



Rother District Council

# Core Strategy

**Sustainability Appraisal  
of the Council's proposed  
revised modifications,  
as presented to  
Full Council on  
8<sup>th</sup> July 2013**



July 2013

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Issues &  
Options



Strategy  
Directions



Pre - Submission



Examination



Adoption





**Local Plan Core Strategy**  
**Sustainability Appraisal of the Council's**  
**proposed revised modifications**  
as presented to Full Council on 8<sup>th</sup> July 2013

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## **1. NON-TECHNICAL SUMMARY**

### **1.1 Introduction**

1.1.1 This report is a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of proposed revised main modifications to the Council's Core Strategy, which forms the heart of its new Local Plan (referred to below as the 'Local Plan Strategy'). These relate primarily to the potential to increase housing provision within the Strategy.

1.1.2 The purpose of the SA and SEA process is to help the Council ensure that its Local Plan most effectively contributes to achieving sustainable development in the District. This is an iterative process; hence, this report builds on, and should be read in conjunction with, the following earlier reports:

- Initial Sustainability Appraisal Report referred to in the document as the 'Initial SA'
- Proposed Submission Core Strategy Sustainability Appraisal (incorporating focused amendments) – referred to in the document as the 'PSCS SA'
- Sustainability Appraisal of the Council's Proposed Modifications as considered by Full Council in January 2013 - – referred to in the document as the 'Jan 13 Mods SA'

1.1.3 This SA considers what reasonable options there are in terms of both the scale and distribution of further new housing in Rother District, essentially in response to the National Planning Policy Framework (NPPF) at a national level, and a new assessment of local housing needs at the local level. Identification of reasonable options is set out at Section 5 of this SA and the detailed assessment in Section 6, which comprise the substance of this SA.

### **1.2 Scope of the SA**

1.2.1 The identification of reasonable options in Sections 5 and 6 considers the potential for additional development in the District as a whole and at each of the spatial areas of the Strategy (i.e. Bexhill, Hastings Fringes, Rye, Battle and Rural Areas).

1.2.2 In terms of the overall scale of growth, the PSCS proposed some 3,700-4,100 dwellings in the District over the period 2011-2028. This was in line with, and supported by, Option B2 in the PSCS SA. At the time, this was favoured in SA terms over a scale of development equivalent to the South East Plan rate.

1.2.3 Subsequently, in January 2013, greater certainty over the timing of the Bexhill to Hastings Link Road and associated employment land releases provided the basis for planning for more housing in Bexhill, while the Rural Areas were also accepted, through the Jan 13 Mods SA, as being capable of achieving the upper level identified in the PSCS. The net effect of these proposed

modifications was to increase the level of house building to that contained in the South East Plan.

- 1.2.4 This SA responds to the more recent 'Hastings and Rother Strategic Housing Market Assessment Update: Housing needs Assessment, June 2013'. It reconsiders higher levels of development, drawing on a review of the Council's 'Strategic Housing Land Availability Study' (SHLAA) as well as assessments of transport network and housing market capacity factors affecting growth at Bexhill.
- 1.2.5 Perhaps most critically, this SA places an increased weight on 'economic' factors, reflecting the strong emphasis on these by national policy, most notably the National Planning Policy Framework, within which context the Core Strategy is now prepared.
- 1.2.6 Therefore, whilst assessments remain substantially similar to previous ones, this greater weight given to the contribution of economic growth by increased housing provision, relative to environmental and social factors, impacts on the balancing of increasingly conflicting implications in reaching conclusions on the scale of sustainable development.

### The Options

- 1.2.7 In summary, the further spatial options which are assessed are:

#### Overall District-Wide Scale of Growth

Option B3: A higher rate of development than previously directed by the South East Plan. This would equate to 335 dwellings per year or at least 5,700 dwellings (an increase of +18.5% vis-à-vis the figure in the revoked South East Plan)

Option B4: A higher rate of development than previously directed by the SE Plan, in order to achieve the objectively assessed need of 6,180 dwellings - (an increase of +28.5% vis-à-vis the figure in the revoked South East Plan)

#### Bexhill Scale of Growth

Option D4: A higher rate of growth in recognition of changed circumstances, equating to 3,100 net additional dwellings (average of 182 p/a)

#### Hastings Fringes Scale of Growth

Option E2: A higher level of residential development (100-250 dwellings) in recognition of changed circumstances.

#### Rye and Rye Harbour Scale of Growth

Option G3: A slightly higher level of residential development, 355-400 (equating to 22 p/a) dwellings in recognition of changed circumstances.

### Battle Scale of Growth

Option 3: A higher rate of residential development in recognition of changed circumstances, 475-500 dwellings over the period 2011-2028 (equating to 29 dwellings p/a).

### Rural Areas Scale of Growth

Rural Areas Option 4: 1,650-1,700 dwellings or 95-100 dwellings per annum

- 1.2.8 The detailed appraisals of other options referred to in the document can be viewed in earlier iterations of the SA – see paragraph 1.1.2 above.

## **1.3 Outcomes of the SA process**

- 1.3.1 The SA of the overall scale of growth shows the relative implications of different scales of housing on the range of economic, social and environmental sustainability criteria. While the scale of housing equivalent to the South East Plan level was previously assessed (in the SA of Proposed Modifications, January 2013) as being sustainable, this SA concludes that a higher level of housing can also be regarded as sustainable when weight is given to the need to accommodate further housing to contribute to projected needs and to support wider economic recovery.
- 1.3.2 The extent of further housing growth that is sustainable is set in the context of increasing negative impacts on environmental, especially landscape, criteria and in relation to the extent it supports, and relates to, employment growth, access to affordable housing and other community objectives.
- 1.3.3 Allowing due weight to housing growth factors, the SA concludes that of the order of 5,700 dwellings over the plan period is sustainable, notwithstanding the some negative impacts in respect of the factors noted above. Policies that require due regard to the provision of employment opportunities and to environmental conservation help to mitigate adverse impacts.
- 1.3.4 As the SA of some 6,180 dwellings shows, as the amount of housing increases further, so the negative environmental, economic and local community implications are found to become progressively greater, such that it is difficult to conclude that all sustainability elements could be integrated. This, and any higher, scenario would require substantial further amounts of growth in villages already identified for increased housebuilding, in an Area of Outstanding Natural Beauty which would impact significantly on their individual character and, collectively, on the very essence of the AONB itself.
- 1.3.5 The appraisals of the spatial policy areas confirm that the increased scale of housing to some 5,700 dwellings is capable of being accommodated, sustainably. Higher levels of housing are not appraised at the spatial area

level as the reasonable alternatives for more growth in each area are already assessed as part of the district-wide SA.



## 2. CONTEXT

### 2.1 Sustainability Appraisal and Strategic Environmental Assessment

2.1.1 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.

### 2.2 Previous Versions of the Core Strategy SA

2.2.1 Sustainability Appraisal has been undertaken throughout the preparation of the Core Strategy. This latest SA document supplements earlier iterations of the Core Strategy SA, as set out below:

2.2.2 In January 2013, a further '**Sustainability Appraisal of the Council's proposed modifications**' was undertaken. This supplements the Council's proposed modifications to the Core Strategy's housing provisions in particular. It is referred to in this document as the 'Jan 13 Mods SA'.

2.2.3 The SA of the Proposed Submission Core Strategy was published alongside the Core Strategy consultation in the 12 week period 19th August 2011 to 11th November 2011. Subsequently, in June 2012, the Council published 'focused amendments' to the Core Strategy, which includes amendments to the SA. These were incorporated in the revised '**Proposed Submission Core Strategy Sustainability Appraisal (incorporating the focused amendments)**' published in June 2012. This is referred to in this document as the '*PSCS SA*'.

2.2.4 Comments were also previously invited on the Initial SA Report, referred to in this document as the '*Initial SA*'. This was made available alongside the Core Strategy 'Consultation on Strategy Directions' during the twelve-week consultation period 7th November 2008 - 30th January 2009. Previous comments made on the Core Strategy Sustainability Appraisal as part of the consultation are still available to view via this [web-site](#).

2.2.5 The Sustainability Appraisal Scoping Report first underwent statutory consultation in August 2006. Details of the Scoping Report can be found in the following section 2.3.

2.2.6 Therefore, this SA Report must be read in conjunction with earlier SA Reports, especially as reference is made to the appraisals in these earlier SA Reports in relation to the scale of housing in each spatial area, as well as in the District as a whole.

## **2.3 Sustainability Appraisal Scoping Report**

- 2.3.1 The scope of the SA is defined in the stakeholders' consultation document, the SA Scoping Report, which underwent statutory consultation in August 2006. This set out the context and objectives for the SA, collected baseline data and identified key issues / problems for the District and devised a Sustainability Appraisal Framework against which options and strategies can be tested.
- 2.3.2 An updated revision of the Scoping Report was issued to the statutory consultees in December 2007 and this was approved in February 2008.

## **2.4 Scope and Purpose of this Sustainability Appraisal (SA) Report of Core Strategy Revised Modifications**

- 2.4.1 This SA assesses the proposed revised modifications being considered by Rother District Council in order to address soundness issues raised by the Local Plan Strategy Inspector in relation to the Council's emerging Core Strategy.
- 2.4.2 This work has been necessitated because of the combined effects of the revocation of the South East Plan and the requirements of the National Planning Policy Framework ("the Framework") in relation to housing provision. As the Inspector has highlighted in correspondence, the South East Plan's provisions no longer carry any weight. Therefore, while they can provide a benchmark for the outcome of this new process, the critical test is now that set out at paragraph 47 of the Framework, namely:

*'To boost significantly the supply of housing, local planning authorities should:*

- *use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;'*

- 2.4.3 The purpose of this SA is to inform the Council's decision on the proposed revised modifications to submit to the Inspector and, specifically, to assist in ensuring that the modifications promote sustainable development.

## **2.5 Structure of the Report**

- 2.5.1 The structure of this document mirrors as far as possible that of earlier versions of the Core Strategy SA. Consideration of the spatial options underpinning the Proposed Revised Modifications is contained in Section 5. They propose a further overall increase in the amount of housing to be built in the District over the period of the Strategy, and where this increase will be accommodated. In effect, this section presents a review of options in relation to scale of growth, both district-wide and in individual spatial areas.

- 2.5.2 The sustainability of these revised options is also appraised in Section 5. Comparisons are made to related options already appraised in the earlier SA reports, critically in term of their relative strengths and weaknesses in relation to the SA objectives. The conclusions of the SA of spatial options inform the proposed modifications to the policies themselves.
- 2.5.3 Those policies materially changed by the proposed modifications are appraised in Section 6. These include SAs of the spatial policies proposed to be modified in terms of their scale of housing, as well as of core policies to be modified both as a consequence of the SA of spatial policies and in line with statements by officers at the hearings to address valid concerns raised.
- 2.5.4 Other sections of the report consider updating, or further work required as a consequence of the proposed modifications, such as mitigation measures (Section 7). Attention is also drawn to Section 3, which presents an update to 'Sustainability Background' in relation to a number of contextual changes which themselves have influenced the appraisal, and re-appraisal, of options.

### 3. SUSTAINABILITY BACKGROUND - UPDATE

#### 3.1 Purpose of Update

3.1.1 This section updates the 'Sustainability Background' (Section 3) in both the Jan 13 Mods SA and in the PSCS SA in relation to a range of other plans, strategies and evidence studies, as well as to changes in social, economic and environmental circumstances, and considers the implications. Notable strategies, plans and programmes are discussed below.

#### 3.2 South East Plan Revocation

##### *Process of SE Plan Revocation*

3.2.1 The Regional Strategy for the South East (Partial Revocation) Order 2013 came into force on the 25 March 2013. The Order revokes the Regional Strategy for the South East<sup>1</sup> which no longer forms part of the Development Plan. More detail on the revocation can be seen via the following links:  
The written ministerial statement of 14 February at:  
[http://www.parliament.uk/documents/commons-vote-office/February\\_2013/14-February/6.DCLG-Regional-Planning.pdf](http://www.parliament.uk/documents/commons-vote-office/February_2013/14-February/6.DCLG-Regional-Planning.pdf)

The Regional Strategy for the South East (Partial Revocation) Order 2013 (S.I. 2013/427) is available at:  
<http://www.legislation.gov.uk/ukSI/2013/427/contents/made>

The 'Strategic Environmental Assessment of the Revocation of the South East Regional Strategy: post adoption statement' and associated Environmental Report are available from:  
<https://www.gov.uk/government/consultations/strategic-environmental-assessment-about-revoking-the-south-east-regional-strategy-environmental-report>

With the earlier Environmental Report on the revocation of the South East Plan at:  
<http://webarchive.nationalarchives.gov.uk/20120919154703/http://www.communities.gov.uk/publications/planningandbuilding/revocationserss>

##### *Local Implications of SE Plan Revocation*

3.2.2 All participants in the Rother Local Plan Core Strategy examination process were invited to submit any comments regarding the implications of the revocation on their representations to the submitted Core Strategy by Friday 19 April. In responding to this consultation, the critical issue associated with the revocation of the South East Plan is the impact on housing provision in the District.

