poverty, which is low compared to England & Wales, but high compared to the wider county and region.

### **3.3 Economic**

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

- 3.3.1 Educational attainment at GCSE level in Rother is relatively low, with 56% achieving 5+ GCSEs compared to 58% for East Sussex. Furthermore, a high proportion of residents have no qualifications and a low proportion have the highest level of qualifications, although this may be at least partially age related. Education skills and training deprivation is focused in Bexhill and the east of the District

#### Jobs (SAF Objective 6)

- 3.3.2 Unemployment rates, as well as long-term unemployment and proportions who have never worked, are all higher in Rother compared to East Sussex and in South East England. Employment deprivation is not evenly spread in the District, but is particularly focused in Bexhill and on the east of the District
- 3.3.3 The Employment Strategy and Land Review identifies a need for some 100,000sqm of employment floor-space for the District and this is reflected in Core Strategy policy. The Community Strategy for East Sussex also identified that rural employment opportunities need to be strengthened to help ensure a sustainable future for local rural communities.

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

3.3.4 East Sussex exhibits generally low wage rates, significant levels of employment in lower paid sectors and a county GDP which is less than two thirds of the national average. Firms in Rother are generally quite small compared to the wider County and region, although business survival rates are quite high compared to county and national figures. Approximately 13% of businesses across the High Weald are classed as „land-based“ (compared to 3% nationally).

3.3.5 The relative peripherality of the District, compounded by constrained strategic transport links, serves to affect Rother's economic fortunes. „Securing economic improvement“ has been identified as one of the main strategic development issues in Rother's Core Strategy, which states:

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

3.3.6 The Community Strategy for East Sussex (2012 Update) identified the following as a strategic priority by 2026:  
*„To narrow the gap within and between communities in the county, and between the county and the region, in order to develop a thriving, diverse and sustainable economy where everyone can prosper.*

### Other „Economic“ Objectives

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

## **4. APPRAISAL METHODOLOGY**

### **4.1 The SA Framework**

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

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

Table 3: SA Framework for Development and Site Allocations Plan

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



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

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

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

<b>11</b>	<b>SA Objective:</b> Reduce emissions of Greenhouse gases
<b>SEA Directive topics: Climatic Factors, Material Assets</b>	
<b>Decision-Aiding Questions</b>	<b>Indicators</b>
<p>Does the option/policy:</p> <ul style="list-style-type: none"> <li>• Reduce emissions through reduced travel, energy consumption.</li> <li>• Promote renewable energy generation.</li> <li>• Promote community involvement, understanding &amp; action on climate change.</li> <li>• Help reduce greenhouse gas emissions through reducing car travel.</li> <li>• Have potentially negative air quality impact upon the natural environment by increasing traffic on roads (in particular within 200m of sensitive designated habitats).</li> <li>• Have scope and potential to create or enhance walking and cycling routes, both on-site and off-site, to provide alternatives to car travel</li> <li>• Promote reduced energy use in new development (waste management and reduce energy demand from non-renewable resources).</li> <li>• Have potential for energy generation from renewable resources, including micro-generation as part of the energy requirements of new development.</li> <li>• Have potential to maximise passive solar gain.</li> <li>• Net Loss / Gain of Trees.</li> </ul>	<ul style="list-style-type: none"> <li>• Emissions of greenhouse gases</li> <li>• Consumption of gas and electricity</li> <li>• Traffic levels on key routes</li> </ul>
<b>12</b>	<b>SA Objective:</b> Minimise the risk of flooding and resulting detriment to people and property
<b>SEA Directive topics: Climatic Factors, Material Assets, Water, Human Health</b>	
<b>Decision-Aiding Questions</b>	<b>Indicators</b>
<p>Does the option/policy:</p> <ul style="list-style-type: none"> <li>• Reduce the proportion of properties at risk of flooding in the District</li> <li>• Avoid locations within flood zones, including EA Flood zones, EA defined areas of surface water risk and Local Surface Water Management Plans/SFRA identified issues of localised flooding.</li> <li>• Ensure that appropriate flood risk protection measures are in place to protect well-being.</li> <li>• Avoid exacerbating flood risk off-site by increasing run-off</li> <li>• Provide scope for, and promotion /adoption of SuDS</li> </ul>	<ul style="list-style-type: none"> <li>• Properties at risk from flooding</li> <li>• Planning permissions granted contrary to EA advice on flood defence grounds</li> </ul>
<b>13</b>	<b>SA Objective:</b> Maintain, improve and manage water resources in a sustainable way
<b>SEA Directive topics: Water, Human Health, Material Assets, Climatic Factors</b>	
<b>Decision-Aiding Questions</b>	<b>Indicators</b>
<p>Does the option/policy:</p> <ul style="list-style-type: none"> <li>• Protect &amp; improve water quality (groundwater and surface water)</li> <li>• Require the use of water efficiency measures</li> <li>• Minimise the risk of pollution to water sources</li> <li>• Avoid locations within groundwater source protection zones/aquifer.</li> <li>• Avoid risk of pollution run-off into adjacent or nearby river network (including ordinary watercourses)</li> <li>• For locations within the Pevensey Levels hydrological catchment: Recognise and appropriately respond to issues identified in the HRA, regarding both run-off and the promotion of water efficiency measures.</li> </ul>	<ul style="list-style-type: none"> <li>• Water consumption per household</li> <li>• Quality of river water</li> <li>• Rivers of High or Good chemical and biological water quality (passing Water Framework Directive criteria)</li> <li>• Bathing quality at beaches</li> </ul>

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

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

## 4.2 Compatibility of SA Objectives

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

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

- 4.2.6 A potential negative impact with „*9. Improve efficiency in land use and encourage the prudent use of natural resources*“ is highlighted. “This is because the quantity of housing that the District needs to accommodate, combined with the relative lack of brownfield opportunities in sustainable locations, means that greenfield development is inevitable.
- 4.2.7 Residential development will inevitably result in more cars on the road, and hence a negative impact, in relation to „*10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage.*“

