



Rother District Council

# Core Strategy

**Sustainability Appraisal  
of the Council's proposed  
modifications,  
as approved by  
Full Council on  
21 January 2013**



January 2013

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Issues &  
Options



Strategy  
Directions



Pre - Submission



Examination



Adoption



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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 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 mainly 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'.

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. This responds to a letter from the Inspector conducting the Examination of the Strategy dated 13 December 2012 (which is available on the Council's Core Strategy web-page), and which specifically suggested reverting to the South East Plan housing target of the District. Identification of reasonable options is set out at Section 5.2 of this SA and summarised below.

1.1.4 The substance of the SA of these options is set out in Section 5.3 and Appendix 1. This is followed in Section 6 by appraisals of the policies that are proposed to be modified in the light of the conclusions on the spatial options. Section 6 also appraises other policies as proposed to be modified.

## 1.2 Scope of the SA

1.2.1 The identification of reasonable options in Section 5.2 considers the potential for additional development:

- a) in the District as a whole; and
- b) 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 currently proposes 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 More up-to-date information on contextual factors that affect the pattern and timing of development assumed in the earlier appraisal provides a basis for re-appraising the South East Plan scale of growth. Such factors, identified in Section 3, may address at least some of the reasons why the level of growth in the ‘Consultation on Strategy Directions’ was not found to be sustainable previously.
- 1.2.4 An even greater scale of growth has not been re-appraised, as the context has only changed by a degree that may make the South East Plan scale of growth more sustainable, but not a materially greater amount. Also, a greater scale of growth (SE Plan +25%) was appraised at the time of the ‘Consultation on Strategy Directions’ (in the Initial SA), but rejected.
- 1.2.5 In terms of the distribution of development, the contextual changes most directly relate to Bexhill. Hence, the scale of development here needs to be re-appraised. At the same time, the SA reviews whether there are reasonable options for all spatial areas to make a greater contribution to housing supply. It concludes that neither Battle nor Rye has capacity to accommodate more development sustainably, and that the Hastings Fringes has only very limited additional potential. The SA reviews options for increased amounts of housing in the Rural Areas, taking account of the existing evidence including the ranges of growth contained in the PSCS, arguments made during the Examination and on-going work with Parish Councils.
- 1.2.6 In summary, the spatial options are set out below. *The references in brackets relate to option numbers, where these exist, in the PSCS SA.:*

#### Overall scale of growth

Proposed Modification Option B1a <sup>1</sup>	-	Scale of growth equivalent to South East Plan rate (i.e. 4,810 dwellings, 2011-2028)
PSCS Option (Option B2)	-	Scale of growth in PSCS (i.e. 3,700-4,100 dwellings, 2011-2028)

#### Bexhill

Proposed Modification Option D1a <sup>2</sup>	-	Scale of growth as proposed in ‘Consultation on Strategy Directions’ (2,700 dwellings 2011-2028)
PSCS Option (Option D2)	-	Scale of growth in PSCS (i.e. 2,050-2,250 dwellings, 2011-2028)

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<sup>1</sup> This is effectively a re-appraisal of PSCS SA Option B1, but has different assumptions about distribution (now based on the proposed modifications, and takes account of contextual changes).

<sup>2</sup> This is effectively a re-appraisal of PSCS SA Option D1, but has different assumptions about distribution and timing in the light of contextual changes.



## **2. INTRODUCTION**

### **2.1 Scope and Purpose of this Sustainability Appraisal (SA) Report**

- 2.1.1 This SA assesses the proposed modifications being considered by Rother District Council in order to address soundness issues raised by the Local Plan Strategy Inspector. Its purpose is to inform the Council's decision on the proposed modifications to submit to the Inspector and, specifically, to assist in ensuring that the modifications promote sustainable development.
- 2.1.2 This SA document supplements the 'Proposed Submission Core Strategy Sustainability Appraisal (incorporating focused amendments)', referred to in this document as the '*PSCS SA*'. Reference is also made to the 'Core Strategy Consultation on Strategy Directions Interim Sustainability Appraisal Report', referred to in this document as the '*Interim SA*'.
- 2.1.3 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.

### **2.2 Structure of the Report**

- 2.2.1 The structure of this document mirrors as far as possible that of the PSCS SA. Consideration of the spatial options underpinning the Proposed Modifications is contained in Section 5. They propose an 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 the 'District-wide scale of growth' (Option B in the PSCS SA), as well as of further options for the scale of growth in each of the spatial areas of the Strategy.
- 2.2.2 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.
- 2.2.3 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.
- 2.2.4 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 Introduction**

3.1.1 This section updates the 'Sustainability Background' (Section 3) 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.

#### **3.2 Notable strategies, plans and programmes**

3.2.1 The Localism Act: This was enacted in November 2011. It contains a number of proposals to give local authorities new freedoms and flexibility. The Act updates the planning and Compulsory Purchase Act in relation to plan-making. It enabled the formal abolition of the regional spatial strategies (RSSs). It also introduced a new right for communities to draw up a 'Neighbourhood Plan' through a local Parish Council or neighbourhood forum.

3.2.2 The status of the South East Plan is very relevant. Following legal challenge, the Government is undertaking a programme of RSS reviews. It has consulted upon the Environmental Report into the abolition of the South East Plan, but has not concluded its findings. Therefore, the South East Plan remains part of the 'development plan' at this point. Hence, the local Plan is still required to be in general conformity with it. It was highlighted by the Chief Planner at DCLG that the evidence underpinning the RSS can still be relevant to plan preparation when an RSS is revoked.