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<sup>1</sup>Except for Policy NRM6 which is retained. It relates to new residential development near the Thames Basin Heaths Special Protection Area.

- 3.2.3 Previously, the South East Plan, prepared by the then Regional Assembly and approved by the Secretary of State following independent examination, provided the basis for district housing targets. Its distribution of housing was based on the potential for sustainable growth across the region and in its constituent 'housing market areas' (HMAs). Rother and Hastings considered together formed a discrete HMA.
- 3.2.4 Locally, the housing target took account of the poor economic performance of the Sussex Coast, and especially Hastings and Bexhill, and concluded that economic regeneration was the priority (and that housing growth should be consistent with supporting economic growth). It also recognised that, for the rest of Rother, the potential for growth is constrained by its Area of Outstanding National Beauty (AONB) designation.
- 3.2.5 Hence, the housing target for Rother (and Hastings) was less than the market may have sought. This was largely balanced in the South East Plan by higher levels of growth in more buoyant, accessible and less constrained areas, such as Ashford and the Thames Gateway.
- 3.2.6 With the South East Plan revoked, the National Planning Policy Framework (NPPF) provides the basis for determining housing provision. This requires that local planning authorities meet the '*full, objectively assessed need for market and affordable housing in the housing market area, 'as far as is consistent with the policies set out in this Framework'*'.
- 3.2.7 The consequence of this is significant, not least as it requires the Council to reassess not only the housing capacity of the area, but also the need for housing, as well as putting an obligation on it to seek to accommodate current housing need elsewhere, in liaison with other LPAs.
- 3.2.8 Following revocation, the Local Plan Core Strategy Inspector wrote to the Council to advise that:
- i) Core Strategy Policy OSS2, which provides a contingency in the event of significant delay or cancellation of the Link Road, would not be consistent with the NPPF in that it reduces the overall housing numbers to be provided;
  - ii) The Council should revisit its assessment of housing need in the light of the even greater weight now given to the NPPF and to meeting current objectively assessed need; and
  - iii) Rother District Council and Hastings Borough Council need to work together to establish the 'objectively assessed need' and explore the option of accommodating this to its logical conclusion (i.e. as far as is consistent with policies in the NPPF), if necessary seeking help from other Councils under the Duty to Co-operate.

### 3.3 Bexhill to Hastings Link Road Update

- 3.3.1 The Link Road is critical to the Local Plan Strategy, as it has a major bearing on the capacity for development at Bexhill. Following Government changes to the funding of major transport schemes, the original timetable for construction of the Bexhill Hastings Link Road was put on hold.
- 3.3.2 There is one notable update since the Jan'13 Mods SA. In April 2013 the Department for Transport announced final funding approval for the Bexhill to Hastings Link Road<sup>2</sup>. Construction has commenced. The road is now expected to open in April 2015; more information can be found here: <http://www.eastsussex.gov.uk/roadsandtransport/bexhillhastingslinkroad/about.htm>
- 3.3.3 The recent progress towards Link Road construction has had a significant catalyst effect on developer interest and activity, in the adjacent major mixed-use allocations at North East Bexhill. In particular, an agreement between the principal landowner and the local regeneration company is resulting in plans being made for the construction of the spine road to serve the development, together with business units. There is also active involvement with developers and house builders for the rest of the allocated land. (Details are set out in the recent report entitled Housing Delivery in Bexhill and Hastings.)
- 3.3.4 The net effect is that development in North East Bexhill is now more certain and is expected to be developed sooner than previously anticipated. In particular, the business land is now much more likely to be developed in parallel with the housing, if not somewhat in advance. (Details of respective programmes and trajectories are contained in statements to the Hearings.)

### 3.4 Local Strategies, Plans and Programmes

- 3.4.1 Subsequent to revocation of the SE Plan, the following pieces of evidence work have been completed in order to determine and test housing needs and provision:
- a) An update of the earlier **Strategic Housing Market Assessment**, specifically to determine the objectively assessed needs for market and affordable housing;
  - b) A report on the market environment for development of new housing in both Hastings and Bexhill, with more detailed examination of potential housing delivery in Bexhill;
  - c) A thorough review of the potential to accommodate further housing in the District through a review of the 2010 **Strategic Housing Land Availability Assessment**;

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<sup>2</sup>The department will contribute a maximum of £56.85m towards the scheme. See: [GOV.UK – DfT Funding announcement](#).

3.4.2 The main findings of the respective studies are outlined below.

#### Strategic Housing Market Assessment (SHMA) Update

3.4.3 The assessment of housing needs has been undertaken by consultants working with Council officers to ensure robustness. Various demographic projections have been reviewed, with more up-to-date ones prepared with critical support from the Research and Information Team at East Sussex County Council.

3.4.4 The National Planning Policy Framework (“the Framework”) sets out the national objective to significantly boost housing supply. Paragraph 159 identifies the scope of the necessary assessment, in terms of:

- meeting household projections, which take account of migration and demographic change;
- addressing the need for all types of housing including affordable housing, and catering for housing demand;
- Given the central objective of achieving economic growth, paragraph 20 of the Framework expects that plans meet the development needs of business; Hence, a further test is taken to be the supply of housing needed to support the economic potential of an area.

3.4.5 The overall conclusion is that delivery of the new homes identified as being required in the Baseline Scenario is that which fulfils an expectation to meet all three dimensions of housing need. The Baseline Scenario referred to is the most recent demographic projection using the DCLG’s April 2013 household projections and the most recent data from the 2011 Census. Specifically, this gives a housing need for Rother of 6,178 new homes (363 new homes pa) over the period 2011-28. It also identifies a need for 6,863 new homes in Hastings (404 pa), giving a total across the ‘Housing Market Area’ of 13,041 new homes (767 pa).

3.4.6 It is noteworthy that in her letter dated 5 April 2013, the Inspector advised that the Council have regard to the guidance on the ‘Howmanyhomes’ website, which indicated a requirement of 9,947 new dwellings for Rother. However, the SHMA concludes that a lower figure of 6,178 dwellings is appropriate for Rother. The reason for this is that the higher figure was based on earlier projections, which later household projections by the Department for Communities and Local Government, and Census results, now show over-estimated reductions in average household size (although population growth projections remain very similar).

3.4.7 A further consideration is that Hastings is unable to meet all its assessed housing needs in the Borough, essentially for physical capacity reasons. Based on its Proposed Modifications (currently out to consultation), for 3,400 dwellings, it would fall short by some 3,400 dwellings. Therefore, if it is able to meet some of Hastings’ unmet housing need, Rother should endeavour to do so, especially as it is in the same ‘Housing Market Area’. In fact, HBC has already asked if Rother could accommodate some or all of its current need. This has been considered, but for reasons of Rother’s own environmental and

infrastructure constraints (elaborated upon below) this is not considered possible. The pattern of in-migration into Hastings suggests relationships with other large and coastal towns in this part of the south east, particularly in Kent but also parts of Surrey and West Sussex as well as East Sussex, which should be explored.

3.4.8 Also notable from the SHMA Update is the qualification which states that:

*However, the level of housing associated with the Baseline Scenario would to a degree work against the economic objectives of the two Councils to reduce unemployment, increase labour force participation, and reduce net out-commuting; the implication being that a lower level housing could be more beneficial in this respect. A lower level of housing provision than implied by the demographically driven baseline scenario could also meet the requirement for affordable homes.*

3.4.9 In conclusion, Rother should be aiming to provide for some 6,180 net additional dwellings over the Core Strategy period, although taking account of the (low level) completions 2011-2013, the residual requirement actually equates to 394 dwellings/year.

#### Report into Housing Delivery in Bexhill and Hastings

3.4.10 Consultants have reviewed the market prospects for housing growth at Bexhill and Hastings, as the principal urban centres of the local housing and labour market area.

3.4.11 The main conclusion is that there is a realistic prospect of housing growth well above that of the recent past, based on the plans of prospective developers of major sites. They conclude that “A number of benchmarks would indicate that it will be challenging to consistently deliver more than 200 homes pa”.

3.4.12 Hence, a total of 3,100 homes over the plan period is taken as the likely upper achievable target for Bexhill (based on completions to date plus 200 pa).

#### Strategic Housing Land Availability Assessment Review (2013)

3.4.13 In light of the Inspector’s concerns, the Strategic Housing Land Availability Assessment (SHLAA) has been the central piece of work has been to test the potential for development at the individual site level, without the limitation of any overall housing requirement. This has involved working with Town and Parish Councils.

3.4.14 The Council previously, in 2010, prepared a Strategic Housing Land Availability Assessment (SHLAA) to demonstrate the deliverability of its housing strategy, to deliver both the quantum of proposed housing and the potential opportunities in each settlement that accorded with its spatial distribution strategy. This has been updated and reviewed, with further testing of assessed sites as well as the evaluation of sites submitted subsequently. The approach has been to test the potential for development at the individual site level, without



the limitation of any overall housing requirement. This 2013 review process has yielded across-the-board increases in housing potentials relative to those previously identified.

3.4.15 On the basis of the capacities identified in the SHLAA at Appendix 3, there is the prospect that housing numbers could be increased as follows:

	Scale of new allocations approved by Council Jan. 2013	Revised SHLAA potential for new allocations June 2013
Bexhill	825	750-1,320
Hastings Fringes	54	50-200
Battle	82-122	165
Rye/Rye Harbour	0 (-55)	115
Rural Areas	439	810
Total	1,353	1,890-2,610

3.4.16 A critical qualification to this assessment is that, while it draws on relevant available information and, for the most part, draws on local knowledge of the Town and Parish Council representatives who have worked alongside officers in reviewing sites, all sites require further investigations as well as input from other interested parties through consultation before they can be confirmed as appropriate sites. Use of the SHLAA Update at this point is to demonstrate the deliverability of the proposed levels of housing growth.

3.4.17 The implications of the potential capacity of these sites upon total housing numbers in the SHLAA, taking into account completions 2011-13, outstanding commitments and relevant windfall allowances, relative to those approved by Council in January, are set out below.

	Total dwellings - approved Jan. 2013	Total dwellings - Revised SHLAA (rounded)
Bexhill	2,700	3,325
Hastings Fringes	100	100-245*
Battle	410-450	500
Rye/Rye Harbour	260-360	400
Rural Areas	1,270	1,670
Total	4,810	5,995-6,145

\* Range attributable to outstanding Natural England objection and other constraints relating to Breadsell Farm (see Hastings Fringes section below)

3.4.18 It can be seen that if these capacities were achievable, having regard to other policies of the Framework, then the objectively assessed housing needs for Rother could, with only a very modest number of large site wind-falls coming forward, be met.

3.4.19 The most significant changes to the current development provisions would be:

- An increase of up to 625 further homes in Bexhill over and above the increase to 4,700 dwellings approved in January 2013
- A possible significant additional development on the edge of Hastings (at Breadsell Farm)
- A relatively large amount of growth at Battle
- Some new development potentials at Rye, although partly balanced by reduced expectations from existing allocations
- A noticeable increase in house building in the Rural Areas, with virtually all identified villages having some further potential for growth

3.4.20 The SHLAA's role is to demonstrate the deliverability of the Core Strategy. It does not represent Council policy. All sites will require further investigations, as well as input from other interested parties through consultation, before they can be confirmed as appropriate sites.

*NB It must be emphasised that the SHLAA was prepared in advance of work on the housing market and transport capacity of further development at Bexhill, which highlighted that a lesser scale of growth, of up to 3,100 dwellings.*

#### Implications of updated local Evidence work

3.4.21 Given the emerging conclusions from the updated evidence work that there is considered to be further housing potential, it is also necessary to undertake further Sustainability Appraisal and Habitat Regulations Assessments (HRAs), the latter relating to the impacts of development on the international nature conservation sites.

3.4.22 A further assessment under the Habitats Regulations is has been done via a 'Supplement' to that prepared for the Proposed Submission Core Strategy and is published separately.

3.4.23 The implications of the updated evidence work are particularly drawn out in the assessment of the 'Overall District-Wide Scale of Growth', the B options in Appendix 1.

### **3.5 Social, economic and environmental conditions**

3.5.1 At a national level, the economic situation remains very challenging. Economic recovery has become the national imperative, although it is likely that the process will be a lengthy and difficult one. The need to promote economic recovery is also the primary influence on policy makers, as exemplified in the National Planning Policy Framework.

3.5.2 At the local level, the Council reports annually on the socio-economic and environmental context for plan-making through its Annual Monitoring Reports. These can be viewed on the Council's website. Reference is also made to the 2011 Census results that are published on the 'East Sussex in Figures' website.

- 3.5.3 The Census highlights the older population structure of the district. It confirms the mid-year estimates of the district's population and households, although there are somewhat fewer children, but more young adults (aged 15-29), than estimated.
- 3.5.4 Most recent migration information shows a general and continuing overall fall in the level of net in-migration to the District over the last 5 years, from some 1,700 people in 2006/07 to 600 people in 2010/11.