- 4.2.8 A potential negative impact with „15. *Protect and enhance the high quality natural and built environment*“ is also highlighted. This is because the District is 83% AONB along with numerous other environmental and heritage constraints. It seems likely that house-building will inevitably be a challenge to accommodate whilst avoiding harm to these assets. New residential development will to be directed, wherever possible, away from areas of high quality landscape character.
- 4.2.9 Compatibility with other SA objectives is questionable. In advance of a planning application, the exact layout of a site is difficult to confirm categorically in light of „3. *Reduce crime and fear of crime*“, although policy layout parameters do address such issues. Also in relation to objective 3, the nature of the rural area means it will simply not be possible to ensure all development is in close proximity of a police station.
- 4.2.10 Inevitably, residential development may be on land that is currently, was previously, or could potentially have been used for employment purposes (6. *Sustain economic growth and competitiveness and encourage innovation in higher value/lower impact activities*). Conversely, housing growth may in itself be a boost to the economy, both directly to the construction industry, and indirectly by virtue of locating close to employment centres.
- 4.2.11 Given that new dwellings will not necessarily be zero carbon, as well as new housing resulting in more vehicle movements, there will inevitably be some negative impacts with „11. *Reduce emissions of Greenhouse gases*“. Negative impacts may be partially off-set by scope to provide renewable energy and an increase walking and cycling routes, particularly if located in sustainable locations.

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

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



Table 4: Matrix of Compatibility of SA Framework Objectives

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

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

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

Reduce crime and fear of crime.

Reduce deprivation and social exclusion.

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

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

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

Encourage and facilitate increased engagement in cultural and leisure activities

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

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

Reduce emissions of Greenhouse gases.

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

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

Conserve and enhance biodiversity.

Protect and enhance the high quality natural and built environment.

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

## 4.3 Assessment Scoring

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

Table 5: Assessment Scoring – Symbols Explanation

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

## 4.4 The SA for Development Options and Policies

- 4.4.1 Appendix 3 of this SA comprises the SA assessments of „Development“ (as opposed to „Site“) Options, including preferred options/policies. This links to Part B of the DaSA „Development policies“ which considers a range of topics, essentially elaborating upon matters covered by the adopted Core Strategy.
- 4.4.2 The scope of policies follows that of the Core Strategy, to help show the „audit trail“ of their genesis.
- 4.4.3 In some cases, the key issue is whether or not a Core Strategy policy needs further elaboration, in which event, the alternatives are along the lines of „a new/more detailed policy“ or „no further policy“. Examples are „the retention of sites of social or economic value“ and „external residential areas“ (which both also have sub-options about the form of new policies), „Landscape and the High Weald AONB“, „Land Stability“, „Environmental Pollution“ and „Comprehensive Development“.

- 4.4.4 The existence of key information specific to local circumstances is typically a factor in determining whether a more detailed policy should be considered. Energy efficiency is a particular example of this, where government gives scope for an „optional standard“ if locally justified, as are national internal space standards and access standards (where discrete degrees of their application are suggested if a policy is introduced as a basis for consultation).
- 4.4.5 In other cases, the nature of a further policy is regarded as the main issue and, hence, the basis of options. This is generally related to the degree of prescription or flexibility that a policy should have, sometimes reflected in its level of detail and is the basis of options for equestrian development, garden extensions, residential extensions and annexes, shop fronts and advertising, holiday sites, existing business uses, biodiversity and green space.
- 4.4.6 Where there is information (which may relate to wider policy changes as well as local circumstances) that suggests revision to an existing policy, the existing approach and an updated approach are both assessed. This applies to affordable housing (following new national guidance), strategic gaps (following an independent review), sustainable drainage and development boundaries.
- 4.4.7 There are some topics where discrete, but not necessarily mutually exclusive, approaches can be identified and each of these is assessed. This relates particularly to new policy areas in relation to housing, notably for older people where suggested options stemming from early engagement with the relevant agencies form the basis of the consultation on the approach. Similarly, self-build and custom house-building options are practical means of delivering the likely number of plots required (which is a separate question). Renewable and low carbon energy options relate to discrete technology opportunities – wind and biomass – as well as reasonable but distinct alternative thresholds for providing an energy statement.
- 4.4.8 Further details of the selection of alternatives will be contained in the respective DaSA chapters.
- 4.4.9 Development options and policies are assessed using the following template (Table 6).

Table 6: Method for assessing development options

POLICY		POLICY 1A		POLICY 2A		POLICY 3A	
SA Objective		Score	Commentary	Score	Commentary	Score	Commentary
1	Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home.	✓					
2	Improve the health and well-being of the population and reduce inequalities in health.	✓					
3	Reduce crime and fear of crime.	✓					
4	Reduce deprivation and social exclusion.	✓					
5	Raise educational achievement levels and develop the opportunities for lifelong learning.	(+)					
6	Sustain economic growth and competitiveness and encourage innovation in higher value/lower impact activities.	✗					
7	Improve accessibility to services and facilities for all ages across the District.						
8	Encourage and facilitate increased engagement in cultural and leisure activities.						
9	Improve efficiency in land use and encourage the prudent use of natural resources.						
10	Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car.						
11	Reduce emissions of Greenhouse gases.						
12	Minimise the risk of flooding and resulting detriment to people and property.						
13	Maintain, improve and manage water resources in a sustainable way.						
14	Conserve and enhance biodiversity.						
15	Protect and enhance the high quality natural and built environment.						
16	Reduce waste generation and disposal, and achieve the sustainable management of						
Potential Mitigation							
Cumulative and Synergistic Effects							
SA Conclusion							

4.4.10 In the above example, there are three options for a policy topic area. The results of these options are drawn together in the concluding rows, with one of the options normally being the preferred policy. An explanation of the three concluding rows is as follows:

Table 7: Explanation of Development Management Policies: Concluding Section

<b>Potential Mitigation</b>	Potential to mitigate negative effects and enhance positive effects.
<b>Cumulative and Synergistic Affects</b>	Above factors may interact in a synergistic way and may increase cumulative affects either positively or negatively.
<b>SA Conclusions</b>	Derived from above factors