3.2.3 The advent of neighbourhood planning may impact on the Local Plan in that it needs to give a clear steer on the strategic policies of the area. General conformity with the strategic policies is required of a Neighbourhood Plan.

3.2.4 The Localism Act also introduces the 'Duty to cooperate' as an alternative to regional planning. While co-operation has been good practice, it is now requires local authorities and other public bodies to work together on strategic planning issues.

3.2.5 The [National Planning Policy Framework](#) (the 'Framework') was published on 27 March 2012 as a consolidated set of policies covering all forms of development and setting out national economic, environmental and social priorities. Key elements include:

- placing the local plan as the keystone of the planning system
- establishing a presumption in favour of sustainable development
- providing strong protection for the natural and historic environment, and seeking enhancements
- raising design standards to the most exacting yet

- 3.2.6 ESCC Strategic Open Space Study: This Study, previously in draft form, has now been adopted. Its objectives were to identify the existing level of open space accessible to East Sussex residents and what further provision is required to give reasonable access to the population as a whole. The study found that in relation to the largest category in the ANGSt analysis, namely 500ha sites within 10km of our homes, that a wide band of deficiency exists from Hastings and Bexhill, through Battle and up to Heathfield. The proposed Combe Valley (formerly Pebsham) Countryside Park between Bexhill and Hastings and adjoining the planned North East Bexhill development, will make a major contribution to meeting this need.
- 3.2.7 Bexhill to Hastings Link Road: The Link Road is critical to the Local Plan Strategy, as it has a major bearing on the capacity for development at Bexhill. The PSCS anticipates its eventual approval, but also includes an alternative policy approach in the event of significant delay or cancellation of the scheme.
- 3.2.8 Since preparation of the PSCS, there have been notable milestones reached, in that Provisional Funding Approval was given by the Government in 2012 (and a legal challenge to that approval dismissed) and the Compulsory Purchase and Side Road Order have also been approved by the Secretary of State for Transport (and not challenged). Therefore, final funding approval is expected to be imminent.
- 3.2.9 The programme for construction is as set out in the PSCS; that is, for road opening at the end of 2014. Although the legal challenges may have impacted on the start of works, this has been mitigated by the County Council (scheme promoter) through early contractor engagement. Preparatory works are currently on-going.
- 3.2.10 Therefore, for the purposes of the SA, it is assumed that the Link Road will, essentially, remain as currently programmed, but not discounting the possibility of a slippage of up to 3 months.
- 3.2.11 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.
- 3.2.12 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.)



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

- 3.3.1 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.
- 3.3.2 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.
- 3.3.3 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 Approach to the Sustainability Appraisal

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. PROPOSED MODIFICATIONS - SPATIAL OTIONS AND APPRAISALS**

### **5.1 Introduction**

- 5.1.1 The Council is required to plan for a level of development that is in general conformity with the South East Plan. It must also have regard to Government policy as expressed in the NPPF.
- 5.1.2 The Inspector conducting the examination of the Local Plan Strategy has suggested that further consideration be given to reverting to a scale of growth that meets the full South East Plan housing requirement.
- 5.1.3 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). Regard has also been had to sustainability issues raised during the Examination to date.
- 5.1.4 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?

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

- 5.2.1 The Council's Cabinet has considered the Inspector's letter setting out her "preliminary conclusions"<sup>3</sup> and is minded to recommend a number of proposed modifications, subject to this Sustainability Appraisal.
- 5.2.2 Increasing housing provisions in the Strategy necessitates further appraisal of both the scale of growth and the distribution 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.

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<sup>3</sup> The letter is available on the [Core Strategy Examination Latest Information](#) web-page

### Overall scale of growth

- 5.2.3 To meet the South East Plan housing requirement, the overall level of housing across the District must increase from 3,700-4,100 dwellings, to some 4,810 dwellings over the period 2011-2028.
- 5.2.4 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.
- 5.2.5 Previous SA stages have appraised an option to '*continue South East Plan requirements of 280 per annum*' (PSCS SA Option B1), as well as options for both a higher rate of housing (Initial SA District-wide Scale of Growth Option 2) and a lower rate (PCS SA Option B2).
- 5.2.6 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. Therefore, the reasonable options for further appraisal are:
- a) The rate of housing growth to meet the South East Plan
  - b) The rate of housing growth in the Proposed Submission Core Strategy.
- 5.2.7 The former option amounts to 283 dwellings/year over the period 2011-2028, while the current PSCS proposes 218-241 dwellings/year.
- 5.2.8 While the South East Plan option has already been appraised, it is evident from Section 3 that there have been contextual changes that may impact on the appraisal which, in turn, may result in different conclusions vis-à-vis a lower rate of growth. Therefore, the detailed reappraisal of this option is undertaken in Section 5.3.
- 5.2.9 The contextual changes are not regarded as having a material bearing on the PSCS scale of housing growth (Opinion B2), as it is already scored poorly in relation to the sustainability objectives impacted upon by the lower quantum of housing. The commentary on the South East Plan housing growth reappraisal below includes comparison with the B2 option.