## 4.0 APPRAISAL METHODOLOGY

4.1.1 The approach to carrying out the SA is as set out in the PSCS SA (Section 4). The SA objectives and decision-aiding questions are as previously. The scoring criteria are also as throughout the SA process, and are reproduced below:

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

4.1.2 The methodology for assessing the cumulative and synergistic effects of policies is set out below. These are the effects from the interaction of all the policies. Synergistic effects can be described as those that are greater than the sum of the individual effects.

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

## **5. IDENTIFICATION OF THE OPTIONS**

### **5.1 Introduction**

5.1.1 The Council is required to have regard to Government policy as expressed in the NPPF.

5.1.2 This SA further considers options to achieve an increase in housing provision, having due regard to the options that have already been appraised and to the current sustainability background (see Section 3).

5.1.3 Given the generation and appraisal of development options that has occurred throughout the plan-making and SA processes to date, the key issues to be considered in relation to potential modifications to the Strategy to increase housing provision are:

- i) what are the reasonable options having regard to the SA findings at earlier iterations?
- ii) how do these options perform in sustainability terms, both in absolute terms and in comparison with other options already appraised?
- iii) in particular, are there more sustainable options than the supported options carried forward into the Proposed Submission Core Strategy and the January 2013 Proposed Modifications?

### **5.2 The Proposed Revised Modification Options and how they were identified**

5.2.1 As previously outlined, there is a requirement to revisit the assessment of housing need. This is in the light of the even greater weight now given to the NPPF and to meeting current objectively assessed need.

5.2.2 Increasing housing provisions in the Strategy necessitates further appraisal of the scale of growth. Reasonable options therefore need to be identified for the potential to increase the level of housing in each of the respective spatial areas of the plan, and to appraise these against each other (where further options exist) and against already identified options.

5.2.3 This requires a reassessment of the capacity for sustainable development in each of the spatial areas of the District, as well as a review of the potential for house-building levels to increase across the District in both the short, medium and longer terms. There is an inevitable interaction between the appraisal of scales of growth and of the capacity of the spatial areas for sustainable development.

## Overall District-Wide Scale of Growth

### *Previous Assessments of District-Wide Overall Scale of Growth*

5.2.4 Previous SA stages have appraised various options related to the ‘Overall Scale of Growth’, as follows:

<b>SA Stage</b>	<b>Overall District Scale of Growth Options</b>		
	<b>Ref</b>	<b>Option</b>	<b>Conclusions</b>
Jan'13 Mods SA	Option B1	Continue South East Plan requirements (PSCS SA Option B1)	B1a was supported as it was deemed to have performed well in housing and social terms, including in relation to accessibility objectives.
	Option B1a	Continue South East Plan requirements (re-appraisal as proposed modifications) – 283 p/a	The revised appraisal, in SA terms, of this option relative to Option B1 in the PSCS SA, was largely due to the changed context and the proposed distribution of additional development, with most being accommodated in Bexhill, with much lesser increases in the villages and in the Hastings Fringes.
	Option B2	The rate of housing growth in the Proposed Submission Core Strategy (218-241 p/a)	
PSCS SA	Option B1	Continue South East Plan requirements of 280 per annum'	Option B2 was the preferred option. Although option B1 performed better on housing and economic criteria, it was considered at the time that B2 was preferable measured against overall criteria.
	Option B2	A lower rate of development than directed by the SE Plan in recognition of changed circumstances	
Initial SA Nov' 2008	Scale of Growth Option 1	Draft South East Plan requirements of 280 per annum.	A rate of growth 25% higher than the South East Plan was rejected in the Initial SA in favour of the South East Plan rate due to a range of adverse environmental effects, as well as economic growth issues.
	Scale of Growth Option 2	Draft South East Plan requirements + 25% = 350 per annum.	

### *Overall District Scale of Growth: Reasonable Options for Further Appraisal*

5.2.5 For the purposes of this SA, three levels of housing growth are appraised. These supplement those options already appraised and are sufficiently discrete to enable meaningful differences to be identified. The first option takes the level of growth equivalent to that contained in the South East Plan (4,810 dwellings, 2011-2028), as previously preferred. In view of the objectively assessed housing needs for Rother, a figure of 6,180 dwellings is also appraised. In addition, and given the substantial increase that this would represent, an intermediate level of growth equivalent to 5,700 homes over this period is also appraised. This scale of growth is consistent with the findings of the recent evidence studies referred to above. It is recognised that it will also be appropriate to appraise still higher levels of growth in order to contribute to meeting unmet housing need in Hastings. This will be done as a further stage if the 6,180 dwellings target is found to be sustainable.

5.2.6 In respect of 5,700 dwellings, the assumed distribution of development is as the upper levels of the respective spatial options. Higher levels of development at Bexhill, Battle, Rye and the Hastings Fringes, above the upper end of identified ranges where applicable, are not considered 'reasonable options'. Hence, for 6,180 dwellings, the additional housing, of up to 480 dwellings is assuming to be in the Rural Areas.

Option B1a	Continue level equivalent to the now revoked South East Plan requirements (re-appraisal as in Jan 13 Mods SA') – 283 p/a or 4,810 dwellings
<b>Option B3</b>	<b>A higher rate of development than previously directed by the SE Plan, in order to achieve the objectively assessed need of 6,180 dwellings - (an increase of +28.5% vis-à-vis the figure in the revoked South East Plan)</b>
<b>Option B4</b>	<b>A higher rate of development than previously directed by the SE Plan. This would equate to 335 dwellings per year or at least 5,700 dwellings (an increase of +18.5% vis-à-vis the figure in the revoked South East Plan)</b>

Bold denotes new appraisal in this document.

Standard font denotes assessment contained in earlier version of SA. Text indicates which version.

### Scale of growth in the spatial areas

5.2.7 Options for achieving the South East Plan level of housing in each of the spatial areas have already been appraised in earlier iterations of the SA. These are reviewed below in the context of the contextual changes highlighted in Section 3 and a further review of the evidence.

#### Bexhill

5.2.8 The PSCS SA supported a level of development in the Bexhill 2,050 – 2,250 dwellings. The Jan 13 Mods SA supported an increase to 2,700 dwellings.

5.2.9 Bexhill is the principal town within Rother and is largely unconstrained by environmental designations, unlike majority the rest of the District which is part of the High Weald Area of Outstanding Natural Beauty (AONB). Careful consideration should be made to the balance of jobs to support housing growth, the capacity of the transport network to accommodate a higher housing target and compatibility with the overall Core Strategy vision, which seeks for a more vibrant town which attracts a range of households, including families .

*Previous Assessments of Bexhill Scale of Growth*

SA Stage	Overall District Scale of Growth Options		
	Ref	Option	Conclusions
Jan'13 Mods SA	D1	SE Plan rate of development, average of 160 dwellings/year (as per PSCS SA)	Option D1a preferred.
	D1a	2,700 net additional dwellings (159 pa)	
	D2	PSCS rate of 121-132pa (as per PSCS SA)	
PSCS SA	D1	SE Plan rate of development, average of 160 dwellings/year	Option D2 was favoured as, although growth was generally found to support regeneration, this was tempered by an assessment of the "limited capacity to grow the economy quickly" such that <i>'more houses may not complement wider regeneration goals, but instead reinforce retirement and deprivation characteristics'</i> (PSCS SA paragraph 5.42ae).
	D2	2,050-2,250pa. Average of 129 dwellings/year	
	D3	A continuation of 'pre-link road' level of development (75 dwellings per year)	
Initial SA Nov' 2008	Option 1	Maintain Bexhill's Role (low-medium growth level)	The Initial SA options regarding Bexhill considered geographic direction as well as scale of growth. Options 1 and 3 were preferred in conjunction with one another.
	Option 2	Expand Bexhill's role (large growth level)	
	Option 3	Coordinated approach to the Bexhill /Hastings area (medium-large growth level)	

*Bexhill Scale of Growth: Reasonable Options for Further Appraisal*

D1a	2,700 net additional dwellings (159 pa)
<b>D4</b>	<b>A higher rate of growth in recognition of changed circumstances, equating to 3,100 net additional dwellings (average of 182 p/a)</b>

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Hastings Fringes

5.2.10 The PSCS SA supported a level of development in the Hastings fringes of 45-80 dwellings. The Jan 13 Mods SA supported a limited increase to 100 dwellings.

5.2.11 However, recognising that Hastings is the largest town in the housing market area, further consideration is given to the scope to replace this with a range of 100-250 dwellings. This is considered a material change of approach warranting further assessment. The increase is effectively "future-proofing" the



Core Strategy in the event that large-scale development straddling the Borough boundary in the area of Breadsell Farm is subsequently demonstrated to be acceptable, notwithstanding the constraints that prevent such development being regarded as a reasonable expectation at this time.

*Previous Assessments of Hastings Fringes Scale of Growth*

SA Stage	Overall District Scale of Growth Options		
	Ref	Option	Conclusions
Jan'13 Mods SA		As with PSCS SA	The lower rate was preferred (100 dwellings and 3,000 sq.m of employment) remains the preference.
		As with PSCS SA, although the level of dwellings amended slightly upwards to 100 dwellings	
PSCS SA	E	Continue with scale of development identified in 'Consultation on Strategy Directions' (200-450 dwellings and 10,000 sq.m of business floorspace)	A lower rate was preferred (45-80 dwellings and 3,000 sq.m of employment).
		A lower rate of development (45-80 dwellings and 3,000 sq.m of employment)	

*Hastings Fringes Scale of Growth: Reasonable Options for Further Appraisal*

E1	A lower rate of development (100 dwellings and 3,000 sq.m of employment)
E2	<b>A higher level of residential development (100-250 dwellings) in recognition of changed circumstances.</b>

Bold denotes new appraisal in this document.

Standard font denotes assessment contained in earlier version of SA. Text indicates which version.

Rye and Rye Harbour

5.2.12 Previously, the PSCS previously gave consideration to a higher scale of housing development for Rye, as set out in the 'Consultation on Strategy Directions' document, namely 450 dwellings/year (26p/a). It commented that the alternative option was a lower development target, taking account of subsequent work with the Town Council in the 'Rye Town Study', as well as in the SHLAA. Analysis in the PSCS SA showed that both environmental and development constraints suggested a provision of 250-350 net additional dwellings would be more appropriate.

5.2.13 None of the contextual changes identified in Section 3 have a direct bearing on development capacity at Rye, while evidence during the Hearings confirmed the uncertainty surrounding delivery of the largest existing allocation at Rye. The limited progress on this allocation and the few others in Rye and Rye Harbour further questions the deliverability of the upper end of the range.

5.2.14 Nevertheless, given the overall need for housing it is considered reasonable to assess the option of increasing capacity further. Indeed, there was some evidence during the Hearings that suggest additional housing could be achieved via redevelopment. Therefore option G3 explores the option of 22 per annum, which whilst not as high as the 26p/a rejected in the PSCS SA, nonetheless is a level that further evidence work (in particular the 2013 Review of the SHLAA) has suggested may be achievable.

*Previous Assessments of Rye and Rye Harbour Scale of Growth*

SA Stage	Overall District Scale of Growth Options		
	Ref	Option	Conclusions
Jan'13 Mods SA		Essentially as per PSCS, with minor adjustment upwards (260-360 dwellings).	Position remains essentially the same.
PSCS SA	G	Continue with scale of development identified in 'Consultation on Strategy Directions' (450 dwellings or 26p/a, and 10,000 sq.m of business floor-space)	A more cautious (and lower level of residential development) was taken forward as the preferred approach in PSCS, equating to 250-350 dwellings.
		A lower level of development in recognition of changed circumstances	
Initial SA Nov' 2008	Option 1	Strengthen the role of Rye and Rye Harbour. Scale of growth: medium	Both option accepted in part. It was considered that an amalgam of the two options would best address the particular circumstances of the area.
	Option 2	Scale of growth: Limited/low.	

*Rye and Rye Harbour Scale of Growth: Reasonable Options for Further Appraisal*

G1	The position as outlined previously, equating to 260-360 dwellings (18p/a) and 10,000 sq.m of business floorspace.
<b>G3</b>	<b>A slightly higher level of residential development, 355-400 (equating to 22 p/a) dwellings in recognition of changed circumstances.</b>

## Battle

5.2.15 The Initial SA previously considered options for Battle, one of which involved a 'medium scale of growth' (Option 1) and one involved 'limited growth'. The higher rate of growth was supported by the SA. The PSCS SA gave further attention to the distribution of new development in the town. The PSCS already provided for the growth of Battle to support its service centre role, while acknowledging that there is the prospect of some negative impacts on the environmental assets of both the town itself and, potentially, the wider AONB. This conclusion, together with the fact that the PSCS already proposes a substantial scale of development relative to its size and AONB location, indicates that an even higher level of growth is not a reasonable option. Therefore, no proposed modification option is put forward for Battle.

5.2.16 Nevertheless, given the overall need for housing it is considered reasonable to assess the option of increasing capacity further. Therefore option 3 explores the option of 29 per annum, up from 25 p/a in the PSCS SA. This is a level that further evidence work (in particular the 2013 Review of the SHLAA) has suggested may be achievable.