## **4.5 The SA for Site Options and Policies**

- 4.5.1 The site option assessments are organised by settlement, for ease of comparison purposes. They are assessed in accordance with the Table 8 below.
- 4.5.2 Appendix 4 of this SA comprises the SA assessments of *Sites Options*, including preferred options/policies. This links Part C of the DaSA which considers the development potential of sites to meet the development requirements of the adopted Core Strategy.
- 4.5.3 For housing and other land uses, the scope of the SA/SEA, as the consultation document itself, excludes sites within Neighbourhood Areas, unless the relevant neighbourhood plan excludes consideration of sites for those uses. Where neighbourhood plans are in progress and SEA is required, the accompanying SEA process should ensure that they consider reasonable alternatives for residential and employment land provision in those areas.
- 4.5.4 The decision as to whether the site is considered a „reasonable option“ that warrants assessment is set out in more detail in the separate DaSA background paper „Sites Methodology“. Essentially sites have been considered a „reasonable alternative“ where they comply with the basic provisions of the adopted Core Strategy, in that they reasonably relate to a settlement considered suitable for a housing allocation.
- 4.5.5 To meet the Core Strategy’s housing targets, reasonable options around towns and villages for which there is a need to identify new sites (as identified in the Core Strategy) are subject to assessment – and included in the consultation document. The sites themselves are identified either as a result of an on-going call for sites or by Council officers, as set out in the SHLAA 2013 and the Sites Methodology Background Paper. The latter also explains the basis, drawing on the Core Strategy, for not considering some sites as reasonable options, on the basis that they are not well related to settlements for which the Core Strategy identifies a need to identify housing sites. This is subject to the qualification that brownfield sites well related to other villages with development boundaries are also considered as reasonable options worthy of further consideration, provided that the planning authority has been asked to consider them as part of this process. This reflects both national and local policies.
- 4.5.6 Notwithstanding this approach to selecting reasonable alternatives for the purposes of appraising individual sites, there has also been a complementary review of development boundaries. Where consideration is given to the removal of a development boundary around a settlement with a

development boundary in the existing Local Plan but which is not already regarded as a sustainable settlement with growth potential, this is also subject to an assessment.

- 4.5.7 Virtually all sites put forward through calls for sites have been for residential development, so are assessed as an option for that use. Particular forms of residential use, notably specialist/retirement housing have been considered where the landowner has specifically indicated this as an option and Council Planning Officers are of the view there is a planning merit in the suggestion.
- 4.5.8 Specific consideration is also given to potential Gypsy and traveller sites. Alternatives are those sites in existing temporary use for that purpose, suitable sites adjacent to existing permanent sites, other sites with an accepted willing landowner and major locations for growth in Bexhill.
- 4.5.9 The identification of potential employment sites stems from the outstanding Core Strategy business floorspace requirements in the first instance. These are set out in the Employment Sites Review Background Paper. That shows that there is quantitative need to identify sites in Bexhill, Hastings Fringes and Battle, with a need for additional sites in Rye/Rye Harbour to meet the higher target. For the Rural Areas, the minimum requirement appears likely to be met through windfall developments (assuming a continuing supportive policy – see SA/SEA of employment land retention policy and subject to the impact of recent permitted development changes), but still finds that there are both potential distributional and qualitative reasons for additional provision where suitable opportunities arise.
- 4.5.10 Initial consideration is given to whether previously allocated employment sites continue to represent sensible alternatives for business use to meet the identified requirements. (It is noted that the NPPF expects existing unimplemented business site allocations to be reviewed.) This applies to sites at Bexhill, the Hastings Fringes, Rye Harbour and Marley Lane. Hence, each of these are subject to individual SA/SEA.
- 4.5.11 There are also some sites where other uses are also considered worthy of assessment. These are variously for retail use (specifically in Bexhill), for business use (as set out below), or for some form of community use, where a need has been identified through relevant studies and endorsed by the local community itself.
- 4.5.12 Where sites are being assessed it will be necessary to establish initially which use(s) a site is actually considered a reasonable option for. This decision will be informed by wider evidence of needs, taking into account the wider plan objectives; as well as the site specific context.

4.5.13 Where mixed, or alternative, uses are being considered for a site, the SA/SEA is undertaken for each of the main uses under consideration. In such cases, the assessment of separate uses is drawn together into a single final summary section entitled „*Site Commentary, Likely Significant Effects, Potential Mitigation and Conclusions*“ where the relative merits of use options can be discussed.

Table 8: Method for assessing sites options

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

4.5.12 An explanation of the two concluding rows is as follows:

Table 9: Explanation of Sites Options: Concluding Section

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

Preferred Sites: Concluding Section

4.5.13 All sites, including those which are preferred and have been developed further into policies, have been assessed as part of the assessment of options (i.e. the above method).

4.5.14 In addition, those sites that are „preferred“ and for which draft policies/policy outlines are included in the emerging DaSA are also the subject to more refined SA, as set out below.

4.5.15 This elaborates on the commentary, drawing out economic, social and environmental factors.

4.5.16 Unlike the first Stage (SA of options), this second stage SA does not merely assess the site. It assesses the more detailed policy wording. As a consequence, the score can differ (generally the score improves) relative to the SA of site options.

4.5.17 In particular, regard to the draft policy allows for mitigation measures to be more clearly identified and for their effects to be more clearly and directly factored into the assessment process.

4.5.18 The final section „cumulative effects“ is applied on a settlement, rather than site, basis. Cumulative effects are logically considered at this stage since the quantum of development are more readily identifiable.



Table 9: Method for assessing Sites Policies

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

## 5. APPRAISAL RESULTS AND OUTCOMES

- 5.0.1 Section 5 sums up the sustainability appraisal results, including summary tables, and summing up mitigation measures, synergistic and cumulative effects. Detailed appraisal results are contained in Appendices 3 and 4.
- 5.0.2 Each of the Plan policies, as well as alternative options, have been assessed against the SA Objectives in the Framework (see section 4.1).
- 5.0.3 The SA has assessed the effects of the emerging policies alongside their evolution. This has been necessary as a result of the iterative nature of the development of the plan, and policies undergoing editorial and presentational changes.

### 5.1 Assessment of Options and Policies

- 5.1.1 The detailed assessments of the development options leading to preferred policies are set out in Appendix 3 (for development or generic policies) and in Appendix 4 (for sites policies).
- 5.1.2 „Crude“ summaries of the *policy* assessments are set out in tables 20-24 below. Tables 20 and 21 show assessment results for preferred *development* policies, with Table 20 covering policies on resources management, community, housing and economy; whereas Table 21 covers policies on environment and implementation. Tables 22 and 23 show assessment results for the preferred *sites* policies. Table 22 covers Bexhill and Hastings Fringes, Table 23 covers the rural settlements. Table 24 covers other spatial policies.
- 5.1.3 It should be noted that, at this stage in the process, not all DASA policy options have yet progressed into a draft *policy*, so do not appear in the crude summary tables. Examples include affordable housing, self-build, older persons, Northeye and Renewable Energy.
- 5.1.4 Presenting the outcomes alongside each other in this way helps demonstrate overall effects, as well as cumulative and synergistic effects. It is also a useful process tool to highlight any inconsistencies.
- 5.1.5 Negative effects do not necessarily indicate a failure in the plan or its policies. As highlighted in section 4.2, there are some inevitable tensions between SA framework objectives in terms of their compatibility.

