

Sustainability Appraisal/Strategic Environmental Assessment Scoping Report

In support of the:

**Rother District Council and Hastings Borough Council
Local Plan Updates (2019-2039)**

**Main Document
(January 2021)**



The following report was initially published in April 2020, and was revised following formal consultation to provide a baseline report for the purposes of Rother District's and Hastings Borough's respective Local Plans.

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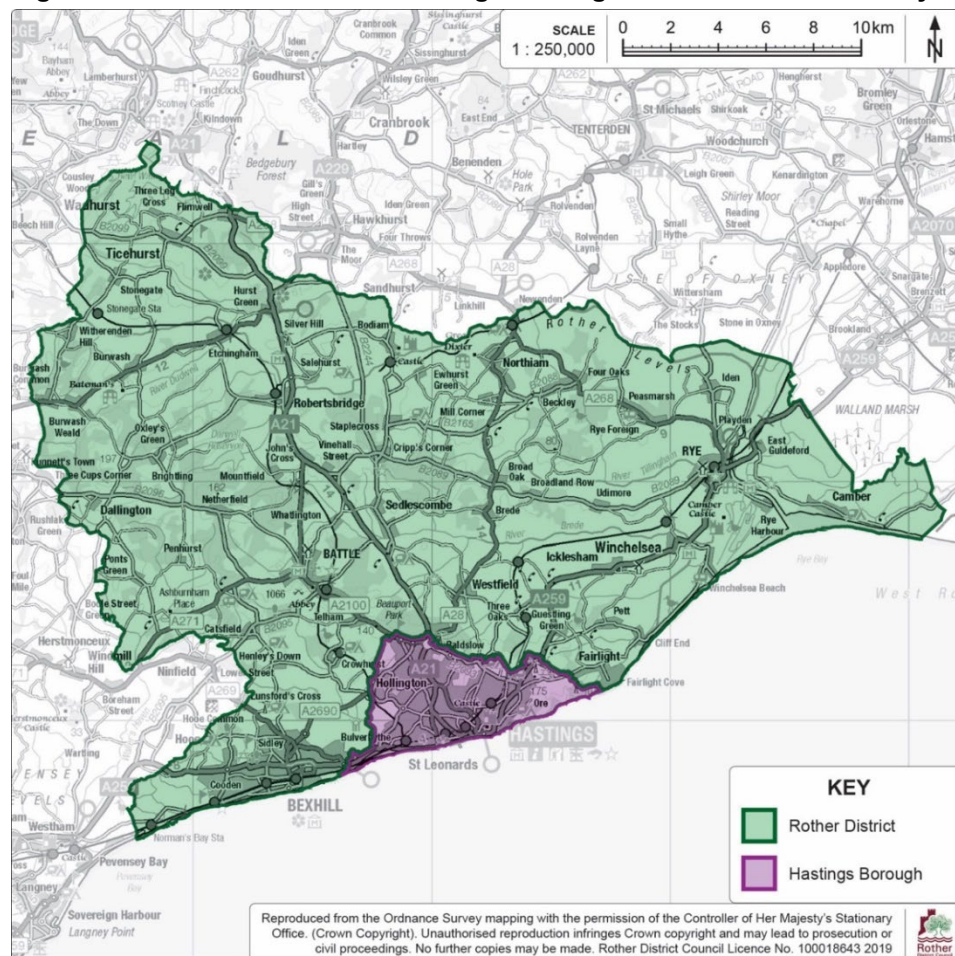
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1. INTRODUCTION

Background

1. Rother District Council (RDC) and Hastings Borough Council (HBC) are developing new local plans for their respective areas to bring their policies up to date and ensure they are fit for purpose. RDC and HBC are working closely on their local plan update to ensure that the spatial development strategies pursued are effective and any cross-boundary impacts are properly considered. Both Councils have agreed the benefits of working together on a joint Sustainability Appraisal Scoping Report, as part of the initial stages of production of each Local Plan. The geography of the authority areas, with Rother District wrapping around Hastings Borough (see Figure 1a), and the functional links between the local economies of Rother and Hastings and location within the same housing market area results in the need for a coherent and complementary approach to future plan-making.