### *Previous Assessments of Battle Scale of Growth*

SA Stage	Overall District Scale of Growth Options		
	Ref	Option	Conclusions
Jan'13 Mods SA		No change	As per previous since broadly similar level of development proposed in Battle, equating to 25 per annum and 10,000sq.m of employment.
PSCS SA		No change from Initial SA	Rate of development in PSCS broadly comparable to that within previous Core Strategy iteration 'Consultation on Strategy Directions' (equating to 25 p/a) and the same level of employment.
Initial SA Nov' 2008	Option 1	Medium scale of growth	The medium rate of growth was supported by the SA and translated into the Consultation on Strategy Directions. It equated to 450-500 dwellings (or approx. 24 p/a) and 10,000 sq.m of employment over the period 2006-2026.
	Option 2	Limited growth	

### *Battle Scale of Growth: Reasonable Options for Further Appraisal*

Option 1	Broadly as per previous assessment, equating to 25p/a and 10,000sq.m of employment.
<b>Option 3</b>	<b>A higher rate of residential development in recognition of changed circumstances, 475-500 dwellings over the period 2011-2028 (equating to 29 dwellings p/a).</b>

### Rural Areas

5.2.17 The scale of development appropriate in the Rural Areas has previously been assessed in a number of ways. The Initial SA considered different options for the overall 'spatial distribution of growth' which involved significantly varying amounts to the villages. It also considered different distributions within the Rural Areas, with 5 Options. These appraisals help inform what can be regarded as 'reasonable options' to accommodate an overall increase in housing in the District.

Initial SA - Spatial Distribution of Growth:

5.2.18 This SA considered five options to achieve the South East Plan housing requirements. It supported a service-centre based option (Option 2). It highlighted that there may be settlements where there would be unacceptable environmental and landscape impacts that limit potential in some cases. The scale of housing under this option for the villages was some 1,200 dwellings. Initial SA - Rural Areas:

5.2.19 Five options were considered, with Option 1 – 'Continue to Focus on Service Centres' "accepted", with two other options also "accepted in part"; these were Option 2 – 'Development to Support Community Needs and Deficiencies' and Option 5 – 'Focus Development on Transport Corridors'.

### *PSCS SA - District-wide spatial distribution*

5.2.20 This SA appraised a redistribution of development elsewhere in the district in the event that there was less development in Bexhill, due to delay or cancellation of the Link Road (Option A1). In appraising this option, it was taken that this would involve a significant proportion of the "deficit" being reallocated to the Rural Areas. The alternative (Option A2) was not increasing housing provisions elsewhere.

5.2.21 Option A2 was supported, as to redistribute growth in Option A1 '*may lead to unsustainable levels of growth in areas such as the High Weald AONB*'.

*SA of Core Strategy Proposed Modifications (January 2013)*

5.2.22 It was considered that there are two reasonable options worthy of further SA to test the potential for a further contribution of the Rural Areas to a higher overall housing provision, which may be compared to the PSCS level:

Option 1 - PSCS level of growth: This was as contained in the Proposed Submission Core Strategy. It provides for 950-1,000 dwellings but, including small site windfalls<sup>3</sup> in Years 5-10, it amounts to some 1,165 dwellings (based on the mid-point).

Option 2 - This amounted to some 1,250 dwellings (74 per annum) including small site windfalls<sup>1</sup>. It is assumed that the additional dwellings are achieved by most villages achieving the upper end of the range of additional allocations identified in Figure 12 of the PSCS.

Option 3 - This amounted to some 1,360 dwellings including small site windfalls<sup>1</sup> (80 per annum). It is assumed that the additional dwellings are achieved by most villages achieving the upper end of the range of additional dwellings identified in Figure 12 of the PSCS (as Option 2) with further dwellings (some 110) focused mainly in the service centre villages (i.e. 'Rural Service Centres' and 'Local Service Villages').

5.2.23 At the time, a higher level of growth was not considered to be a reasonable option in the light of the AONB status of most of Rother's countryside, extensive areas of designated nature conservation importance, as well as flood risk issues affecting a number of villages, as well as the conclusions of the earlier SAs and the Rural Settlements Study.

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<sup>3</sup>See the Council's Proposed Modifications for number and distribution of small windfall sites (less than 6 dwellings), including rural 'exception sites'.

*Previous Assessments of Rural Areas Scale of Growth*

SA Stage	Overall District Scale of Growth Options		
	Ref	Option	Conclusions
Jan'13 Mods SA	Rural Areas Option 1: PSCS Level of Growth 950-1000 dwellings, or 1165 including small site windfalls. Latter figure = 69 p/a		Option 2 that equated most closely to figure in CS Mods (January 2013). It is assumed that the addi- tional dwellings are achieved by most villages achiev- ing the upper end of the range of additional alloca- tions identified in Figure 12 of the PSCS.
	Rural Areas Option 2: 1,250 dwellings (74 per annum)		
	Rural Areas Option 3: 1,360 dwellings 80 per annum.		
PSCS SA	District-wide spatial distribution		This SA appraised a redistribution of development elsewhere in the district in the event that there was less development in Bexhill, due to delay or cancella- tion of the Link Road (Option A1). In appraising this option, it was taken that this would involve a signifi- cant proportion of the “deficit” being reallocated to the Rural Areas. The alternative (Option A2) was not increasing housing provisions elsewhere. Option A2 was supported, as to redistribute growth in Option A1 ‘ <i>may lead to unsustainable levels of growth in areas such as the High Weald AONB</i> ’.
Initial SA Nov’ 2008	Spatial Distribution of Growth (5 options)		This SA considered five options to achieve the South East Plan housing requirements. It supported a ser- vice-centre based option (Option 2). It highlighted that there may be settlements where there would be unacceptable environmental and landscape impacts that limit potential in some cases. The scale of hous- ing under this option for the villages was some 1,200 dwellings.
	Rural Areas		Five options were considered, with Option 1 – ‘Con- tinue to Focus on Service Centres’ “accepted”, with two other options also “accepted in part”; these were Option 2 – ‘Development to Support Community Needs and Deficiencies’ and Option 5 – ‘Focus De- velopment on Transport Corridors’.  These options were also addressed in the Rural Set- tlements Study

*Rural Areas Scale of Growth: Reasonable Options for Further Appraisal*

Rural Areas Option 2:	1250 dwellings (2011-28). Equates to 74 per annum
Rural Areas Option 3:	1360 dwellings (2011-28). Equates to 80 per annum
<b>Rural Areas Option 4:</b>	<b>1670 dwellings (2011-28). Equates to 98 per annum.</b>

## 6. DETAILED SUSTAINABILITY APPRAISAL OF OPTIONS

### 6.1 Overview of Options

- 6.1.1 The earlier section 5.2 outlined a summary of 'The Proposed Modification Options and how they were identified'. The same section contained '*Reasonable Options for Further Appraisal*' tables which show which options are rolled forward from previous iterations of the SA, and which options (in bold text) are assessed for the first time within this report as part of the July 2013 'SA of CS Proposed Revised Modifications'. These latter options are included in detail in this section, and are summarised below:

#### Overall District-Wide Scale of Growth

Option B3: A higher rate of development than previously directed by the SE Plan. This would equate to 335 dwellings per year or at least 5,700 dwellings (an increase of +18.5% vis-à-vis the figure in the revoked South East Plan)

Option B4: A higher rate of development than previously directed by the SE Plan, in order to achieve the objectively assessed need of 6,180 dwellings - (an increase of +28.5% vis-à-vis the figure in the revoked South East Plan)

#### Bexhill Scale of Growth: Reasonable Options for Further Appraisal

Option D4: A higher rate of growth in recognition of changed circumstances, equating to 3,100 net additional dwellings (average of 182 p/a)

#### Hastings Fringes Scale of Growth: Reasonable Options for Further Appraisal

Option E2: A higher level of residential development (100-250 dwellings) in recognition of changed circumstances.

#### Rye and Rye Harbour Scale of Growth: Reasonable Options for Further Appraisal

Option G3: A slightly higher level of residential development, 355-400 (equating to 22 p/a) dwellings in recognition of changed circumstances.

#### Battle Scale of Growth: Reasonable Options for Further Appraisal

Option 3: A higher rate of residential development in recognition of changed circumstances, 475-500 dwellings over the period 2011-2028 (equating to 29 dwellings p/a).

#### Rural Areas Scale of Growth: Reasonable Options for Further Appraisal

Rural Areas Option 4: 1650-1700 dwellings or 95-100 dwellings per annum

The detailed appraisals of other options referred to in the document can be viewed in earlier iterations of the SA -

- Initial Sustainability Appraisal Report referred to in the document as the 'Initial SA'
- Proposed Submission Core Strategy Sustainability Appraisal (incorporating focused amendments) referred to in the document as the PSCS SA.
- 'Sustainability Appraisal of the Council's proposed modifications' (January 2013), referred to in this document as the '*Jan 13 Mods SA*'.



## Option (B) District Wide Scale of Growth

Overall Scale of Growth Option B3 –A higher rate of development than previously directed by the SE Plan. This would equate to 335 dwellings per year or at least 5,700 dwellings (an increase of +18.5% vis-à-vis the figure in the revoked South East Plan)

Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home.	(✓)	✓	✓	Preferable to Option B1a (assessed in Jan 13 Mods SA) since it provides more housing. However, equally beneficial to the baselines scenario (option B4) since the 2013 SHMA concluded that a lower level of housing provision than implied by the demographically driven baseline scenario could also meet the requirement for affordable homes.
2. Improve the health and well-being of the population and reduce inequalities in health	~	(✓)	✓	There is a link between good quality, affordable housing and health and well-being.
3. Reduce crime and the fear of crime	~	(✓)	✓	Facilitating access to housing of all sectors of society, including disadvantaged groups, may help reduce crime.
4. Reduce deprivation and social exclusion	~	(✓)	✓	Easier access to housing may help reduce deprivation and social exclusion. This is beneficial with a higher proportion of housing in the coastal areas (Bexhill, Hastings Fringes, Rye) where these issues are more pronounced.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	Not directly related to the scale of housing, but could be beneficial to some degree as new housing in areas with good access to opportunities for learning.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	✓	~	~	Marginal benefits to construction industry from more housing. Growth may support development of business sites, particularly if mixed-use. Also, new housing, especially in Bexhill may support younger, skilled people. This is mitigated by weak market for business growth to meet additional jobs need. Amended housing numbers may impact on employment land and retail provision. As regards employment land, the implications are likely to be modest, as provision is already made for as much new business floorspace as is likely to be capable of being needed to meet the economic potential of the area over the plan period. Significant further employment land allocations are unlikely to be taken up, although further housing does place added emphasis on securing mixed use developments wherever practicable to assist in maintaining the balance between homes and jobs. The 2013 SHMA concluded that the level of housing associated with the Baseline Scenario (Option B4) would to a degree work against the economic objectives of the two Councils to reduce unemployment, increase labour force participation, and reduce net out-commuting; the implication being that a lower level housing could be more beneficial in this respect. A lower level of housing provision than implied by the demographically driven baseline scenario could also meet the requirement for affordable homes.
7. Improve accessibility to services and facilities for all ages across the District	~	~	~	It is not the rate or quantum of development that affects this objective, but the location of development. SHLAA indicated a higher level of development could still be located in relatively accessible locations - Bexhill, Market Towns and larger villages with more services. Although arguably, higher levels of development would force development into slightly less accessible sites within these service centres.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	~	~	It is not the rate or quantum of development that affects this objective, but the location of development. SHLAA indicated a higher level of development could still be located in relatively accessible locations - Bexhill, Market Towns and larger villages with more services. Although arguably, higher levels of development would force development onto sites slightly less accessible to cultural and leisure facilities within these service centres.
9. Improve efficiency in land use and encourage the prudent use of natural resources	~	(X)	X	It is anticipated that additional housing will be mostly on greenfield sites.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	(X)	X	Scale of housing would inevitably have some negative effects on congestion, although existence of, and potential for, sustainable travel choices may mitigate this. Focus on Bexhill, together with Hastings Fringes and mainly villages with services, is consistent with this.
11. Reduce emissions of greenhouse gases	~	(X)	X	Scale of housing would inevitably result in higher emissions. Mix of areas anticipated to take larger scale of development, including larger sites in Bexhill and smaller sites in rural areas.
12. Minimise the risk of flooding and resulting detriment to people and property	~	~	(X)	Dependent more on location, SHLAA sites predominately avoid EA flood zones 2 and 3, but development still may worsen the risk of surface water run-off and will require careful planning at the site development level.
13. Maintain, improve and manage water resources in a sustainable way	~	~	(X)	Scale of housing previously accepted via South East Plan, although a 'water stress area', so inevitably some impact likely towards end of plan period. May be balanced to a limited extent by implementation of CISH.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	~	~	~	International nature conservation sites: These are the Dungeness and Rye Bay "complex" of designations and the Pevensy Levels. The Appropriate Assessment under the Habitats Regulations carried out for the submitted Core Strategy did not raise serious issues of adverse impacts, except for the potential of the combined impacts of further development and tourism at the south-eastern parts of the District. More recent advice from the Council's environmental consultants is that the more limited increase in housing in the Rye area in particular should not be inconsistent with the wildlife interest of the Rye Bay area. The sustainable access strategy, previously highlighted to manage access to the international sites, is still important. In fact, this is currently being progressed with Shepway District Council. West Bexhill is within the hydrological catchment area of the Pevensy Levels and potential development would therefore require further investigation as outlined in the Option D4. Some more localised impacts inevitable given high bio-diversity interest in district, although should be capable to be managed. Prospect of cumulative impact over time. Balanced by fact that SHLAA identified several site-specific opportunities for habitat creation/enhancement alongside site development. Development sites have almost entirely avoided designated sites, BAP habitats and ancient woodland.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	~	(X)	(X)	Development locations assessed for impact on AONB and on individual villages/settings, and capable of additional housing with only limited adverse impacts, subject to detailed studies, but potential for greater cumulative impacts towards the middle and end of plan period with more housing.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	(X)	(X)	Some increase in waste generation, but limited by geographic focus of growth. Also, Waste Plan adopts sustainable management policies.
<b>Conformity with other policy/initiatives:</b> Largely supports government's agenda for housing growth.				
<b>Non-conformity:</b> Degree of conflict with AONB objectives.				