Table 20: Crude Summary Appraisal of Development Policies (Resources, Community, Housing, Economy)

Sustainability Appraisal Objective		Policy DRM 1 Water Efficiency	Policy DCO1 Sites of social or economic value	Policy DCO2 Equestrian Developments	Policy DHG1 Residential Internal Space Standards	Policy DHG2 - Accessible and Adaptable Homes	Policy DHG3 External Residential Areas	Policy DHG4 Extensions to Residential	Policy DHG5: Extensions, Alterations and Outbuildings	Policy DHG6 Residential Annexes	Policy DHG7 Boundary Treatments	Policy DHG8 Accesses and Drives	Policy DEC1 Shopfronts and Advertising	Policy DEC2 Holiday Sites	Policy DEC3 Existing Employment Sites and Premises
1	Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home.	(✓)	~	~	✓	✓	(✓)	(✓)	(✓)	(✓)	~	~	~	~	~
2	Improve the health and well-being of the population and reduce inequalities in health.	~	(✓)	~	~	✓	(✓)	~	?	(✓)	~	~	~	~	~
3	Reduce crime and fear of crime.	~	~	~		~	~	~	~	~	~	~	~	~	~
4	Reduce deprivation and social exclusion.	~	~	~	?	(✓)	~	~	?	(✓)	~	~	~	~	(✓)
5	Raise educational achievement levels and develop the opportunities for lifelong learning.	~	~	~	~	~	~	~	~	~	~	~	~	~	~
6	Sustain economic growth and competitiveness and encourage innovation in higher value/lower impact activities.	~	✓	~	~	~	~	~	~	~	~	~	?	~	✓
7	Improve accessibility to services and facilities for all ages across the District.	~	?	~	~	~	~	~	~	~	~	~	~	~	~
8	Encourage and facilitate increased engagement in cultural and leisure activities	~	✓	~	~	~	~	~	~	~	~	~	~	~	~
9	Improve efficiency in land use and encourage the prudent use of natural resources	~	~	~	~	~	(x)	?	(✓)	(✓)	~	~	~	~	(✓)
10	Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage.	~	~	~	~	~	~	~	~	?	~	(✓)	~	?	~
11	Reduce emissions of Greenhouse gases.	~	~	~	~	~	~	~	~	~	~	~	~	?	~
12	Minimise the risk of flooding and resulting detriment to people and property.	~	~	~	~	~	~	~	~	~	~	~	~		~
13	Maintain, improve and manage water resources in a sustainable way.	✓	~	~	~	~	~	~	~	~	~	~	~	~	~
14	Conserve and enhance biodiversity.	(✓)	~	~	~	~	~	?	~	~	(✓)	~	~		~
15	Protect and enhance the high quality natural and built environment.	~	?	(✓)	~	~	?	?	✓	✓	✓	~	✓	~	(✓)
16	Reduce waste generation and disposal, and achieve the sustainable management of waste.	~	~	~	~	~	(✓)	~	~	~	~	~	~	~	~

Table 21: Crude Summary Appraisal of Development Policies (Environment, Implementation)

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

Table 22: Crude Summary Appraisal of Sites and Spatial Policies (Bexhill and Hastings Fringes)

Sustainability Appraisal Objective		Policy BEX1: Land at Levetts Wood and Oaktree Farm, Sidley	Policy BEX2: Land at Preston Hall Farm, Sidley	Policy BEX3: Land at North Bexhill	Policy BEX4: Land at Former High School Site and Drills Hall, Down Road, Bexhill	Policy BEX5: Land at Gullivers Bowls Club, Knole Road, Bexhill	Policy BEX6: Land adjacent to Cemetery Lodge /276 Turkey Road, Bexhill	Policy BEX7: Land at Moleynes Mead, Fryatts Way, Bexhill	Policy BEX8: Land South of Terminus Road, Bexhill	Policy BEX9 Land off Spindlewood Drive, Bexhill	Policy BEX10: Land at Barnhorn Green, Bexhill	Policy BEX11: Land at Sidley Sports and Social Club, Bexhill	Policy BEX12 - Bexhill Town Centre	Policy BEX13 - Bexhill Primary Shopping Area	Policy BEX14 Bexhill Cultural Area	Policy BEX15: Land south east of Beeching Road, Bexhill	Policy BEX16 - Little Common and Sidley District Centres	Policy HAS1 - Land at Michael Tyler's, Woodlands Way, Hastings	Policy: HAS2 - Land east of Burgess Road, Hastings	Policy: HAS3 - Land east of A265, Ivyhouse Lane, Hastings	HAS4 Urban Fringe Management	HAS5 - Combe Valley Countryside Park
1	Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home.	~	✓	✓	(✓)	(✓)	(✓)	(✓)	(✓)	✓	(✓)	(×)	~	~	~	(×)	~	(✓)	~	~	~	~
2	Improve the health and well-being of the population and reduce inequalities in health.	✓	(✓)	✓	(✓)	(✓)	(✓)	~	~	(✓)	(✓)	✓	~	~	~	(✓)	~	(✓)	~	~	(✓)	✓
3	Reduce crime and fear of crime.	~	(✓)	(✓)	(✓)	(✓)	~	~	(✓)	(✓)	(✓)	~	~	~	~	~	~	(✓)	(✓)	(✓)	~	~
4	Reduce deprivation and social exclusion.	~	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)	~	(✓)	(✓)	(✓)	~	~	~	~	~	(✓)	(✓)	(✓)	~	~
5	Raise educational achievement levels and develop the opportunities for lifelong learning.	~	✓	?	(✓)	✓	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)	~	~	~	~	~	~	~	~	~	~
6	Sustain economic growth and competitiveness and encourage innovation in higher value/lower impact activities.	(✓)	~	(✓)	(×)	~	~	~	(×)	~	~	~	✓	✓	✓	~	✓	(×)	(✓)	(✓)	~	~
7	Improve accessibility to services and facilities for all ages across the District.	(✓)	(✓)	(✓)	✓	✓	(✓)	~	✓	(✓)	(✓)	(✓)	✓	✓	✓	✓	✓	~	~	~	~	✓
8	Encourage and facilitate increased engagement in cultural and leisure activities	~	~	(✓)	(✓)	~	~	(×)	(✓)	~	~	✓	✓	✓	✓	(✓)	✓	~	~	~	✓	✓
9	Improve efficiency in land use and encourage the prudent use of natural resources	~	~	(✓)	✓	✓	~	~	✓	(✓)	(✓)	✓	✓	✓	✓	(✓)	~	(✓)	~	~	~	~
10	Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage.	~	(✓)	~	~	~	~	~	~	~	~	~	~	~	~	(✓)	~	~	~	~	~	~
11	Reduce emissions of Greenhouse gases.	(✓)	~	~	~	~	~	~	~	(✓)	~	~	~	~	~	~	~	~	~	~	~	~
12	Minimise the risk of flooding and resulting detriment to people and property.	~	~	~	~	~	~	~	~	(✓)	(✓)	(✓)	~	~	~	(✓)	~	~	~	~	~	~
13	Maintain, improve and manage water resources in a sustainable way.	~	~	(✓)	~	~	~	~	~	~	~	(✓)	~	~	~	~	~	~	~	~	~	~
14	Conserve and enhance biodiversity.	(✓)	~	~	~	~	~	~	~	✓	(✓)	~	~	~	~	~	~	~	~	~	✓	✓
15	Protect and enhance the high quality natural and built environment.	(✓)	(✓)	(✓)	✓	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)	~	✓	(✓)	✓	~	(✓)	(✓)	✓	✓
16	Reduce waste generation and disposal, and achieve the sustainable management of waste.	(✓)	(✓)	~	(✓)	(✓)	~	~	(✓)	~	(✓)	(✓)	~	~	~	(✓)	~	~	~	~	~	~