### Scale of growth in the spatial areas

- 5.2.10 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

- 5.2.11 The PSCS SA gives consideration to a level of, on average, 160 dwellings/year (Option D1) and a level of, on average, 129 dwellings/year. The latter 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 *‘more houses may not complement wider regeneration goals, but instead reinforce retirement and deprivation characteristics’*. (PSCS SA paragraph 5.42ae).
- 5.2.12 A further factor was that it was assumed that further housing both in advance of, and after, Link Road construction would *‘weaken the marketability of the North East Bexhill location once it does become available after link road completion.’* This impacted on the SA of higher growth as NE Bexhill was found to clearly offer the greatest sustainability benefits of development options in the town.
- 5.2.13 While both issues remain relevant, the progress of the Link Road scheme and the knock-on impact on development activity in bringing forward NE Bexhill developments, mean that the impact of more housing on this existing allocation is less than previously anticipated (see Section 3).
- 5.2.14 Therefore, a re-appraisal of PSCS Option D1 is considered warranted, as it may now represent a more reasonable option than previously. This option is considered to be somewhat different in its detail from Option D1 in that it assumes that employment development will take place at an earlier time than previously and that the development at NE Bexhill is not prejudiced to the same degree as previously.
- 5.2.15 Given that the scale of additional housing implied by Option D1 (the South East Plan related rate of c160 dwellings pa) was materially greater than the lower rate (Option D2) preferred and incorporated in the PSCS, and that there remain clear structural economic weaknesses in the area, an even higher rate of housing growth is not regarded as a reasonable option.
- 5.2.16 Therefore, a proposed modification option for Bexhill to achieve the South East Plan level of housing is:

Option D1a - Level of housing of some 2,700 dwellings, 2011-2028

- 5.2.17 The commentary on the SA of this option compares it to the PSCS Opinion D1 and, most significantly, in assessing whether it represents a more sustainable option, with Option D2.

## Hastings Fringes

- 5.2.18 The PSCS SA gives consideration to the scale of development identified in the ‘Consultation on Strategy Directions’ document, being 200-450 dwellings. The alternative option was a lower level of development, which was assumed to be 45-80 dwellings.

5.2.19 There have been no contextual changes that suggest reconsideration of rejected growth locations that made up the greater part of the 200-450 dwellings target. However, recognising that Hastings is the largest town in the housing market area and following a further review of potential opportunities within, as well as on the edge of, the 'development boundary', it is considered that the "lower level" supported by the PSCS SA may be increased somewhat from 45-80 dwellings to an (indicative) target of 100 dwellings. For SA purposes, it is assumed that the upper end of the target range is achievable, with some 20 additional dwellings within the existing development boundary.

#### Rye and Rye Harbour

5.2.20 The PSCS 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. 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. Both environmental and development constraints suggested a provision of 250-350 net additional dwellings would be more appropriate.

5.2.21 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.

5.2.22 Nevertheless, given the overall need for housing to achieve the South East Plan target, it is not considered that it would be a reasonable option to entirely discount the prospect of achieving the upper figure of 350 dwellings. Indeed, there was some evidence during the Hearings that suggest additional housing could be achieved via redevelopment.

5.2.23 In conclusion, a target of 250-350 is considered to be the only reasonable alternative. Hence, no further options are put forward for SA to achieve the Proposed Modifications Option of an increase in housing across the District.

#### Battle

5.2.24 The Initial SA 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.

5.2.25 The PSCS already provides 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.

5.2.26 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.

### Rural Areas

5.2.27 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.

#### Interim SA - Spatial Distribution of Growth:

5.2.28 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.

#### Interim SA - Rural Areas:

5.2.29 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

5.2.30 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.

5.2.31 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*'.

5.2.32 In the context of these appraisals and the relevant background evidence documents, it is 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
- Option 2 - PSCS growth plus 10%
- Option 3 - PSCS growth plus 20%

5.2.33 A higher level (+30%) of growth is 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.

5.2.34 Description of Option 1: This is as contained in the Proposed Submission Core Strategy. It provides for 950-1,000 dwellings but, including small site windfalls<sup>4</sup> in Years 5-10, it amounts to some 1,165 dwellings (based on the mid-point).

5.2.35 Description of Option 2: This provides for a 10% increase in the PSCS provision of housing in Rural Areas, and amounts to some 1,250 dwellings 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.

5.2.36 Description of Option 3: This provides for a 20% increase in the PSCS provision of housing in Rural Areas. This amounts to some 1,360 dwellings 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 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').

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<sup>4</sup> See the [Council's Proposed Modifications](#) for number and distribution of small windfall sites (less than 6 dwellings), including rural 'exception sites'.



### 5.3 Detailed Sustainability Appraisal of the Proposed Modifications Spatial Options

5.3.1 The appraisals of the reasonable options to achieve a higher provision of housing, equivalent to that set out in the South East Plan are summarised below, which often involves comparisons with existing assessments in the PSCS SA. Detailed assessments are contained in tables in Appendix 1. As in the PSCS, new options are assessed against the sixteen SA Objectives, in the short, medium and long term. There is also reference to ‘Conformity/Non-Conformity’ with other policy/initiatives.

5.3.2 An overview summary of all the respective assessments is provided in section 5.4, which is reproduced in the Non-Technical Summary in Section 1.