Overall Scale of Growth Option B4 – The 'Baseline Scenario'. A higher rate of development than previously directed by the SE Plan, in order to achieve the objectively assessed need of 6,180 dwellings - (an increase of +28.5% vis-à-vis the figure in the revoked South East Plan)				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home.	(✓)	✓	✓	The 2013 SHMA concluded that a lower level of housing provision than implied by the demographically driven baseline scenario could also meet the requirement for affordable homes.
2. Improve the health and well-being of the population and reduce inequalities in health	(✓)	(✓)	✓	There is a link between good quality, affordable housing and health and well-being.
3. Reduce crime and the fear of crime	(✓)	(✓)	✓	Facilitating access to housing of all sectors of society, including disadvantaged groups, may help reduce crime.
4. Reduce deprivation and social exclusion	(✓)	(✓)	✓	Easier access to housing may help reduce deprivation and social exclusion. This is beneficial with a higher proportion of housing in the coastal areas (Bexhill, Hastings Fringes, Rye) where these issues are more pronounced.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	Not directly related to the scale of housing, but could be beneficial to some degree as new housing in areas with good access to opportunities for learning.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	(X)	(X)	Marginal benefits to construction industry from more housing. Growth may support development of business sites, particularly if mixed-use. Also, new housing, especially in Bexhill may support younger, skilled people. This is mitigated by weak market for business growth to meet additional jobs need. Amended housing numbers may impact on employment land and retail provision. As regards employment land, the implications are likely to be modest, as provision is already made for as much new business floorspace as is likely to be capable of being needed to meet the economic potential of the area over the plan period. Significant further employment land allocations are unlikely to be taken up, although further housing does place added emphasis on securing mixed use developments wherever practicable to assist in maintaining the balance between homes and jobs. The 2013 SHMA concluded that the level of housing associated with the Baseline Scenario would to a degree work against the economic objectives of the two Councils to reduce unemployment, increase labour force participation, and reduce net out-commuting; the implication being that a lower level housing could be more beneficial in this respect. A lower level of housing provision than implied by the demographically driven baseline scenario could also meet the requirement for affordable homes.
7. Improve accessibility to services and facilities for all ages across the District	~	~	(X)	It is not the rate or quantum of development that affects this objective, but the location of development. SHLAA indicated a higher level of development could still be located in relatively accessible locations - Bexhill, Market Towns and larger villages with more services. Although arguably, higher levels of development would force development into slightly less accessible sites within these service centres, an effect exacerbated by higher levels of growth.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	~	(X)	It is not the rate or quantum of development that affects this objective, but the location of development. SHLAA indicated a higher level of development could still be located in relatively accessible locations - Bexhill, Market Towns and larger villages with more services. Although arguably, higher levels of development would force development onto sites slightly less accessible to cultural and leisure facilities within these service centres. The negative effect may be exacerbated by higher levels of growth.
9. Improve efficiency in land use and encourage the prudent use of natural resources	(X)	(X)	X	It is anticipated that additional housing will be mostly on greenfield sites.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(X)	(X)	X	Scale of housing would inevitably have some negative effects on congestion, although existence of, and potential for, sustainable travel choices may mitigate this. Focus on Bexhill, together with Hastings Fringes and mainly villages with services, is consistent with this.
11. Reduce emissions of greenhouse gases	(X)	(X)	X	Scale of housing would inevitably result in higher emissions. Mix of areas anticipated to take larger scale of development, including larger sites in Bexhill and smaller sites in rural areas.
12. Minimise the risk of flooding and resulting detriment to people and property	~	(X)	(X)	Dependent more on location, SHLAA sites predominately avoid EA flood zones 2 and 3, but development still may worsen the risk of surface water run-off and will require careful planning at the site development level.
13. Maintain, improve and manage water resources in a sustainable way	~	~	(X)	Scale of housing previously accepted via South East Plan, although a 'water stress area', so inevitably some impact likely towards end of plan period. May be balanced to a limited extent by implementation of CISH.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	~	~	~	Some impacts inevitable given high bio-diversity interest in district, although should be capable to be managed. Prospect of cumulative impact over time. Balanced by fact that SHLAA identified several site-specific opportunities for habitat creation/enhancement alongside site development. Development sites have almost entirely avoided designated sites, BAP habitats and ancient woodland.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	~	(X)	X	Further increase in housing in the AONB and on top of settlement expansion under Option B3 means greater and increasingly significant impacts on the AONB and on individual settlements/settings.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	(X)	(X)	Some increase in waste generation, but limited by geographic focus of growth. Also, Waste Plan adopts sustainable management policies.
<b>Conformity with other policy/initiatives:</b> Supports government's agenda for housing growth.				
<b>Non-conformity:</b> Increasing likelihood of significant conflict with AONB objectives.				

## 6.2 Option (B) District Wide Scale of Growth: Commentary and Summary

### Previous District Wide SA Assessment in context of SE Plan

6.2.1 The 'Jan'13 Mods SA' considered the Option B1a 'Achieve the equivalent of the South East Plan scale of housing up to 2028'. At that point in time, the South East Plan, prepared by the then Regional Assembly and approved by the Secretary of State following independent examination, provided the basis for district housing targets. Its distribution of housing was based on the potential for sustainable growth across the region and in its constituent 'housing market areas' (HMAs). It was noted that Rother and Hastings were considered together to form a discrete HMA. Locally, the housing target took account of the poor economic performance of the Sussex Coast, and especially Hastings and Bexhill, and concluded that economic regeneration was the priority (and that housing growth should be consistent with supporting economic growth). It also recognised that, for the rest of Rother, the potential for growth is constrained by its Area of Outstanding National Beauty (AONB) designation. Hence, the SE Plan housing target for Rother (and Hastings) was less than the market may have sought. This was largely balanced in the South East Plan by higher levels of growth in more buoyant, accessible and less constrained areas, such as Ashford and the Thames Gateway.

### NPPF Context and 'Objectively Assessed Need'

6.2.2 With the South East Plan revoked, the National Planning Policy Framework (NPPF) provides the basis for determining housing provision. This requires that local planning authorities meet the 'full, objectively assessed need for market and affordable housing in the housing market area, 'as far as is consistent with the policies set out in this Framework'. The consequence of this is significant. Whereas the South East Plan distributed an annual average of 280 dwellings per year to Rother (and 210 dwellings per year to Hastings), it is clear that household projections indicate a higher requirement.

6.2.3 The Local Plan Core Strategy Inspector has written to the Council making reference to the NPPF and the South East Plan's revocation, as well as some further matters. In this correspondence, which is viewable at the following link <http://www.rother.gov.uk/corestrategy-examination> on the Council's website; she advised that the Council should revisit its assessment of housing need in the light of the even greater weight now given to the NPPF and to meeting current objectively assessed need; and that Rother District Council and Hastings Borough Council need to work together to establish the 'objectively assessed need' and explore the option of accommodating this to its logical conclusion (i.e. as far as is consistent with policies in the NPPF), if necessary seeking help from other Councils under the Duty to Co-operate. The Inspector's advice must be seen as reflecting current Government policy and requires consideration of higher housing numbers in the Sustainability Appraisal.

## Capacity for Housing Growth in the District

6.2.4 The substantive issue is the capacity to substantially increase housing growth in the District in infrastructure, economic, social and environmental terms. Going forward, as the scrutiny of the South East Plan showed, the Rother (and Hastings) area is not well suited, certainly compared to many other parts of the region, to high, migration-led, housing growth. Having looked at overall sustainability implications, the whole basis of the earlier work on the Core Strategy (including proposed modifications), essentially confirmed the conclusions of the South East Plan. It was also notable at the Core Strategy Examination Hearings, that even developer-led objections generally only sought modest increases in housing provision, broadly in-line with the South East Plan.

6.2.5 However, there is undoubtedly an increased policy emphasis from a national level downwards on 'economic' factors. Sustainability Appraisal is inherently a balance of environmental, social and environmental factors. Whilst previous conclusions may remain substantially similar, the relative weight given to them has to, by necessity, be governed to some extent by the parameters of national policy in which the Core Strategy exists.

6.2.6 Therefore, the Council has taken on board the Inspector's advice and produced further evidence work that is consistent with the NPPF, most notably an updated SHLAA and SHMA, as outlined earlier. In summary, the key findings of these pieces of work are:

- There is potential within the district to increase the amount of new housing over that previously agreed in January but that the sustainable level of growth is most likely to be some 5,700 net additional dwellings. Indeed, this figure is subject to the outcome of outstanding work to determine if Bexhill is able to accommodate this in transport terms. (assessed by SA Option B3)
- The housing needs for market and affordable housing for Rother District, in terms that meet all the criteria of the National Planning Policy Framework, is 6,180 net additional dwellings over the period 2011-2028 (assessed by SA Option B4)

6.2.7 The fact that this work suggests there may be further housing potential, necessitates further Sustainability Appraisal assessments (options B3 and B4)

## District-Wide Sustainability Factors

6.2.8 The sites-based approach to identifying development potential (via the SHLAA) needs to be reviewed in relation to the cumulative implications for the settlement, and the District as a whole, on a number of factors critical to achieving sustainable development, notably as set out in the table below:

	<b>NPPF references</b>
<b>Compatibility with the Vision and Strategic Objectives</b>	Realising a community's positive vision for the future of their local area is a core planning principle. (paragraph 17)
<b>Accordance with the Settlement Pattern and Strategy</b>	Need to take account of roles and characters of areas, promoting vitality of main urban areas, encouraging effective use of brownfield land, accessible locations, including villages with services (paragraphs 17, 55 ,38)
<b>Protection of International Nature Conservation Sites</b>	These enjoy strong protection by European Conventions. Adverse impacts have to be justified in the national interest (paragraphs 113, 117, 118, 14)
<b>Conservation of the landscape and scenic beauty of the AONB</b>	AONBs (and National Parks) have the highest status of protection in relation to landscape and scenic beauty, to which great weight should be given. (paragraph 115, 116, 14)
<b>Capacity of Critical Infrastructure- Transport</b>	Reduce the need for travel, give choice as to mode ensure provision of viable infrastructure, access whether improvements to the network can limit significant development impacts (paragraph 29, 31, 32)
<b>Capacity of Critical Infrastructure- Water supply</b>	Take full account of water supply, as well as flood risk and coastal change (paragraphs 94, 99 and 156 and 162)
<b>Deliverability</b>	Local Plans should be aspiration but realistic (paragraph 154)

6.2.9 While these factors apply to some degree across different geographies, but the key overall factors are as follows

6.2.10 Vision and Strategic Objectives: The Core Strategy's vision has been developed with the Local Strategic Partnership and is regarded as fairly reflecting the priorities of local people and businesses.

6.2.11 Main points arising from an appraisal of further growth against the Vision are:

- a) Further housing may assist in developing 'balanced communities' if it further encourages younger people to live locally;
- b) While housing can assist the key objective of economic growth, the Assessment of Housing Needs notes that a lower level of housing would actually provide greater opportunities for the local workforce to be employed, increased economic activity and working locally;
- c) Further housing would more readily meet the need for affordable housing for local people although, again, a somewhat lesser level should also achieve this;
- d) There are increasing incompatibilities of higher housing numbers with conservation of the area's outstanding environmental assets (see below).

6.2.12 International nature conservation sites: These are the Dungeness and Rye Bay “complex” of designations and the Pevensy Levels. The Appropriate Assessment under the Habitats Regulations carried out for the submitted Core Strategy did not raise serious issues of adverse impacts, except for the potential of the combined impacts of further development and tourism at the south-eastern parts of the District. Advice from the Council’s environmental consultants is that the more limited increase in housing in the Rye area should not be inconsistent with the wildlife interest of the Rye Bay area. The sustainable access strategy, previously highlighted to manage access to the international sites, is still important. In fact, this is currently being progressed with Shepway District Council. Significant growth on the western and northern fringes of Bexhill was previously tested, so no material additional impacts are envisaged, although they will require further assessment alongside Site Allocations work.