Table 23: Crude Summary Appraisal of Sites Policies (Rural Areas)

Sustainability Appraisal Objective		Policy BEC1 Land East of Hobbs Lane, Beckley Four Oaks	Policy BEC2 Land South of Buddens Green, Beckley Four Oaks	Policy BRO1 Land West of Northiam Road A28	Policy BRO2 Land South of Rainbow Trout Pub, Northiam	Policy CAM1 Land at the Former Putting Green, Camber	Policy CAM2 Land at Central Car Park, Camber	Policy CAT1: Land to the Rear of the White Hart, Catsfield	Policy CAT2: Land on Skinners Lane, Catsfield	Policy HUR1: Land off Foundry Close to the east of Hurst Green	Policy HUR2: Caravan Tech premises, High Street, Hurst Green.	Policy IDE1 Land South of Elmsmead, Iden	Policy PEA1: Land South of Main Street, Peasmarsh	Policy NOR1: Land South of Church of England School	Policy RHA1 Land at Stonework Cottages	Policy RHA2 Harbour Road Employment Area	Policy: WES1 – Land at Westfield Down, Westfield	Policy: WES2 – Land at the former Moorhurst Care Home, Westfield	Policy: WES3 – Land off Goulds Drive, Westfield	Policy: WES4 – Land connecting Moor Lane and the A28
1	Ensure that everyone has the opportunity to live in a decent <u>sustainably constructed and affordable</u>	✓	(✓)	✓	✓	(✓)	(✓)	✓	(✓)	✓	✓	✓	✓	✓	(✓)	(x)	✓	✓	(✓)	(x)
2	Improve the health and well-being of the population and reduce inequalities in <u>health</u> .	(✓)	(✓)	✓	(✓)	(✓)	(✓)	(✓)	~	~	~	~	✓	(✓)	(✓)	~	✓	✓	(✓)	✓
3	Reduce crime and fear of crime.	~	~	~	~	~	~	~	~	~	~	~	~	~	~	~	~	(x)	~	~
4	Reduce deprivation and social exclusion.	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)	~	(✓)	(✓)	(✓)	(✓)	~	~	(✓)
5	Raise educational achievement levels and develop the opportunities for <u>lifelong learning</u> .	~	(✓)	(✓)	(✓)	(x)	(x)	(✓)	(✓)	(✓)	(✓)	(x)	~	(✓)	(x)	~	(✓)	~	~	~
6	Sustain economic growth and competitiveness and encourage <u>innovation in higher value/lower impact</u>	(x)	~	~	~	✓	✓	~	~	~	(x)	~	~	~	~	✓	~	~	~	~
7	Improve accessibility to services and facilities for all ages across the District.	~	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)	~	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)	~	(✓)	(✓)	~	(✓)
8	Encourage and facilitate increased engagement in cultural and leisure <u>activities</u>	~	(✓)	(✓)	(✓)	(✓)	(✓)	(✓)	~	(✓)	~	(✓)	(✓)	(✓)	(✓)	~	✓	(✓)	~	✓
9	Improve efficiency in land use and encourage the prudent use of natural <u>resources</u> .	✓	(x)	✓	~	(✓)	(✓)	~	(x)	~	✓	(x)	~	(x)	✓	✓	~	(✓)	(x)	~
10	Reduce road congestion and pollution levels and ensure air quality continues <u>to improve by increasing travel choice</u>	~	(✓)	(✓)	~	~	~	~	~	(x)	~	(✓)	(✓)	(✓)	~	(✓)	(✓)	✓	~	~
11	Reduce emissions of Greenhouse gases.	~	(✓)	~	~	~	~	~	~	~	(✓)	~	(✓)	~	~	(x)	(✓)	~	~	✓
12	Minimise the risk of flooding and resulting detriment to people and <u>property</u> .	(✓)	(✓)	(✓)	~	(x)	(x)	(✓)	(✓)	(✓)	(✓)	~	(✓)	~	(x)	(x)	(✓)	(✓)	(✓)	~
13	Maintain, improve and manage water resources in a sustainable way.	~	~	(✓)	~	~	~	~	~	~	~	~	(✓)	~	~	~	~	~	~	~
14	Conserve and enhance biodiversity.	~	(x)	(✓)	~	(✓)	(✓)	~	~	~	~	~	(✓)	~	~	(✓)	~	~	~	(✓)
15	Protect and enhance the high quality natural and built environment.	(✓)	(✓)	~	~	~	~	~	~	~	(✓)	~	(✓)	~	~	(✓)	?	~	~	~
16	Reduce waste generation and disposal, and achieve the sustainable <u>management of waste</u>	(x)	(x)	~	~	~	~	~	~	~	~	(x)	~	~	~	~	~	~	~	~