#### District-wide scale of growth

<b>District-wide scale of growth</b>
<b>Option B1 – Continue South East Plan requirements (see PSCS SA appraisal for details)</b>
<b>Conformity with other policy/initiatives:</b> Would conform with the housing target set in the South East Plan.
<b>Non-conformity:</b> Possible conflict with AONB objectives and NPPF policies for rural areas and the natural environment. Arguably conflicts with principles of Localism Act, which looks to give more decision-making to local communities rather than top-down regional requirements.
<b>Option B1a - Continue South East Plan requirements – re-appraisal as proposed modifications</b>
<b>Conformity with other policy/initiatives:</b> Would conform with the housing target set in the South East Plan. Conformity with regeneration priority in the Sussex Coast, subject to effectiveness of on-going initiatives and developments.
<b>Non-conformity:</b> Possible adverse impact on jobs supply and character of the wider AONB in longer term.
<b>Option B2 –Proposed Submission Core Strategy rate of development (see PSCS SA appraisal for details)</b>
<b>Conformity with other policy/initiatives:</b> Greater conformity with AONB objectives, as well as localism approach
<b>Non-conformity:</b> Would not conform with the housing target set in the South East Plan.

#### Commentary

5.3.3 The full appraisal of the new option (Option B1a) of achieving the South East Plan level of housing over the plan period, as presented in Appendix 1, shows that it performs well in housing and social terms, including in relation to accessibility objectives. While there are some negative environmental “scores”, these are all relatively minor in scale. The specific impact on the built and natural environment is mostly positive, qualified by cumulative impacts in the longer term.

5.3.4 The revised appraisal, in SA terms, of this option relative to Option B1 in the PSCS SA, is largely due to the changed context (see Section 3) 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.

- 5.3.5 This appraisal now compares more favourably against the current PSCS scale of development (Option B2 in the PSCS SA). As well as maintaining clear relative benefits in terms of housing and social and SA objectives, it also offers some further advantages in terms of access to services and facilities, including culture and leisure, while the relative environmental disadvantages of higher growth (previously appraised under option D1) are reduced, most notably in relation to the built and natural environment.
- 5.3.6 It is also noted that the relative impacts of the higher and lower levels of growth on the emission of greenhouse gases, use of natural resources and traffic congestion and pollution are less than originally assessed.
- 5.3.7 The Proposed Modification Option B1a is therefore supported.

### Bexhill scale of growth

<b>Bexhill - Scale of growth</b>
<b>Option D1 - South East Plan rate of development (c160 dwellings pa) (see PSCS SA appraisal for details)</b>
<b>Conformity with other policy/initiatives:</b> Conforms with South East Plan in terms of quantity, but arguably may result in non-conformity in terms of regeneration strategy and location of growth if development was directed towards other areas of Bexhill, instead of, or in advance of, NE Bexhill. The Highways Authorities have indicated that they do not believe that large new sites can be built ahead at NE Bexhill of the Link Road. Therefore a continued rate of development would inevitably result in alternative sites in the Bexhill area, that relate less well to Hastings, being prioritised ahead of NE Bexhill. Non-conformity with SE Plan policies that promote the economic and social regeneration of the Hastings/Bexhill area (and capitalise on Hastings as a regional hub) may therefore be the inevitable consequence of this option, with housebuilding not balanced by commensurate job growth.
<b>Non-conformity:</b> As above. Arguably may result in non-conformity with SE Plan in terms of regeneration strategy and location of growth if development was directed towards other areas of Bexhill instead of, or ahead of, NE Bexhill. SE Plan Policy SCT2 promotes the social and economic regeneration of areas in greatest need by continuing the support to Hastings/Bexhill. SE Plan Policy SCT3 promotes the economic development potential of mixed-use sites at North East Bexhill. SE Plan Policy SCT7 specifically identifies the 'Hastings-Bexhill area' as a focus for delivering economic and social regeneration, in order 'to develop and extend the work already undertaken in the 'Five Point Plan' into the longer term and to capitalise on Hastings as a regional hub'.
<b>Option D1a - Plan for some 2,700 net additional dwellings 2011-2028 (159 dwellings pa)</b>
<b>Conformity with other policy/initiatives:</b> Conforms with South East Plan in terms of contribution to housing requirements for the District, coastal area and for the town itself (as envisaged as the focus of development in Rother District). This scale of house building will be some 50% more than the average over the past 20 years and, hence, contribute substantially to the Government's policy to significantly boost house building. This higher level of house building may also contribute to the sub-regional 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> Risk of non-conformity with South East Plan sub-regional strategy which promotes a better balance between homes and jobs. 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 further impacting on the potential for economic growth.
<b>Option D2 - Proposed Submission Core Strategy rate of development (121-132 dwellings pa) (see PSCS SA appraisal for details)</b>
<b>Conformity with other policy/initiatives:</b> Conforms with South East Plan in terms of regeneration strategy and location of growth, but does not meet SE Plan housing quantity targets.
<b>Non-conformity: South East Plan.</b> Policies that emphasise the importance of meeting housing and development needs.