6.2.13 High Weald Area of Outstanding Natural Beauty: There is a statutory obligation to have regard to the conservation of the High Weald AONB; the ‘great weight’ to be given to this in national policy reflects this duty. In terms of the overall scale of housing, it is notable that the scale of housing now proposed in the inland parts of the District is higher than that deemed appropriate by the Panel examining the South East Plan. It is very difficult to prescribe a “carrying capacity” of the landscape. Rather, in undertaking the review of development potential in the AONB, and following discussion with AONB officers, use has been made of data identifying key landscape features as well as information about the historical development, and typology, of settlements. These have complemented the area-based landscape assessments (previously carried out by the County Council’s Landscape Group) and site surveys. As may be implied from the additional development potential identified in the SHLAA Update, there will inevitably be some sites where (subject to further investigation) development may cause a degree of harm to the AONB setting of settlements, but not such harm as to prevent them being considered in order to help towards boosting the supply of housing. Nevertheless, the cumulative implications of further activity, and populace, in the AONB will impact on its character. To mitigate these, maintaining the settlement pattern, the character of settlements and the tranquility of more remote locations have all been considered.

6.2.14 Water supply: Water in Rother is supplied by two companies - Southern Water and South East Water. Their plans to ensure that there is a sufficient supply of water to meet the anticipated demands are set out in their respective Water Resources Management Plans. Both companies have recently published Draft Plans for consultation covering the period to 2039/40. These will be reported to Cabinet later this month. At this point, it is noted that underpinning both draft Water Management Plans is demand forecasting. Future forecast of population and property numbers have been provided by expert demographic consultants, Experian, based on a combination of current policy and trend-base projections. Initial investigation is that these assume increases of a little over 8,000 more dwellings in the Rother/ Hastings area up to 2030. This is marginally less than the housing growth now being proposed by the two Councils. While this situation needs to be drawn to the attention of the water

companies through the consultation process, to ensure that housing targets can be accommodated, both South East Water and Southern Water have advised that they are in the process of updating their figures to reflect the results of the 2011 Census.

### Sustainability Appraisal Options

#### *Option B3 (preferred)*

6.2.15 5,700 net additional dwellings would still be somewhat (8%) less than the assessed housing needs. However, it would achieve local housing and economic objectives, given the substantial environmental, economic, infrastructure and, to some extent, housing market limitations, the net addition of at least 5,700 homes is still a challenging target.

6.2.16 The implied annual average build rate over the plan period (2011-2028) of 335 dwellings a year compares to an average 235 dwellings a year over the last 22 years, since 1991. Hence, it should be recognised that this level of growth does represent a real contribution to significantly boosting housing supply, as sought by the Framework. Furthermore, it will provide for at least 1,000 more dwellings than that which was required under the South East Plan.

6.2.17 If the upper end of the ranges for Rye, Battle and the Hastings Fringes are taken, then the total provision would be 5,920 dwellings. Given that there is a prospect of further development coming forward on large windfall sites (although this cannot be readily estimated at this point), then there is the realistic prospect of the objectively assessed housing needs being met, in practice (subject to confirmed capacity at Bexhill) over the plan period.

6.2.18 While the actual figures total 5,700-5,920 new homes, the upper level is subject to some significant uncertainties, such that it is considered that they could not reasonably be relied upon to come forward. Hence, the housing target of “at least” 5,700 dwellings is favoured. It is still considered right to highlight these additional potential sources which could boost eventual supply.

#### *Option B4*

6.2.19 The figure of 6,180 is derived from the 2013 SHMA, but also it is notably very close to the maximum capacity (6,139) identified in the 2013 SHLAA review.

### Conclusions

6.2.20 To conclude, the sustainable level of growth is most likely to be some 5,700 net additional dwellings. Although this figure is subject to the outcome of outstanding work to determine if Bexhill is able to accommodate this in transport terms. The figure is more than the Council had argued at the 2012 Examination was the housing need for the District. This is because the consultants appointed to advise the Councils believe that greater weight should be given to trend-based demographic projections to be in line with the NPPF, while the Council previously took the view that the strategic need for economic im-

provement, which is not regarded as contingent on such housing growth, should take primacy.

6.2.21 The Sustainability Appraisal concludes that there is more potential for sustainable growth than previously planned, but notes that this is increasingly impacting on fulfilling some objectives, notably in relation to conservation of the AONB, increasing job opportunities and realising local aspirations. The proposed balance in meeting diverse objectives, including boosting housing, is considered about right.

6.2.22 As well as likely leaving a slight shortfall of new housing against the District's identified housing needs, there will inevitably still be a shortfall against identified need across the housing market area, as Hastings is not able, essentially for physical capacity reasons, to accommodate its needs.

6.2.23 Central to these conclusions is the acceptance of the weight that the Government is giving to boosting house building as part of its economic strategy. Accordingly, these recommendations duly give more weight to housing provision than has previously been the case. Were it not for this housing need, the previously approved levels of growth were, and are, regarded as consistent with the local visions set out in the Strategy. Housing need is a legitimate and genuine need though, warranting due consideration.



## Option (D) Bexhill Scale of Growth

Bexhill Scale of Option D4: A higher rate of growth in recognition of changed circumstances, equating to 3,100 net additional dwellings (average of 182 p/a)				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	✓	✓	✓	This option would result in more dwellings being constructed than assumed in previous SA assessments of Bexhill scale of growth. However, Appendix 4 of the 2013 SHMA implies a local housing need for Bexhill of around 2,600 based on meeting affordable housing needs. Therefore, in terms of meeting local need, this option offers relatively little advantage over previously assessed SA Option D1a (which already marginally exceeded this figure). However, it would offer some additional benefit in terms of meeting the demand for housing in the wider area.
2. Improve the health and well-being of the population and reduce inequalities in health	(✓)	(✓)	(✓)	The assessment reflects the link between good quality affordable housing and health and well-being, and the benefit of increased supply to those having difficulty accessing housing.
3. Reduce crime and the fear of crime	(✓)	(✓)	(✓)	Facilitating access to housing of all sectors of society, including disadvantaged groups, may help reduce crime.
4. Reduce deprivation and social exclusion	(✓)	(✓)	(✓)	Generally, easier access to the housing market may help reduce deprivation and social exclusion. The progress on the Link Road and development at North East Bexhill increases benefits, although some uncertainty over capacity for economic growth to match housing growth, with knock-on implications for deprivation and social exclusion. This may be mitigated by phasing development, if necessary, to secure a balance between homes and jobs.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	(x)	(x)	(x)	Likely to result in higher levels of development in locations less accessible to key higher education facilities.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	~	(x)	Further housing, as identified in the SHLAA, (of up to 3,330 additional homes) would be expected to facilitate additional employment land releases, although the economy is unlikely to grow to a sufficient extent to provide a high level of employment. Marginal benefits to construction industry from more housebuilding. Generally growth will support regeneration, although limited capacity to grow economy quickly means that more houses may not complement regeneration goal, but instead reinforce retirement and deprivation characteristics of the respective towns.
7. Improve accessibility to services and facilities for all ages across the District	~	~	~	It is not the rate or quantum of development that affects this objective, but the location of development. Enhanced facilities and services would result from further development, although this was also envisaged to take place anyway in the assumptions of the previous assessments of lower levels of development for Bexhill. A higher rate of housing development may also increase the catchment for services and facilities. However, a higher rate of development may arguably lead to development directed to less accessible, and more wholly residential, locations within the town.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	~	~	It is not the rate or quantum of development that affects this objective, but the location of development. A higher rate of housing development may also increase the catchment (and demand) for cultural and leisure activities, and hence stimulate and facilitate activity. However, a higher rate of development may arguably lead to development directed to less accessible locations within the town, less well related to existing cultural and leisure facilities, particularly higher order facilities in Hastings.
9. Improve efficiency in land use and encourage the prudent use of natural resources	~	~	~	Additional housing may be of a scale to support the full range of renewable energy options. However this will depend upon the scale as well as layout and land use mix of the additional development.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	(x)	(x)	Questions remain regarding the capacity of the transport network to accommodate further development. The associated additional traffic would put pressures on certain parts of the highway network. That would require mitigation through both layout and design and improvements to facilities for sustainable travel. More potential to address this exists via larger 'sustainable urban extensions' rather than un-planned and ad-hoc development.
11. Reduce emissions of greenhouse gases	x	x	x	Greater scale of development would inevitably result in higher emissions.
12. Minimise the risk of flooding and resulting detriment to people and property	~	~	~	Without knowing the more specific siting of development, this is hard to assess. However there are relatively few areas that are at risk of flooding in and around Bexhill generally, while there are opportunities to avoid flood risk areas and mitigate any impacts of development in the identified broad locations.
13. Maintain, improve and manage water resources in a sustainable way	(x)	(x)	(x)	Higher rate of development would require more water resources, although there are increasing expectations to manage resources more effectively. A higher level of development, or increased likelihood of development than previously anticipated, would underline the importance of referencing the previous HRA assessment. Pevensey Levels Appropriate Assessment (September 2010) notes that West Bexhill is within the hydrological catchment area of the Pevensey Levels. It further comments that development within the hydrological catchment area of the Pevensey Levels Ramsar Site would create an increase in impermeable surface, which would ultimately result in increased surface water run-off and increased pollutant loads. In turn, this has the potential to significantly affect the hydrology, soil and flora and fauna of the Pevensey Levels, and ultimately affect the Conservation Objectives of the site. Based on their assessment of the Core Strategy (Consultation on Strategy Directions) the AA stated that if its recommendations for mitigation are followed the Rother District Council Core Strategies will not have an adverse effect on the Pevensey Levels Ramsar site. In light of the commentary of the AA and in view of the absence of any confirmed allocation or permission detailing mitigation, the possibility of minor adverse impacts has to be acknowledged. The AA recommends that for the Core Strategy, there are three measures that will manage impacts of development on the Pevensey Levels to an acceptable level: - A commitment to implement SuDS; - managing levels of development within the current consented capacity of waste water treatment works; and - implementing water efficiency measures. Further assessment work for the Site Allocations DPD will include: - The identification of appropriate SuDS techniques to mitigate surface water and water quality concerns - Analysis of the results from the Review of Consents - Analysis of Waste Water issues and Southern Water's research, should it be available, on a new location for a WwTW if necessary. Impact on water resources and levels will be an important consideration if it is necessary for flows are to be diverted.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	(x)	(x)	(x)	Higher rate of development may inevitably have a negative impact in terms of loss of natural habitat. However development can also provide opportunities for habitat creation and restoration which would need to be further explored at site allocations stage to mitigate the impact.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	~	(x)	(x)	None of the areas proposed for housing are within the AONB. A higher rate of development may have a negative impact in terms of loss of the natural environment. However development can also provide opportunities for landscape enhancement which would need to be further explored at site allocations stage to mitigate the impact.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	(x)	(x)	x	Higher levels of development will result in higher levels of waste generation, although sustainability of method of disposal is also key.
<b>Conformity with other policy/initiatives:</b> Supports NPPF growth agenda and will contribute substantially to the Government's policy to significantly boost house building. This higher level of house building may also contribute to the priority for regeneration, particularly if it enables more employment land to come forward and supports a higher level of economically active population.				
<b>Non-conformity:</b> Weak economic growth means that more housing may increase the pressure on available jobs, which in turn could make housing more attractive to economically inactive people, impacting on the potential for economic growth and the vision for the town.				