Table 24: Crude Summary Appraisal of Other Spatial Policies

Sustainability Appraisal Objective		Policy GYP1: Land adjacent to High Views, Loose Farm Lane, Battle	Policy BEX3: Land at North Bexhill (Gypsy and Traveller site only)	Policy GUE1 - Land at former highway depot, Guestling Green	Policy MAR1 - Land at Felon's Field, Marley Lane	Policy RVR1 - Rother Valley Railway
1	Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable	✓	✓	(✓)	~	~
2	Improve the health and well-being of the population and reduce inequalities in health.	(✓)	✓	(✓)	~	~
3	Reduce crime and fear of crime.	(x)	(✓)	(✓)	~	~
4	Reduce deprivation and social exclusion.	(✓)	(✓)	(✓)	~	~
5	Raise educational achievement levels and develop the opportunities for lifelong learning.	(✓)	~	~	~	~
6	Sustain economic growth and competitiveness and encourage innovation in higher value/lower impact	(✓)	(✓)	(✓)	✓	(✓)
7	Improve accessibility to services and facilities for all ages across the District.	(✓)	(✓)	~	(x)	(✓)
8	Encourage and facilitate increased engagement in cultural and leisure activities	(✓)	(✓)	~	~	(✓)
9	Improve efficiency in land use and encourage the prudent use of natural resources	~	~	(✓)	~	(✓)
10	Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice	(✓)	(✓)	~	(x)	~
11	Reduce emissions of Greenhouse gases.	~	~	~	?	(x)
12	Minimise the risk of flooding and resulting detriment to people and property.	~	~	~	(✓)	(✓)
13	Maintain, improve and manage water resources in a sustainable way.	(✓)	(✓)	~	~	~
14	Conserve and enhance biodiversity.	(✓)	~	~	(✓)	~
15	Protect and enhance the high quality natural and built environment.	(✓)	(✓)	~	(✓)	~
16	Reduce waste generation and disposal, and achieve the sustainable management of waste.	(✓)	~	~	~	~

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

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

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

- 5.2.2 The significant effects on this SA Objective are beneficial. The plan successfully identifies a good supply of site-specific deliverable opportunities to meet the housing requirements of the Core Strategy. These support sympathetic accommodation of housing growth in sustainable locations and appear likely to be deliverable and viable.
- 5.2.3 Policies promoting space standards (internal and external), access standards, and accessible and adaptable homes all help ensure new development is designed so as to make good quality places for people to live.
- 5.2.4 Policies making provision for proportions of affordable housing have already been established by the Core Strategy, and the DaSA allocates in accordance with these adopted policies, notwithstanding changes at a national level that are beyond local control.
- 5.2.5 There are some minor negative effects to this objective from policies relating to strategic gaps and one or two sites proposed for alternative uses rather than residential, although these effects are likely to be very minor in a wider District context.

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

- 5.2.6 Overall effects on health are positive. Positive effects stem from a number of housing policies that aim to improve the living environment, notably the policy on accessible and adaptable homes.
- 5.2.7 Environmental policies also have beneficial effects, such as policies on environmental pollution and biodiversity & green infrastructure.
- 5.2.8 Site-specific policies that lead to the provision of, or are readily accessible to, green infrastructure (with its acknowledged health benefits) are also beneficial, as are housing sites located in close proximity to medical facilities.



- 5.2.9 Provision of sufficient recreational and open space opportunities also have a beneficial effect, notably the provision of Combe valley Countryside Park (Policy HAS5) will provide a strategic scale open space and opportunity for enhanced recreation serving a wide area.

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

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

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

- 5.2.13 Most policies have been judged to have either a neutral, or a minor beneficial effect, on reducing deprivation and social exclusion. Depending on their location, a significant number of sites identified are considered to have positive effects due to promoting integration with existing communities.

- 5.2.14 It should be noted that overarching Core Strategy policies, particularly on economy and affordable housing, have already been assessed as having a positive effect and will continue to inform the development of sites within the DaSA. The Core Strategy 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.

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

- 5.2.15 Overall, there are beneficial effects for this objective from the plan. There has been a considerable focus on locating development in locations with good accessibility to education facilities. This is in accordance with the service centre approach outlined in more detail in the commentary on objective 7.
- 5.2.16 Hastings benefits from a university campus as well as colleges. Bexhill has a college and two secondary schools. Other Rother settlements with secondary schools are Battle, Rye and Robertsbridge. There are many primary schools, including in most larger villages (see Rural Settlements Study Appendix 2 for more details of primary school locations). Therefore, development sites that are accessible to these facilities are considered more sustainable, with particular weighting on walking distance to primary schools and a secondary emphasis on public transport accessibility to all education establishments.

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

- 5.2.17 Cumulatively the plan has a positive effect on economic growth. In particular, policy DEC3 offers valuable protection to existing employment sites, whereas Policy DCO1 similarly offers some protection to sites of social or economic value. Policy DIM1 on comprehensive development is considered to be likely to be beneficial on balance in promoting mixed-uses sites that secure a range of benefits, including economic, in addition to residential.

- 5.2.18 Policies that define town centre and commercial areas (BEX12, BEX13, BEX14, BEX6) are also viewed to have a positive effect on economic growth and competitiveness. A small number of sites have a negative assessment on this factor in situations where the current, or most recent, use was economic or commercial; or such uses were realistic alternative to development. Conversely there are a handful of specific allocations of economy and employment which obviously will have a positive effect on this SA objective, including: BEX3 Land at North Bexhill; MAR1: Land at Felon's Field, Marley Lane; and HAS3 – Land east of A265 Ivyhouse Lane.
- 5.2.19 As with other SA objectives, the adopted and overarching Core Strategy, has in effect informed the DaSA throughout, so the positive effects identified in the SA of Core Strategy remain applicable here.