## Commentary

- 5.3.8 The scale of housing growth proposed by Option D1a is 2,700 dwellings over the Plan period, an average of 159 dwellings/year. This is more than envisaged in the PSCS, but is compatible with the Bexhill Strategy in that it is capable of being accommodated in existing identified sites and broad areas for future development already shown on the Key Diagram.
- 5.3.9 The SA of the Proposed Modification Option D1a shows that, in broad terms, it scores well in relation to social and housing objectives, and in relation to economic objectives subject to reservations regarding the capacity of the economy to grow, notwithstanding progress on the Bexhill to Hastings Link Road, and in bringing forward adjacent major mixed-use development area, including business areas.
- 5.3.10 There are some environmental issues with this scale of growth, but none of these appear to be fundamental and should be capable of being mitigated through detailed planning.
- 5.3.11 The SA of this Proposed Modification Option D1a can be compared to that of Options D1 and D2 in the SA of the PSCS (as referred to above), which correlate to the 'Consultation on Strategy Directions' scale of growth and the PSCS scale of growth respectively.
- 5.3.12 While Option D1a has the same scale of housing as Option D1, the SA differs from that of Option D1 due to the contextual changes since July 2012 in certain key respects (See Section 3). The impact of these changes is that there is now a much greater likelihood that business development will be underway sooner and more rapidly than previously expected (although clearly still in a relatively weak commercial market), which lessens the adverse impacts of more housing not only on the balance of homes and jobs, but also on the expected phasing of housing in different parts of the town and their combined impacts on economic objectives. The timing of related housing is also brought forward somewhat.
- 5.3.13 Comparison with PSCS SA Option D2 (the then favoured option) shows that the housing and social merits of the Proposed Modification Option D1a are more evident relative to Option D2. While Option D2 is still assessed as having greater advantages in a number of environmental respects, the relative adverse impacts of Option D1a are assessed as not as widespread as previously (under D1) and with potential to mitigate a number of these. In economic terms, the differences are not clear-cut, with Option B1a potentially being more sustainable, subject to a plan-monitor-manage approach to ensure that there is a reasonable balance of new homes and jobs.
- 5.3.14 The net effect of the appraisal in these changed circumstances is that the economic sustainability of the PM Option is shown as better than Option B1, and now also a more sustainable option than Option B2.

## Hastings fringes

- 5.3.15 It was noted in the PSCS SA that the scale of housing growth assumed to be the alternative to the 200-450 dwellings 'Consultation on Strategy Directions Option' (Option E) was 45-80 dwellings.
- 5.3.16 Further investigation of the development potential of the Hastings Fringes has identified realistic opportunities for additional, albeit relatively modest developments within development boundaries that could enable an increase provision of some 100 dwellings. Although this is a modest increase (of 20-55 dwellings), the relative sustainability implications of such an increase from 45-80 dwellings, where these are found to arise, are identified below.
- 5.3.17 Social/housing SA objectives: There is a small benefit from additional housing in providing more homes and thereby helping to address social issues.
- 5.3.18 Education/economic SA objectives: There is some, albeit limited, positive economic impact of this scale of housing if it can contribute to the development of business land through a comprehensive approach.
- 5.3.19 Accessibility SA objectives: The likely locations of development are similar, such that there is no material difference between the respective scales of housing. Both should have good accessibility to a wide range of services and facilities, including cultural activities.
- 5.3.20 Environmental SA objectives: There are no adverse environmental impacts associated with either scale of development; both may yield environmental improvements if development between Ivyhouse Lane and Rock Lane is undertaken in conjunction with improved management of open land either side of the railway.

## Rural Areas

Option
<b>Option 1 - PSCS level of growth</b>
<b>Conformity with other policy/initiatives:</b> Would conserve the character of the countryside, especially the High Weald AONB, in line with national and regional policies, as well as provide housing to help meet local needs.
<b>Non-conformity:</b> Unlikely to sufficiently contribute to fully meeting the housing requirement in the South East Plan and the Government's (nation-wide) aim for increased housing supply.
<b>Option 2 - PSCS growth plus 10%</b>
<b>Conformity with other policy/initiatives:</b> Should help achieve housing target of South East Plan, subject to growth elsewhere in the district. Also, should not adversely impact on character of settlements in the AONB or on the settlement pattern in rural areas.
<b>Non-conformity:</b> Some risk of adverse cumulative impact on AONB character, but within tolerances accepted under Option 1.
<b>Option 3 - PSCS growth plus 20%</b>
<b>Conformity with other policy/initiatives:</b> Would help achieve housing target of South East Plan, with relatively less reliance on additional capacity for growth elsewhere.
<b>Non-conformity:</b> Risk of adverse cumulative impact of more development in the AONB, as well as on character of individual villages as a result of more development.

## Commentary

5.3.21 Generally, all options have some environmental impact associated with additional car travel, as well as more limited access to certain services and leisure/cultural facilities.

5.3.22 Options 2 and 3 perform better in housing terms although similar in social terms relative to Option 1.

5.3.23 Option 2 is unlikely to involve any greater impact on the AONB than Option 1, as the amount of additional housing still lies within the range identified for individual settlements in the PSCS. However, there may be some cumulative adverse impact over time on the AONB as a whole.

5.3.24 Option 3 is likely to have more significant impacts on both the character and setting of some individual settlements and, cumulatively, on the character of the High Weald AONB.

5.3.25 In the context of the potential for harm to the High Weald AONB (the conservation of which is a priority in national policies), as well as other greater negative environmental impacts associated with Option 3, Option 2 is preferred.

## **5.4 Summary**

5.4.1 The SA of spatial opinions concludes that, having due regard to progress on the Bexhill to Hastings Link Road and the bringing forward of development, especially employment development land, at North East Bexhill, the option of achieving a higher overall rate of development, equivalent to that in the South East Plan, is more sustainable than the lower rate of development currently contained in the PSCS. i.e. Option B1a is supported.

5.4.2 The most sustainable distribution of this higher level of housing is found to be by increasing the scale of development at Bexhill (Option D1a is supported), together with some increase in the Rural Areas, but not to the higher extent, as that would adversely impact on the qualities of the AONB in particular, both for some individual settlements and cumulatively. (i.e. Rural Areas Option 2 is supported.) The additional scale of housing at the Hastings Fringes is also supported, it having only a minor, but favourable, impact on SA objectives.