### 6.3 Option (D) Bexhill Scale of Growth: Commentary and Summary

- 6.3.1 As the largest settlement in the District, Bexhill is already identified as being the strong focus of development. Bexhill is the principal town within Rother and is largely unconstrained by environmental designations, unlike majority the rest of the District which is part of the High Weald Area of Outstanding Natural Beauty (AONB). Consideration of a further, higher option for housing growth within Bexhill is tested under option D4.
- 6.3.2 Aside from the local view, (expressed in the early residents' questionnaire) that growth of the town should not be too great as to change its character, particular factors exist that constrain growth in relation to the capacity of the transport network and the deliverability of development. Whilst the Link Road is now approved, and is currently under construction, the overall scale of growth at Bexhill was tested through further transport modelling to determine overall transport capacity within the town. The SA is based on the town's transport network will be nearing and, in places, at capacity towards the end of the plan period, but that capacity may be managed depending on the scope of demand management and potential junction improvements (including signalling), as well as on the location and form of development.
- 6.3.3 The vision for the area seeks to create a more vibrant town and aims to maintain and improve the balance between homes and jobs is important in order to meet the objective of fostering a more balanced demographic profile, particularly in attracting higher proportions of economically active people to the town. Further housing, as identified in the SHLAA, (of up to 3,330 additional homes) would be expected to facilitate additional employment land releases..
- 6.3.4 The supplementary report to the SHMA Update prepared by the Council's housing consultants looks at potential 'Housing Delivery in Bexhill and Hastings'. This concludes that:

*'There are also concerns about the overall capacity of the Bexhill market to absorb new homes. A number of benchmarks would indicate that it will be challenging to consistently deliver more than 200 homes pa, year in year out, both because of market capacity; and the potential impact on sales values of new homes, if the market is relatively oversupplied – since this will act as a deterrent to high volumes of new building.'*

## Option (E) Hastings Fringes Scale of Growth

Option E2: A higher level of residential development (100-250 dwellings) in recognition of changed circumstance				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	~	~	✓	Development at Breadsell could potentially result in some 150 dwellings (plus some potential for employment floorspace) in Rother District. However, proposals for associated development which could be of the order of a further 600 dwellings in Hastings Borough to the south, has since been removed from the Core Strategy (HBC Cabinet Report 01/03/10). By implication, the provision of less homes may result in a weaker score against this SA objective (and much weaker against other objectives - see below). Breadsell may possibly come forward in the latter part of the plan period, alongside the development of the larger portion of the site in neighbouring Hastings, as there are significant uncertainties limiting early developability.
2. Improve the health and well-being of the population and reduce inequalities in health	~	~	✓	There there is a link between good quality affordable housing and health and well-being. Breadsell site is close to Hastings Hospital.
3. Reduce crime and the fear of crime	~	~	(✓)	Facilitating access to housing of all sectors of society, including disadvantaged groups, may help reduce crime. The affects are marginal, but by implication less overall housing may increase social exclusion which may have a negative effect on crime.
4. Reduce deprivation and social exclusion	~	~	(✓)	Easier access to the housing market may help reduce deprivation and social exclusion, although benefits may be nullified in inaccessible locations.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	~	?	Adequately located to maximise opportunities in terms of relative proximity to Colleges and Hastings University, but access to primary education depends upon whether a school is incorporated in a scheme. If not, it would be a 'X'.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	~	?	Development at Breadsell could include employment floorspace. While this would be a benefit, it is not relied upon and is currently uncertain.
7. Improve accessibility to services and facilities for all ages across the District	(x)	(x)	?	If the Rother part of the site was developed in isolation it would not offer local shops and services. It would however be served by a bus service on the Hastings Road, although this is infrequent (twice a day). The longer-term prospect of sustainability against this objective will depend on whether such services are incorporated in a scheme. If not, it would be a 'X'.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	~	~	Although on edge of Hastings, both Breadsell relatively inaccessible locations far from cultural and leisure facilities.
9. Improve efficiency in land use and encourage the prudent use of natural resources	~	~	(x)	Sustainable resource management potentials are unclear, but would inevitably utilise greenfield land.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	x	x	?	Development would compound existing and projected congestion issues at the nearby Baldslow junction area. These are most unlikely to be resolved in the short-medium term. However, measures are being investigated for improvement in the longer term.
11. Reduce emissions of greenhouse gases	~	~	?	Potential for addressing this issue unclear, but development could have a negative effect, but this may be balanced if renewable energies are incorporated.
12. Minimise the risk of flooding and resulting detriment to people and property	~	~	~	Site not at risk from flooding.
13. Maintain, improve and manage water resources in a sustainable way	~	~	?	Unclear what impact is, but development will have impact on water resources.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	x	x	x	Natural England has objected to development, being highly concerned about the nature and location adjacent to Marline Valley Woods SSSI. As such, any application for housing in this area has the potential to adversely effect the SSSI in the following ways; 1. Hydrological Impact – Impacts of the quality and quantity of water feeding into the gill streams within the woodland. These support nationally important bryophyte assemblages within the SSSI. 2. Increased visitor disturbance 3. Fragmentation of the SSSI – severing biodiversity links to the wider environment, isolating genetic reserves of flora and fauna."  In terms of the SA, it is therefore considered that the inclusion of Breadsell (and hence the upper end of the range) would inevitably score more negatively vis-a-vis this SA objective. The scoring is effectively a risk assessment at the current time, but could change if further investigations were able to demonstrate satisfactory mitigation measures could be achieved. The lower end of the range (100) would be much less likely to have a significant impact. Loss of green space in close proximity to SNCI to north and not far from SSSI and LNR to south. As such, Breadsell represents a valuable green corridor link.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	(x)	(x)	(x)	Crucially, development would result in a significant erosion of the Strategic Gap between Hastings and Battle. It is also relatively exposed landscape. In terms of the SA, it is therefore considered that the inclusion of Breadsell (and hence the upper end of the range) would inevitably score more negatively vis-a-vis this SA objective. The lower end of the range (100) would be much less likely to have a significant impact
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	~	(x)	Higher levels of development will result in higher levels of waste generation, although sustainability of method of disposal is also key.
<b>Conformity with other policy/initiatives:</b> Potentially contributes towards housing numbers and need.				
<b>Non-conformity:</b> Clear non-conformity if land at Breadsell developed in short term, due to issues with SA Objectives 7, 10, 14 and 15 in particular, but these impacts are not certain in longer term.				

## **6.4 Option (E) Hastings Fringes Scale of Growth: Commentary and Summary**

- 6.4.1 The previous SA of Hastings Fringes assessed a level of 200-450 dwellings, but concluded a lower level of dwellings was more appropriate. At 'Consultation on Strategy Directions' stage, there was consideration of development in association with a new Wilting Station as well as scope for a comprehensive development at Breadsell Farm. Their inclusion largely explains the much higher number (200-450) previously discussed for the Hastings Fringes.
- 6.4.2 The former has since been removed from the strategy as the station was unviable and for sustainability reasons. Breadsell Farm, which straddles the administrative boundary, mainly in Hastings but with a road frontage in Rother, has been the subject of recent consideration through the Hastings Core Strategy examination.
- 6.4.3 At proposed submission stage of the Rother Core Strategy, the Breadsell site had been removed from the strategy. The document referred to just 45-80 dwellings, being confined to other smaller scale opportunities in the Hastings Fringes area. It was considered that since Breadsell was effectively no longer part of Hastings BC considerations, that the much smaller development in Rother was not sustainable, particularly as it would be unlikely to incorporate local services at a small scale. Background evidence in the form of the SHLAA 2010 indicated a relative lack of alternative sustainable development opportunities in the Hastings Fringes area that are of a strategic scale, which added further doubt as to the achievability of the previously identified levels of development.
- 6.4.4 An updated review of the existing evidence base of development potential on the fringes of Hastings in Rother district has essentially confirmed that development of a strategic scale is limited. The only real potential for the outward growth of Hastings that would not have direct and substantial impact on the High Weald AONB setting of the town that remains is the Breadsell Farm area on the south side of Battle Road. However, this could only be considered sustainable in-conjunction with associated mixed-use development within Hastings Borough, which incorporates local services. Development at this location is dependent on a satisfactory solution to the congestion problems in the Baldslow area and is therefore unlikely to come forward in the short-medium term.
- 6.4.5 Hastings Borough Council's position is that it is not allocated for development because of unresolved objections by Natural England regarding its impact on the Marline Valley SSSI, as well as other sustainability concerns. Notwithstanding this, the Hastings Plan does not rule out a comprehensive mixed-use development proposal should Natural England's objections be overcome and it be satisfactorily demonstrated that the local highway network could cope.

- 6.4.7 Therefore, and although this is not considered to represent a reasonable prospect of development at this time, as it could represent a rare opportunity for sustainable development (if planned comprehensively) outside the AONB, it is considered appropriate to not rule it out; hence, the range in the SHLAA.
- 6.4.8 It is not considered that the Rother portion would constitute a sustainable development in isolation from substantial development in Hastings Borough Council area. Equally, were the Hastings development to proceed, there would be little justification for not developing the Rother section alongside since is arguably the less sensitive portion of the site and would be necessary to provide access to the wider area.
- 6.4.9 As outlined in the table, the inclusion of Breadsell raises issues with SA Objectives 10, 14 and 15 in particular. These have to be balanced against the economic and social benefits of providing new housing.
- 6.4.10 Addressing acknowledged constraints is likely to mean that, even if development could come forward, it is unlikely to be in the first 10 years of the plan period.

## Option (F) Battle Scale of Growth

### Battle Option 3: A higher rate of residential development in recognition of changed circumstances, 475-500 dwellings over the period 2011-2028 (equating to 29 dwellings p/a).

Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home.	✓	✓	✓	Provides higher quantum of housing in response to identified needs.
2. Improve the health and well-being of the population and reduce inequalities in health	✓	✓	✓	There is a link between good quality affordable housing and health and well-being.
3. Reduce crime and the fear of crime	( ✓ )	( ✓ )	( ✓ )	Facilitating access to housing of all sectors of society, including disadvantage groups, may help reduce crime.
4. Reduce deprivation and social exclusion	✓	✓	✓	Deprivation and social exclusion are not considered to be major issues for Battle. Redevelopment opportunities that may be associated with this option should aim to reduce deprivation and social exclusion.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	?	?	?	Previous assumptions that levels of growth would secure/necessitate a new primary school are no longer the case following further advice from the Education Authority. However, the education allocation remains in place on the Blackfriars site and may potentially instead provide an early years facility.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	( ✓ )	( ✓ )	( ✓ )	Battle remains economically buoyant. There is no change proposed to the Core Strategy expectations of continued economic growth.
7. Improve accessibility to services and facilities for all ages across the District	( ✓ )	( ✓ )	( ✓ )	Battle is relatively accessible compared to other locations within the District. Higher potential with development boundary may support accessibility further. Options for pedestrian and cycle access routes should be considered a priority.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	( ✓ )	( ✓ )	A higher rate of housing development, particularly in areas rich in culture, may also increase the catchment (and demand) for cultural and leisure activities, and hence stimulate and facilitate activity.
9. Improve efficiency in land use and encourage the prudent use of natural resources	( X )	( X )	( X )	Some greenfield development required, although relative to other settlements in the District, a high proportion of potential has been identified within the existing development boundary.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	( X )	( X )	( X )	Congestion in the central High Street is an issue for Battle, which may inevitably be exacerbated by higher levels of development. Identification of a number of options close to the town centre may limit the propensity to travel by private car. Options for pedestrian and cycle access routes should be considered a priority.
11. Reduce emissions of greenhouse gases	( X )	( X )	( X )	Likely to be a negative impact on emissions from development, notwithstanding the increasingly demand standards of the Code for Sustainable Homes.
12. Minimise the risk of flooding and resulting detriment to people and property	✓	✓	✓	Battle does not have areas at risk from EA flood zones 2 and 3 – so new development associated with this option would help to minimise the risk of flooding and resulting detriment to people at a District level.
13. Maintain, improve and manage water resources in a sustainable way	?	?	?	All new development should be built with water efficiency in mind. Unclear at this stage whether there will be any issue with water supply or treatment.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	( X )	( X )	( X )	Higher rate of development may inevitably have a negative impact in terms of loss of natural habitat. However development can also provide opportunities for habitat creation and restoration which would need to be further explored at site allocations stage to mitigate the impact to compensate for habitat loss due to development.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	( X )	( X )	( X )	Greater scale of house building comes with the risk of greater impact on landscape on townscape.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	( X )	( X )	( X )	Greater scale of house building will almost certainly result in greater level of waste generation.

**Conformity with other policy/initiatives:** Higher housing growth responds to NPPF emphasis on housing growth.

**Non-conformity:** Raises some issues, particularly in relation to infrastructure, congestion and environmental impacts.

## 6.5 Option (F) Battle Scale of Growth: Commentary and Summary

- 6.5.1 In terms of the overall vision, the key issue is the ability for the town to grow while at the same time retaining its historic character and setting. There is no doubt that this imposes limits to growth, but the SHLAA has revealed that there are sites across the town the development of which, while having some local impact on the AONB setting, could be developed (subject to further assessment) in line with the development strategy for the Town to distribute development, not least to balance transport movements.
- 6.5.2 The previous PSCS SA of Battle options assessed a slightly lower level of development (24 dwellings per annum, as opposed to 29 here), but concluded that 24p/a was appropriate and achievable. Given the change in circumstances described in this report, a higher level still requires evaluation. The higher level is 475-500 dwellings over 2011-2028, which equates to 29 dwellings per annum.
- 6.5.3 The following matters regarding the assessment have altered since the previous assessment.
- 1) A recognition that higher levels of house building may not impact as negatively on landscape and environmental concerns as previously thought. This is due to the 2013 SHLAA identifying a high proportion of potential within the built envelope via 'broad locations', and identifying more discrete sections of greenfield sites where impacts may be more limited. However, the reliance on broad locations brings less assurance of delivery.
  - 2) For reasons outlined in more detail elsewhere in the SA, essentially relating to national policies giving increased emphasis to the priority of housing growth to meet national and local needs, the relative balance between SA objectives needs to be taken into consideration.
- 6.5.4 While Battle has a relatively buoyant market, this is considered the limit of sustainable growth. Apart from AONB impacts, there are infrastructure issues that require further attention, notably in relation to education and traffic capacity around this scale of development. These will require further investigation, although they are not believed to be "showstoppers" to the level of development now proposed.