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

- 5.2.20 Overall, there are beneficial effects for this objective from the plan. The original Core Strategy distribution of development was based primarily on a „service centre“ approach. The DaSA follows on from and conforms with, the Core Strategy. Therefore there has been an inbuilt focus on locating development in locations with good accessibility to education facilities particularly primary schools. The overwhelming majority of sites score positively in this respect, as do policies that define town centre and commercial areas (BEX12, BEX13, BEX14, BEX6).

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

- 5.2.21 Generally, the plan has a positive effect on this objective. Perhaps the most significant policy in the plan in terms of Objective 8 is BEX14 which proposes to define a „Bexhill Cultural Area“ where arts, culture and tourism will be the primary focus.
- 5.2.22 Larger cultural facilities (theatres, cinemas, galleries, libraries) are quite limited within the District confined to nearby Hastings, Bexhill and to a lesser extent to Battle and Rye.
- 5.2.23 Smaller and more local-serving community and leisure facilities (community halls, places of worship, play areas, sports pitches) are more widespread and commonly found in larger villages as well as higher order centres.
- 5.2.24 Many generic policies are neutral or not relevant to this objective, although Policy DCO1 which seeks to protect sites of social value is a notable positive

effect. Most site allocations are positive, since their proximity to cultural and leisure facilities has been a key factor in the consideration of their suitability.

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

- 5.2.25 Whilst the balance of effects on this objective are positive, objective 9 is one of the objectives where complete positive effects would be difficult to achieve for the reasons set out in section 4.2. For example; national and local policy has clear direction for making the most effective and efficient use of land, prioritising previously developed land. However, in Rother the scale of development required inevitably means that development of green-field sites will be necessary. Therefore, the significance of beneficial effects is reducing over time as previously developed land and infill opportunities unfortunately become scarcer.
- 5.2.26 The vast majority of the District's agricultural land, including all that has been considered for development, is of average quality (grades 3 or 4). Smaller areas of higher quality (grades 1 and 2) are located towards the east of the District along the Brede Valley and across the East Guldeford levels. Such areas have not been considered for suitable for development, although for reasons not solely related to agricultural land quality.
- 5.2.27 The ability of a site to make best use of developable land and apply suitable density standards has been a factor in considerations on a site by site basis, for which most site-specific policies respond positively. Conversely, the effect of one generic policy (DHG3 External Residential Areas) may be that the comparatively high densities achieved on some development sites in recent years will no longer be possible in future, hence a negative effect on this objective. Other negative factors on specific sites relate to the immediate availability of utility services on site.
- 5.2.28 Positive scores may also partially derive from the scope of a site to be laid out on an east-west axis and take advantage of both passive solar gain and solar technology. However, in most cases the ability to orientate layout is largely dictated to be the site shape, topography and access point.

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

- 5.2.29 In a rural District that is accommodating significant growth, positive scores for *reducing road congestion* are difficult to achieve, particularly as public

transport options also tend to be limited or infrequent, and subject to increasing economic pressures nationwide.

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

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

- 5.2.33 An increase in the number of households and businesses in the District has the potential for an adverse effect on reducing greenhouse gas emissions, although the plan makes positive efforts to reduce the need to travel by car on a site-by-site basis by promoting walking and cycling (including one allocation specifically for a new walking/cycling route WES4).
- 5.2.34 Policy options for renewable energy are part of the consultation, which will develop pre-existing Core Strategy policy SRM1 further. Policy SRM1 was supportive of renewable energy, subject to consideration of other plan constraints. There is scope for a more positive impact should a site-specific allocation for wind turbines, or specific measures to promote a small scale biomass plant, come forward through the plan.

- 5.2.35 The plan will probably avoid a net loss of trees, since all areas of woodland have been avoided. There may even be some net gain in trees and hedgerows as a result of the plans' implementation, as several sites require a supporting landscaping scheme and/or green infrastructure. However, the effects are likely to be in the long term, rather than immediate, given the necessary time for trees and landscaping to reach maturity.

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

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

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

- 5.2.39 The plan, particularly Policy DRM1, will have a positive effect on water efficiency by applying a higher water efficiency standard.
- 5.2.40 The promotion of SuDS via policy DEN5 also will have a positive effect in improving water quality and minimising the risk of pollution to water sources. A particular issue with the Pevensey Levels water quality, highlighted in the HRA process, has also been addressed by Policy DEN5.
- 5.2.41 Site policies are also generally positive, avoiding groundwater source protection zones / aquifers and generally positively incorporating watercourses within layouts.

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

- 5.2.42 The plan will have a generally positive and beneficial overall effect on objective 14, particularly via policy DEN4 „Biodiversity and green space, but also DEN5, HAS4 and HAS5.
- 5.2.43 The positive measures required by DEN4, as well as Core Strategy EN5 on which it is based, include a focus on provision of priority habitats and connectivity, as well as the avoidance of harm to existing ecological features. These sentiments have generally been reflected in site layouts and parameters which also positively address the issue, hence a number of positive scores for objective 14 in relation to site policies. Bexhill policies have 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.

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

- 5.2.44 Several emerging DaSA policies are identified as having positive effects on townscape and built environment. Policies DEN1 and DEN2 have a notably positive effect on landscape and High Weald AONB character, supported by DEN3, DEN4 and DEN7.
- 5.2.45 Policies DHG5, DHG6, DHG7 and DEC1 will have positive effects in terms of townscape.
- 5.2.46 In addition, many site-specific policies are also deemed to have a positive effect. This is despite the fact that many are actually greenfield sites within the AONB itself. This is because sites have been carefully selected to avoid negative landscape impacts as far as possible, including negative impacts on key features of the High Weald AONB. Positive treatments have included landscaping to enhance the immediate environment.

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

- 5.2.47 Effects on objective 16 are largely neutral. Policy DHG3 is deemed to be positive in setting a clear policy direction for refuse/recycling standards in relation to external residential areas.

- 5.2.48 There are two household waste recycling facilities in the District – at Mountfield (on the A21 north of Battle) and at Pebsham (Between Bexhill and Hastings). Development locations accessible to these two sites, and to a secondary extent, accessible to the more numerous „bring“ recycling sites are deemed to score more positively against objective 16.

### **5.3 Cumulative and Synergistic Effects**

#### Cumulative Effects

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



- 5.3.5 Reducing road congestion may be achievable through certain policies 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.