5.4.3 It is also noted that the greater focus on the 'Sussex Coast' areas of the district is also consistent with the relevant South East Plan policies.

5.4.4 The SA therefore supports the proposed modifications.

## 6. SUSTAINABILITY OF POLICIES MATERIALLY CHANGED BY THE PROPOSED MODIFICATIONS

### 6.1 Introduction

6.1.1 The following policies are proposed to be modified in the manner described, as well as an additional policy incorporated that highlights the presumption in favour of sustainable development.

6.1.2 These proposed modifications respond to the consideration of the spatial options for accommodating the scale of housing set out in the South East Plan as well as to the implications for the core policies. Other changes proposed during the Hearings are also identified.

Policy	Nature of modification
OSS1 – Overall Spatial Strategy	Increase of additional housing from 3,700-4,100 dwellings (net) in the district over the period 2011-2028 to 4,810 dwellings. <sup>5</sup>
BX3 – Bexhill Development Strategy	Increase of housing growth from some 2,050-2,250 dwellings to some 2,700 dwellings. <sup>2</sup>
HF1 – The Hastings Fringes	Increase of net additional dwellings from 45-80 to 100 dwellings. <sup>2</sup>
RY1 – Rye and Rye Harbour	Increase of net additional dwellings from 250-350 to 260-360 dwellings. <sup>2</sup>
BA1 – Battle	Increase of net additional dwellings from 400-440 to 410-450 dwellings. <sup>2</sup>
RA1 – Villages	Increase of net additional dwellings from 950-1,000 to 1,270 dwellings. <sup>2</sup>
EC2 – Business Land and Premises	Inclusion of reference to the role of mixed use developments
EC6 – Tourism	Inclusion of criterion that refers to compatibility with other policies, replacing that which only refers to access factors.
IM3 – Implementation	Inclusion of reference to ensuring a balance with the supply of jobs in the area when considering the phasing of housing.
New policy – Presumption in favour of sustainable development	Inclusion of a new policy that articulates the presumption in favour of sustainable development contained in the National Planning Policy Framework.

**N.B.** Although not proposed as a modification at this point, the Council anticipates that Policy OSS2, which is a contingency policy in the event of significant delay or cancellation of the Bexhill to Hastings Link Road, would be deleted if final funding approval is received and main construction starts before the Inspector reports.

<sup>5</sup> The new figures includes an allowance for small windfall sites (less than 6 dwellings) in years 5-10 which were excluded from the earlier figures.

6.1.3 It is highlighted in Section 5 that the proposed modifications make no material change to the scale of growth in either Battle or Rye, save to incorporate an explicit allowance for small site windfall sites in years 5-10 of the Strategy. Therefore, it is arguable that there is no reason to review the appraisals of PSCS policies BA1 and RY1 contained in the PSCS SA. Nevertheless, they are included in the table below for completeness, to enable comparative assessment, and to test whether the scale of small sites windfalls anticipated makes any effect to the respective appraisals.

## **6.2 Significant social, environmental and economic effects of the proposed modifications to the Plan policies**

6.2.1 A summary of the significant effects is presented below in relation to each SA objective. The following commentary draws on the SA of the PSCS policies, as set out in Section 6.2 of the PSCS SA, for comparison.

Sustainability Appraisal Objectives	OSS1 Overall Spatial Strategy	BX3 Bexhill Development Strategy	HF1 Hastings Fringes	RY1 Rye	BA1 Battle	RA1 Villages	EC2 Bus Land & Premises	EC6 Tourism	IM3 Phasing	Presumption In Favour Of Sustainable Development
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	✓	✓	~	(✓)	✓	✓	(✓)	~	✓	✓
2. Improve the health and well-being of the population and reduce inequalities in health	(✓)	~	(✓)	(✓)	(✓)	(✓)	(✓)	~	(✓)	(✓)
3. Reduce crime and the fear of crime	(✓)	(✓)	~	~	~	~	(✓)	~	~	(✓)
4. Reduce deprivation and social exclusion	(✓)	(✓)	(✓)	✓	(✓)	(✓)	✓	(✓)	(✓)	(✓)
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	~	~	~	~	(✓)	~	~	(✓)	(✓)
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	✓	✓	~	✓	(✓)	(✓)	✓	✓	(✓)	✓
7. Improve accessibility to services and facilities for all ages across the District	✓	(✓)	~	(✓)	(✓)	✓	~	~	(✓)	(✓)
8. Encourage and facilitate increased engagement in cultural and leisure activities	(✓)	(✓)	~	(✓)	(✓)	(✓)	~	✓	~	(✓)
9. Improve efficiency in land use and encourage the prudent use of natural resources	(✓)	(✓)	~	~	~	~	x	(✓)	(✓)	(✓)
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	(x)	~	~	~	(x)	(x)	(x)	(x)	(✓)	(✓)
11. Reduce emissions of greenhouse gases	~	~	~	(x)	(x)	(x)	(x)	?	(✓)	~
12. Minimise the risk of flooding and resulting detriment to people and property	~	(✓)	~	(x)	(✓)	(✓)	~	(✓)	(✓)	(✓)
13. Maintain, improve and manage water resources in a sustainable way	~	~	~	~	~	~	~	~	~	(✓)
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	(✓)	~	(✓)	(x)	(✓)	(✓)	~	(✓)	(✓)	(✓)
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	(✓)	~	(✓)	~	(✓)	(✓)	?	(✓)	(✓)	(✓)
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	(x)	~	~	~	~	~	~	(x)	~	~



- 6.2.2 The proposed modifications to the spatial policies make relatively few significant differences from the SA of the PSCS. Of note are:
- A greater beneficial effect on SA Objective 1 access to housing, both overall and for Bexhill
  - Some beneficial effect on accessibility and use of resources SA Objectives (7, 8 and 9) of more housing as sustainable urban extensions at Bexhill
  - A degree of adverse impact on the SA Objective to reduce emissions from more housing in the villages
  - Better implications on several SA environmental objectives from broadening the scope of the considerations within the tourism policy
  - The policy presumption in favour of sustainable development supports a broad range of positive SA Objectives, with no adverse impacts on them
  - The amendments to policies HF1, RY1, BA1, EC2 and IM3 have not had a material impact on performance against SA Objectives.