## Option (G) Rye and Rye Harbour Scale of Growth

**Option G3: A slightly higher level of residential development, 355-400 (equating to 22 p/a) dwellings in recognition of changed circumstances.**

Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	✓	✓	✓	Will result in new housing in line with code for sustainable homes and RDC affordable housing policies.
2. Improve the health and well-being of the population and reduce inequalities in health	✓	✓	✓	There is a link between good quality affordable housing and health and well-being.
3. Reduce crime and the fear of crime	(✓)	(✓)	(✓)	Facilitating access to housing of all sectors of society, including disadvantage groups, may help reduce crime.
4. Reduce deprivation and social exclusion	✓	~	~	Easier access to the housing market may help reduce deprivation and social exclusion. Deprivation may worsen if reduction in economic base.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	No clear link.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	(x)	(x)	Marginal benefits in higher housebuilding for construction industry. Likely to be loss of employment floorspace, especially with higher levels of housing.
7. Improve accessibility to services and facilities for all ages across the District	?	?	?	Rye is relatively accessible compared to other locations within the District. Accessibility may depend more on individual sites.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	(✓)	(✓)	A higher rate of housing development, particularly in areas rich in culture, may also increase the catchment (and demand) for cultural and leisure activities, and hence stimulate and facilitate activity.
9. Improve efficiency in land use and encourage the prudent use of natural resources	(x)	(x)	(x)	More housing and land take will entail greater use of natural resources.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(x)	(x)	(x)	Larger scale of development will come with greater number of transport movements. In terms of air quality, the most relevant roads in Rother with relation to the Dungeness SAC/Dungeness to Pett Level SPA and future SPA extension and Ramsar site are the road linking Winchelsea and Rye (Royal Military Road) and that linking Rye to Rye Harbour, both of which lie within 200m of Rye Harbour LNR. However, air quality impacts were screened out in the 2008 HRA screening report given the small amount of development planned for the Rye/Rye Harbour area and this conclusion was accepted by Natural England.
11. Reduce emissions of greenhouse gases	(x)	(x)	(x)	Likely to be a negative impact on emissions from development, notwithstanding the increasingly demand standards of the Code for Sustainable Homes.
12. Minimise the risk of flooding and resulting detriment to people and property	x	x	x	Rye area is almost wholly within flood zone, including most housing opportunities identified within the SHLAA.
13. Maintain, improve and manage water resources in a sustainable way	~	~	~	Around Rye, groundwater abstraction is from the Chalk aquifer or the Lower Greensand, neither of which are hydrologically connected to the interest features of Dungeness SAC or Dungeness to Pett Level SPA.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	(x)	~	~	Greater scale of house building comes with the risk of greater impact on biodiversity in what is a highly sensitive geographic area, although it is important to note even the higher level of development would be highly unlikely to result in the direct loss of important habitat. Impacts are therefore more likely to be indirect. The Appropriate Assessment under the Habitats Regulations carried out for the submitted Core Strategy did not raise serious issues of adverse impacts, except for the potential of the combined impacts of further development and tourism at the south-eastern parts of the District. Initial advice from the Council's environmental consultants is that the more limited increase in housing in the Rye area should not be inconsistent with the wildlife interest of the Rye Bay area. The sustainable access strategy, previously highlighted to manage access to the international sites, is still important. In fact, this is currently being progressed with Shepway District Council and therefore gives rise for more grounds for optimism than in the previous assessment of this matter. Positive aspects will be more particularly notable once it is implemented later in the plan period.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	(x)	(x)	(x)	Greater scale of house building comes with the risk of greater impact on landscape on townscape.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	(x)	(x)	(x)	Greater scale of house building will almost certainly result in greater level of waste generation.
<b>Conformity with other policy/initiatives:</b> Higher housing growth responds to NPPF emphasis on housing growth.				
<b>Non-conformity:</b> Raises new issues in relation to sustaining economic growth.				



## 6.6 Option (G) Rye and Rye Harbour Scale of Growth: Commentary and Summary

- 6.6.1. The strategic objective for Rye emphasises its economic and social well-being within a context of managing its historic character, vulnerability to flooding and internationally important ecological setting. Together, these considerations weigh against significant new development.
- 6.6.2. The SHLAA Update partly reflects these limitations to opportunities for significant outward growth. Of particular note, evidence presented to the Examination indicated that the prospect of relocation by the main business occupiers to enable residential-led redevelopment at Rock Channel (as provided for by the adopted Local Plan) is unlikely. The area is still retained as a 'broad location' in the SHLAA, to maintain the option, but the likely housing yield of Rock Channel is much reduced; in practice it may well not be forthcoming at all. Balancing this, is the identification of other potential opportunities for housing through redevelopment schemes. Further work is required, through the development of the proposed Neighbourhood Plan for Rye, to further investigate such possibilities.
- 6.6.3. It is reasonable to maintain a range of housing growth for the town, as it is clear that if redevelopment opportunities (on which a higher level of growth is based) do not all come forward, there is little or no potential for alternative sustainable outward growth. The range allows for a proportion of redevelopment capacity not being realised.
- 6.6.4. The previously SA'd Rye option G1 assessed the the 'Strategy Directions' level of development (amounting to 22.5 dwellings per annum), but concluded that a more cautious approach (approximating to 18 dwellings per annum) was more appropriate.
- 6.6.5. Given the change in circumstances described in this report, the higher level is again re-evaluated. The higher level is 355-400 dwellings over 2011-2028, which equates to 21 to 24 dwellings per annum.
- 6.6.6. The following matters regarding the assessment have altered since the previous Rye Assessment:
- 1) A recognition that higher levels of house building may impact negatively on SA Objective 6, since there may be loss from overall quantum of employment floorspace with higher levels of housing.
  - 2) A more positive assessment regarding SA Objective 14. Initial advice from the Council's environmental consultants is that the more limited increase in housing in the Rye area should not be inconsistent with the wildlife interest of the Rye Bay area. The sustainable access strategy, previously highlighted to manage access to the international sites, is still important and is now being progressed with Shepway District Council It therefore gives rise for more grounds for optimism

than in the previous assessment of this matter. Positive aspects will be more particularly notable once it is implemented later in the plan period.

- 3) For reasons outlined in more detail elsewhere in the SA, essentially relating to national policies giving increased emphasis to the priority of housing growth to meet national and local needs, the relative balance between SA objectives needs to be taken into consideration.

## Option (H) Rural Areas Scale of Growth

Rural Areas Option 4: 1,670 dwellings or 98 per annum (2011-2028)

Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home.	✓	✓	✓	Greater contribution to housing provision, providing significant increased contribution to requirement.
2. Improve the health and well-being of the population and reduce inequalities in health	~	~	~	There is a link between good quality affordable housing and health and well-being. More housing in rural areas (as opposed to the towns) would mean new residents were less accessible to key medical services, such as hospitals.
3. Reduce crime and the fear of crime	~	(✓)	(✓)	Some links in that housing may reduce deprivation and social exclusion, which can be a contributory factor in reducing crime.
4. Reduce deprivation and social exclusion	~	✓	✓	Easier access to the housing market may help reduce deprivation and social exclusion.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	(x)	(x)	Although the SHLAA has focussed on villages with a primary school, more housing in areas less accessible to colleges and university, will reduce the proportion of the population with access to opportunities for lifelong learning.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	~	~	Limited impact of new housing on economic growth; also less likelihood of higher value, low impact activities in AONB. Additional housing marginal impact on economic activity. It may support services in villages where service viability is marginal.
7. Improve accessibility to services and facilities for all ages across the District	~	(x)	(x)	Generally, the more housing in villages, relative to towns, would not improve accessibility to services and facilities, particularly for the young and old. However the SHLAA has at least focussed on those villages with the widest range of services.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	(x)	(x)	Similar to access to services and facilities as above, with most activities available in the larger towns. Development may help facilitate some local services but only to a limited extent.
9. Improve efficiency in land use and encourage the prudent use of natural resources	(x)	x	x	More housing in rural areas may result in inefficient use of natural resources, notably land.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(x)	(x)	x	More housing in Rural Areas, with less travel choice and less accessible to key services, is likely to increase use of the private car and longer journeys.
11. Reduce emissions of greenhouse gases	~	~	~	Little opportunity for renewable energy options reliant on larger scale developments, although limited differences between options.
12. Minimise the risk of flooding and resulting detriment to people and property	~	?	(x)	Will depend on specific locations for development. Generally, sites exist beyond flood risk areas, although still several villages where known flood risk issues. Pressure greater with more development in one location.
13. Maintain, improve and manage water resources in a sustainable way	~	~	~	Relationship unclear, but no known spatial aspect to water resources affecting housing distribution.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	~	(x)	(x)	Arguable that more housing may increase impacts on the range of species and habitats, both directly and indirectly. This is balanced by the fact that several site specific opportunities for biodiversity improvements have been identified.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	~	(x)	x	Some impact on areas of landscape sensitivity, notably within the High Weald AONB: greater as scale of housing increases, both in terms of impact on the character and setting of individual settlements and cumulatively on the natural beauty of the AONB. Significant as there is a statutory duty to have regard to the conservation of the High Weald AONB; the 'great weight' to be given to this in national policy reflects this duty.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	(x)	(x)	(x)	Greater scale of house building will almost certainly result in greater level of waste generation.

**Conformity with other policy/initiatives:** Higher housing growth responds to NPPF emphasis on housing growth, may support the provision of local services in some villages

**Non-conformity:** Range of more negative impacts as outlined above.

## **6.7 Rural Areas Scale of Growth: Commentary and Summary**

- 6.7.1. As a result of recent changes and evidence work, the proposed housing figure for the Rural Areas has risen from 1,270 proposed in January 2013 to 1,670 now proposed (98 per annum). Officers have had further discussions with Parish Council representatives to positively pursue the scope for additional land releases. This has led to the identified capacity of 1,670 dwellings.
- 6.7.2. Many villages are expected to provide additional new homes, broadly in relation to their service role, thus continuing the primary strategy emphasis on service centres. It is important to note that no specific changes are proposed in respect of the countryside. It will remain strongly protected, with net increases in housing only being allowed where there is a strong justification.
- 6.7.3. The significant increase requires further sustainability appraisal as undertaken as part of 'Rural Areas Option 4'. In terms of the overall scale of housing, it is notable that the scale of housing now proposed in the inland parts of the District is higher than that deemed appropriate by the Panel examining the South East Plan.
- 6.7.4. There is a statutory obligation to have regard to the conservation of the High Weald AONB; the 'great weight' to be given to this in national policy reflects this duty. It is very difficult to prescribe a "carrying capacity" of the landscape. Rather, in undertaking the review of development potential in the AONB, and following discussion with AONB officers, use has been made of data identifying key landscape features as well as information about the historical development, and typology, of settlements. These have complemented the area-based landscape assessments (previously carried out by the County Council's Landscape Group) and site surveys.
- 6.7.5. As may be implied from the additional development potential identified in the SHLAA Update, there will inevitably be some sites where (subject to further investigation) development may cause a degree of harm to the AONB setting of settlements, but not such harm as to prevent them being considered in order to help towards boosting the supply of housing.
- 6.7.6. Nevertheless, the cumulative implications of further activity, and populace, in the AONB will impact on its character. To mitigate these, maintaining the settlement pattern, the character of settlements and the tranquility of more remote locations have all been considered. At the settlement level, inevitably, there will still be some adverse AONB impacts, if only by the loss of open fields. Detailed proposals will be required to not only mitigate these impacts but, where practicable, to incorporate measures to enhance key characteristics of the AONB.
- 6.7.7. The key test for growth in the villages is whether it reflects the vision to retain their distinctive, individual character and qualities, as well as support local services and community "life". Every effort has been made to ensure that the increases represent a manageable level of growth in terms of absorption into the settlement, socially and physically, as well as in terms of local infrastruc-

ture. The scale of growth is still broadly proportional to settlement size and services.

- 6.7.8. It is considered that an even higher level of growth would have exacerbated the negatives further beyond what could reasonably be considered acceptable in light of the area's landscape, heritage and environmental constraints.

## **7. CUMULATIVE and SYNERGISTIC EFFECTS, PROPOSED MITIGATION MEASURES and IMPLEMENTATION**

### **7.1 Cumulative and Synergistic Effects**

7.1.1 “Cumulative and synergistic effects” relate to the impacts on the SA Objectives of the plan’s policies taken together. Given that this SA (the Core Strategy Proposed Revised Modifications as presented to Full Council on 8<sup>th</sup> July 2013), is confined to an assessment of the implications of housing growth, the cumulative and synergistic effects are analysed via the B Options ‘District-Wide Scale of Growth’ which is the cumulative total of change within each individual spatial area. It may be necessary to provide supplementary SA assessments of the Policies at the time of their publication

### **7.2 Mitigation Measures**

The PSCS SA highlighted in Section 7 those policies considered to have a key role in limiting potentially damaging impacts of the plan as a whole. The same policies are relevant in mitigating any adverse effects arising from the proposed modifications. It is noted that all CO, SRM, EN and TR policies, relating to community, sustainable resource management, environmental and transport measures, have positive mitigating roles in relation to accommodating development sustainably. Policies OSS3, OSS4, OSS5, BX1, BX2, RY1, BA1, RA1, SRM1, SRM2, also have roles to play in ensuring that individual sites and urban extensions accommodate development sustainably. Mitigation measures on a site by site basis will have detailed consideration as part of the ‘Development and Site Allocations DPD’.

### **7.3 Implementation**

7.3.1 The commentary on ‘Implementation’ set out in the PSCS SA remains valid. The principal means of monitoring progress on development, including the maintenance of an appropriate 5-year supply of deliverable housing sites, will be via the annual monitoring report process.