#### Synergistic Effects

- 5.3.6 Synergistic effects can be described as those that are greater than the sum of the individual effects.
- 5.3.7 There are several examples of positive synergistic effects in the plan, including the following:
- 5.3.8 *The promotion of sustainable forms of transport (e.g. bus, train, walking, cycling) as a means to reduce road congestion.*

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

- 5.3.9 *The promotion of SuDS to reduce flood risk.*

This may have a synergistic benefit for ecology and biodiversity via the creation of ponds, wetland habitats and green roofs, which in turn have an educational value „on the doorstep“ of residential areas, increasing awareness of ecological issues. Several protected species (such as the Great Crested Newt) rely on wetland habitats. SuDS may also benefit the character of the High Weald AONB designation, for which ponds are a key character feature. If sensitively designed, SuDS may provide good quality amenity spaces for the enjoyment of residents, in turn benefitting their health and quality of life. The provision of good quality green and blue infrastructure has even been demonstrated to have economic benefits, enhancing the attractiveness of locations as a place to live and to work.

#### 5.3.10 *Protecting and enhancing the high quality built environment.*

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

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

#### The Scope and Role of Mitigation

- 5.4.1 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 and its policy components. Mitigation measures can also include recommendation for enhancing the beneficial effects of policies.
- 5.4.2 As highlighted in section 4.2 and Table 4, there is an inherent incompatibility of some SA objectives, particularly linked to SA objectives 1 and 6. Therefore it is not possible to mitigate all negative effects.
- 5.4.3 Mitigation measures on a site-specific scale have been borne out of the numerous sustainability appraisals of sites, as set out in Appendix 4.
- 5.4.4 However, other policies (or policy options) would have a mitigating role in themselves, for the plan as a whole, as discussed below.

#### Mitigating DaSA Policies

- 5.4.5 The following policies are considered to have a key role in limiting potentially damaging impacts of the plan as a whole:
- *Policy DRM1: Water Efficiency*
  - *Options Renewable Energy*
  - *Policy DEN1: Maintaining Landscape Character*
  - *Policy DEN2: The High Weald Area of Outstanding Natural Beauty*
  - *Policy DEN4: Biodiversity and Green Space*
  - *Policy DEN5: Sustainable Drainage*
  - *Policy DEN6: Land Stability (including Fairlight/Pett section)*
  - *Policy DEN7: Environmental Pollution*

- 5.4.6 These are in addition to the mitigating policies of Part 1 of the Local Plan, the „Core Strategy“. These were outlined in the „Proposed Submission Core Strategy Sustainability Appraisal – August 2011“

#### Other Statutory Documents

- 5.4.7 Reference may also be made to proposed mitigation within other plans of partner organisations, including:
- 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 Plan, in terms of waste reduction, promotion of sustainable resource management, etc.
  - The High Weald AONB Management Plan, in terms of measures promoting the preservation and enhancement of the character of the designation (which covers 83% of the District).

### **5.5 Relationship to DaSA Site Assessment Process**

- 5.5.1 The conclusions of the SA/SEA process are intended to give an overview of the suitability of sites for particular uses in terms of broad sustainability principles. These must be interpreted in conjunction with the more detailed site assessments, as referred to in previous sections.
- 5.5.2 The process for bringing the two assessments together is discussed in separate „DaSA Sites Methodology Background Paper“.

## **6. CONSULTATION AND MONITORING**

### **6.1 Consultation**

#### The Statutory Environmental Bodies (SEBs)

6.1.1 Regulation 4 of the Environmental Assessment of Plans and Programmes Regulations 2004 defines certain organisations with environmental responsibilities as consultation bodies. In England the consultation bodies or „SEBs“ (Statutory Environmental Bodies) are:

- Historic England<sup>3</sup>
- Natural England and
- The Environment Agency

#### Consultation on the DASA SA Scoping Report

6.1.2 With reference to Figure 1, Task A5 required the planning authority to consult the consultation bodies or SEBs on the Sustainability Appraisal Scoping Report.

6.1.3 Although not required by the Act (2004), in order to ensure the approach taken to the SA is most appropriate for the DASA, comments on a version of the SA Scoping Report were also welcomed from any persons or organisations wishing to participate.

6.1.4 An initial version of this report was therefore published on the Council's website in September 2014 for a consultation period of 6 weeks, and then a slightly amended version was published for a further 6 week period ending in February 2015. Comments were invited from interested persons or organisations. At the same time, the consultation bodies were specifically notified and invited to comment. In December 2015, Rother District Council further consulted with the SEBs regarding further proposed amendments to the Scoping Report, and their comments were incorporated into a version published in February 2016. Finally,, following further dialogue with the SEBs the final DASA SA Scoping Report was published in August 2016.

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<sup>3</sup>Title from 01/04/15, formerly known as English Heritage.

## Consulting on the Main SA

- 6.1.5 The above sets out who should be consulted on the *Scoping Report*. With regard to this main SA assessment of the DaSA, the local planning authority must consult the consultation bodies and other parties who, in its opinion, are affected or likely to be affected by, or have an interest in, the decisions involved in the assessment and adoption or making of the plan. Further details on consultation procedures are set out in regulation 13 of the Environmental Assessment of Plans and Programmes Regulations 2004.
- 6.1.6 The PPG sets out that the local planning authority may also want to consult those they are inviting representations from, as part of the development of the Local Plan itself. The sustainability appraisal report, including the non-technical summary, must be published alongside the draft Local Plan for a minimum of six weeks.
- 6.1.7 Therefore, this SA will be available for public consultation alongside the DaSA Options and Preferred Options (expected date from December 2016).

## **6.2 Monitoring**

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

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

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

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

- 6.2.3 The sustainability framework (Section 4.1) is a good starting point for developing targets and indicators for monitoring, which are in turn reflected in the updated Baseline Information, as set out in Appendix 2.
- 6.2.4 Baseline information for Rother’s SA has previously been published within the DaSA SA Scoping Report (August 2016), the Updated Baseline Information (Appendix 1) of the Proposed Submission Core Strategy SA (August 2011) and the LDF Scoping Report of June 2008. The updated Appendix 2 of this current report, demonstrates the continuous monitoring process that is place in support of Rother’s Sustainability Appraisal.

- 6.2.5 Monitoring for the SA can also be part of the wider monitoring process for the Local Plan. 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 regular monitoring of the Local Plan.



**Rother District Council  
Town Hall  
Bexhill-on-Sea  
East Sussex  
TN39 3JX**

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