### **6.3 Cumulative and Synergistic Effects**

- 6.3.1 “Cumulative and synergistic effects” relate to the impacts on the SA Objectives of the plan’s policies taken together.
- 6.3.2 The substantive increase in the scale of housing provisions in the proposed modifications is assessed as increasing the qualified benefit to SA Objective 1 (access to housing) to an unqualified ‘beneficial effect’. The impacts on other SA Objectives are assessed as not changing from those set out in Table 6.3 of the PSCS SA as a consequence of the proposed modifications in the context of the Plan as a whole. For completeness, an updated Table 6.3 is presented below.

### **6.4 Summary**

- 6.4.1 As regards the policies as proposed to be modified, the amendments made in the light of the above appraisals of spatial options, as well as other changes to policy working, are all found to improve the sustainability of the Local Plan Strategy to some degree, notably in relation to housing and social objectives.

Table 6.3 Cumulative and Synergistic Effects of the Plan Policies, as Proposed to be Modified.

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

## **7. PROPOSED MITIGATION MEASURES**

### **7.1 Introduction**

7.1.1 The PSCS SA highlights 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 EN and TR policies, relating to environmental and transport measures, have positive mitigating roles in relation to accommodating development sustainably.

### **7.2 Further mitigation measures**

7.2.1 The preceding SA, particularly that for Bexhill, highlights a potential issue concerning the balance of homes and jobs, and the adverse effects on the vision for the area if the rate of housing outstrips the supply of employment opportunities.

7.2.2 A proposed modification is put forward to policy IM3 to broaden the scope of the criteria to enable regard to be paid to the balance between homes and jobs in the phasing of development, principally through detailed consideration as part of the 'Development and Site Allocations DPD'.

## **8. IMPLEMENTATION**

### **8.1 Overview**

- 8.1.1 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.

## APPENDICES

Detailed SA table for the following options are set out below:

- District-wide Scale of Growth Option B1a – Achieve the equivalent of the South East Plan scale of housing up to 2028
- Bexhill - scale of growth: Option D1a - Plan for some 2,700 net additional dwellings 2011-2028 (159 dwellings pa)
- Rural Areas Option 1 - Proposed Submission Core Strategy level of growth
- Rural Areas Option 2 - Proposed Submission Core Strategy level of growth plus 10%
- Rural Areas Option 3 - Proposed Submission Core Strategy level of growth plus 20%

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 \(incorporating focused amendments\)](#)

Overall Scale of Growth Option B1a – Achieve the equivalent of the South East Plan scale of housing up to 2028				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home.	(✓)	✓	✓	This option would result in more dwellings being constructed than proposed in the PSCS (Option D2). The effect would be felt more in the mid and latter stages of the plan period, but would also increase supply to some extent in the short term (i.e. first 5 years).
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.
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. Focus on Bexhill (and Sussex Coast generally) offers some positive effect. Also, most Rural Areas increases in larger villages.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	~	(✓)	It is not the rate or quantum of development that affects this objective, but the location of development.
9. Improve efficiency in land use and encourage the prudent use of natural resources	~	(x)	(x)	It is anticipated that additional housing will be mostly on greenfield sites. The focus on Bexhill, via sustainable urban extensions, mitigates impact on natural resources and encourages efficient land use through mixed developments.
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. Previous relatively much worse implications of greater scale of growth are reviewed, as more now anticipated in larger developments in Bexhill, as opposed by many smaller developments in rural areas, with associated constraints.
12. Minimise the risk of flooding and resulting detriment to people and property	~	~	~	Dependent more on location, but scale of development in villages previously assessed as not increasing risks, while anticipate manageable solutions at Bexhill.
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.
14. Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats	~	~	(x)	Some impacts inevitable given high bio-diversity interest in district, although should be capable to be managed. Prospect of cumulative impact over time.
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)	Development locations assessed for impact of AONB and individual villages/settings capable of additional housing without adverse impacts, subject to detailed studies, but potential for cumulative impacts to become material towards 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> Would conform with housing target set in South East Plan.				
<b>Non-conformity:</b> Possible conflict with AONB objectives and PPS7 and PPS9.. Arguably conflicts with principles of emerging Localism Bill in that it allows housing numbers to be derived via local needs rather than top-down regional requirement.				

Bexhill - scale of growth: Option D1a - Plan for some 2,700 net additional dwellings 2011-2028 (159 dwellings pa)				
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 than proposed in the PSCS. This increase would amount to some 550 dwellings. The benefit should be throughout the Plan period.
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	(✓)	(✓)	(✓)	(As D1)
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	~	~	~	The housing proposals in themselves would have a neutral effect.
6. Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities	~	?	(X)	Economic growth is already provided within the baseline level of housing and growth. Further housing may facilitate further and/or earlier business development but this may be counter-balanced by a limited capacity to grow the economy quickly notwithstanding that there is progress in relation to bringing the major employment sites forward to the east of the Link Road. This may be a more positive outcome if housing development is effectively balanced by job creation.
7. Improve accessibility to services and facilities for all ages across the District	~	~	~	A higher quantum of development may increase the catchment for services and facilities but further attention would need to be given to accessibility.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	~	~	A higher quantum of development may increase the catchment for cultural and leisure activities but further attention would need to be given to accessibility.
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. However, higher land-take relative to option D2 balances this.
10. Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage	~	~	(X)	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 for this exists via larger 'sustainable urban extensions'.
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.
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)	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 rates of development will result in higher level of waste generation, although sustainability of method of disposal is also key.
<b>Conformity with other policy/initiatives:</b> Conforms with South East Plan in terms of contribution to housing requirements for the District, coastal area and for the town itself (as envisaged as the focus of development in Rother District). This scale of house building will be some 50% more than the average over the past 20 years and, hence, contribute substantially to the Government's policy to significantly boost house building. This higher level of house building may also contribute to the sub-regional 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> Risk of non-conformity with South East Plan sub-regional strategy which promotes a better balance between homes and jobs. 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 further impacting on the potential for economic growth.				

Rural Areas Option 1 - Proposed Submission Core Strategy level of growth				
Sustainability Appraisal Objectives	Assessment			Comments / Proposed Mitigation
	Short Term	Medium Term	Long Term	
1. Ensure that everyone has the opportunity to live in a decent sustainably constructed and affordable home	(✓)	~	(X)	This option does not (in association with preferred options elsewhere) contribute sufficient homes to meet requirement. The impact is likely to be greater in the longer-term, as supply dwindles.
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	~	(X)	(X)	Easier access to the housing market may help reduce deprivation and social exclusion.
5. Raise educational achievement levels and develop the opportunities for lifelong learning	~	~	(X)	More housing in areas less accessible to colleges and university, thus reducing 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.
7. Improve accessibility to services and facilities for all ages across the District	~	~	(X)	Generally, the more housing in villages, relative to towns, would not improve accessibility to services and facilities, particularly for the young and old.
8. Encourage and facilitate increased engagement in cultural and leisure activities	~	~	(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)	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	~	~	?	Will depend on specific locations for development. Generally, sites exist beyond flood risk areas, although still several villages where known flood risk issues, including Robertsbridge. 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)	Arguable that more housing may increase impacts on the range of species and habitats, both directly and indirectly.
15. Protect and enhance the high quality natural and built environment, including landscape and townscape character and particularly the protection of the High Weald AONB.	(✓)	(✓)	(✓)	Some 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.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	~	(X)	Inevitable link to scale of development, as well as areas of sustainable management, but marginal differences between options.
<b>Conformity with other policy/initiatives:</b> Would conserve the character of the countryside, especially the High Weald AONB, in line with national and regional policies, as well as provide housing to help meet local needs.				
<b>Non-conformity:</b> Unlikely to sufficiently contribute to fully meeting the housing requirement in the South East Plan and the Government's (nation-wide) aim for increased housing supply.				



Rural Areas Option 2 - Proposed Submission Core Strategy level of growth plus 10%				
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 contributes more than Option 1 to housing provision, and may meet requirements depending on preferred options elsewhere.
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)	Similar to Option 1, but more housing in settlements with lesser education facilities and poorer access to larger towns.
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 over Option 1 unlikely to have material impact on economic activity.
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.
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	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	~	?	?	Will depend on specific locations for development. Generally, sites exist beyond flood risk areas, although still several villages where known flood risk issues, including Robertsbridge. 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)	Arguable that more housing may increase impacts on the range of species and habitats, both directly and indirectly.
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)	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.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	(X)	(X)	Inevitable link to scale of development, as well as areas of sustainable management, but marginal differences between options.
<b>Conformity with other policy/initiatives:</b> Should help achieve housing target of South East Plan, subject to growth elsewhere in the district. Also, should not adversely impact on character of settlements in the AONB or on the settlement pattern in rural areas.				
<b>Non-conformity:</b> Some risk of adverse cumulative impact on AONB character, but within tolerances accepted under Option 1.				

Rural Areas Option 3 - Proposed Submission Core Strategy level of growth plus 20%				
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	(✓)	(✓)	(✓)	Somewhat greater contribution to housing provision than Option 2, and gives more scope to achieve requirement if not much more potential elsewhere.
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)	Similar to Option 1, but more housing in settlements with lesser education facilities and poorer access to larger towns. Additional homes, relative to Option 2 unlikely to be materially different in terms of implications for this objective.
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 over Option 2 unlikely to have material impact on economic activity.
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.
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	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, including Robertsbridge. 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.
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. Even greater prospect of adverse impact if focus on particular settlements changes overall dispersed settlement pattern, which is characteristic of the High Weald.
16. Reduce waste generation and disposal, and achieve the sustainable management of waste	~	(x)	(x)	Inevitable link to scale of development, as well as areas of sustainable management, but marginal differences between options.
<b>Conformity with other policy/initiatives:</b> Would help achieve housing target of South East Plan, with relatively less reliance on additional capacity for growth elsewhere.				
<b>Non-conformity:</b> Risk of adverse cumulative impact of more development in the AONB, as well as on character of individual villages as a result of more development.				