Figure 1 – Rother District and Hastings Borough Council Local Authority Boundaries



2. Rother District covers some 200 square miles, with 82% of it being located in the High Weald Area of Outstanding Natural Beauty (AONB), and approximately 18 miles of coastline. It currently has a population of around 96,000 with a forecast growth of 15.4% to 110,797 by the end of the plan period (2039) based on trend based population projections. Hastings Borough is an urban authority, much smaller in land area, with 8 miles of coastline. It currently has a population of around 94,500, with a forecast growth of 10.2% to 104,103 by 2039 based on trend based population projections. In both local authorities, the greatest proportion of employment is in the public administration, education and health sectors. In terms of the overall level of deprivation based on the Index of Multiple Deprivation (IMD) statistics, there is great disparity between Hastings which is ranked 13th and Rother which is ranked 125th most deprived out of 317 Local Authorities nationally overall. There are however pockets of deprivation for example within Sidley, Bexhill Central areas. Appendix 3 to this report includes a series of contextual indicators for both Rother District and Hastings Borough.
3. To support the development of the new local plans both authorities will undertake Sustainability Appraisal (SA). SA is tool to assess the environmental, social and economic impact of a local plan. Adopting the same framework for the SA will help ensure a joined-up approach to plan development. This report sets out the proposed scope of the SA. It identifies the framework of SA objectives that RDC and HBC authorities will use to assess their local plans. The process of SA will help ensure that the policies in the plan contribute to the achievement of sustainable development as required by the [National Planning Policy Framework \(2019\)](#).
4. When deciding on the scope and level of detail of the information that must be included in the SA report, planning authorities in England are legally required to consult Historic England, Natural England and the Environment Agency. This Scoping Report is the basis for consultation with these statutory bodies as well as inviting comments from a limited group of additional organisations given a number of **specific** issues arising from the scoping exercise related to health, transport and accessibility, the coastal context along with potential cross boundary issues which need cooperation with neighbouring authorities.
 - East Sussex County Council;
 - East Sussex NHS Clinical Commission Group¹;

¹ Please note that this was previously referred to as the Hastings and Rother CCG, and some documents reviewed may mention this title

- Sport England;
- Highways England;
- Marine Management Organisation;
- South East Coastal Group
- Other authorities neighbouring RDC: Tunbridge Wells Borough Council, Ashford Borough Council, Wealden District Council and Folkestone and Hythe District Council.

Engagement on the Local Plan

5. The standard methodology for calculating local housing need as outlined in the NPPF results in a significant increase in housing delivery to 727 homes a year in Rother and 430 homes a year in Hastings compared to presently adopted targets of 335 homes per year and 200 homes per year, respectively. This 'standard method' provides the **starting point** for plan-making but is not a housing requirement. However, it is clear that both RDC and HBC will need a plan that supports a step change and maximises housing delivery. Both Local Plans will need to justify their respective housing targets based on development constraints which affects development potential of sites. This will need to be achieved whilst ensuring other important spatial planning objectives are addressed. Not least responding to climate change. In this context Rother District Council and Hastings Borough Council welcome any further comments - beyond the specific SA matters covered in this report – to inform the early stages of plan development.

Consultation

6. Targeted consultation commenced on this report on Friday 17 April 2020 and ran for 6 weeks. Responses were sent to Rother District Council at: planning.strategy@rother.gov.uk and/or Hastings Borough Council at fplanning@hastings.gov.uk by 5pm on Friday 29 May 2020. In some cases an extension was agreed with specific organisations. Details of Scoping Report for the Rother District Local Plan Sustainability Appraisal all responses and actions can be found at Appendix A of this report.
7. It was requested that responses must include:

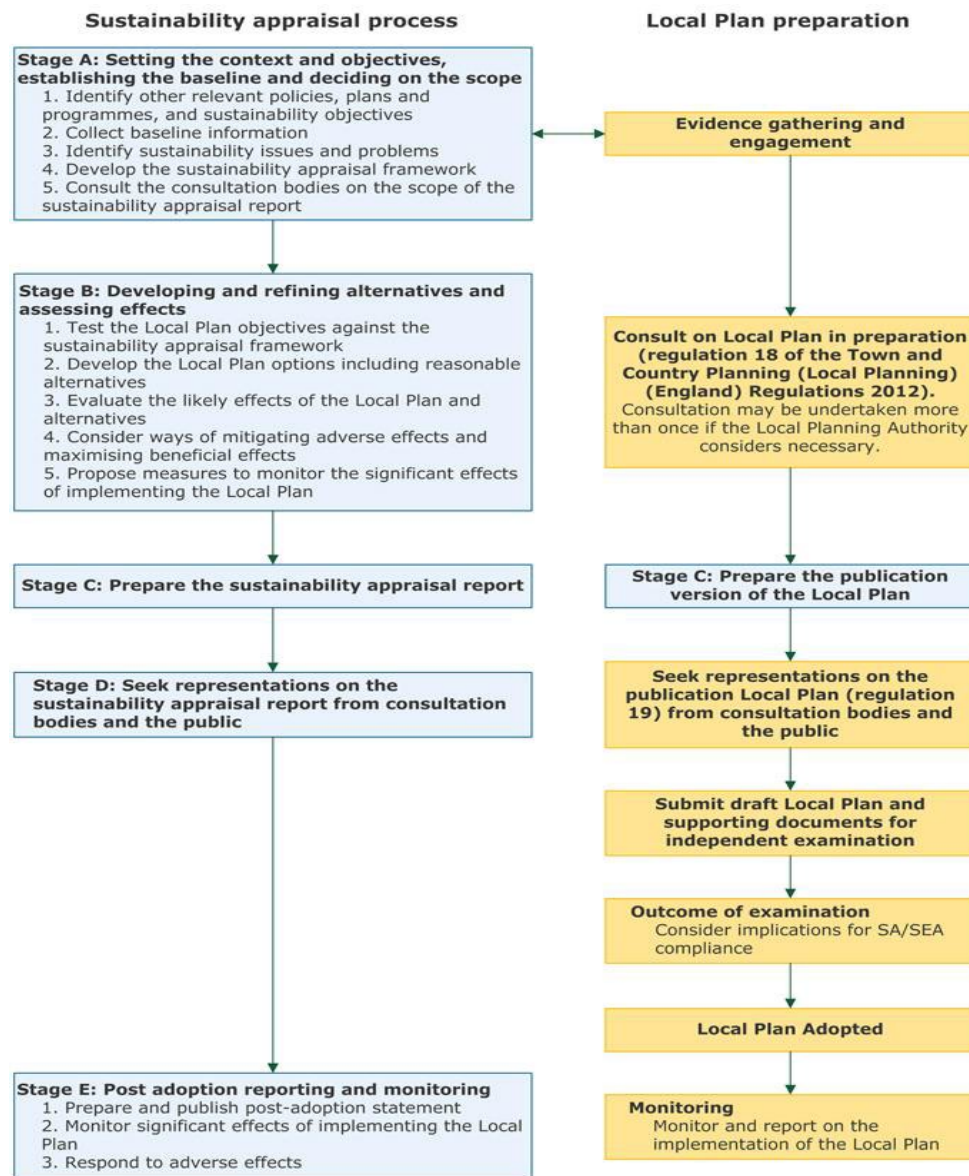
- Comments, if any, on this scoping report and the proposed SA framework
- Any specific views and comments to inform the early stage of plan making which may cover strategic matters or detailed development management or site related matters. This should be supplemented by details of relevant strategies or evidence documents where available.
- Details of the officer(s) who will be responsible for responding to the Local Plan and confirmation that resources are available to provide the input to the key plan making stages identified by each authority.

2. APPROACH TO SA SCOPING

8. The Planning and Compulsory Purchase Act 2004 establishes the legal framework, outlining the requirements for the SA of local plans. The SA process must be undertaken in accordance with the Environmental Assessment of Plans and Programmes ('SEA') Regulations 2004 (which in turn derive from the European Union Directive 2001/42/EC). The legislation requires that the SA report must be published alongside the respective Local Plans. The SA must identify, describe and evaluate the likely **significant** effects of implementing the respective Local Plans, and reasonable alternatives' on SA issues which must include: biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage and landscapes.
9. The Planning Practice Guidance (PPG) sets out five stages to the SA process for Local Plans (Stages A to E) which are illustrated in Figure 2a. The first stage of the SA (Stage A) is to identify the scope and level of detail of the information to be included in the sustainability appraisal report. It should set out the context, objectives and approach of the assessment and identify relevant environmental, economic and social issues and objectives.
10. This report presents the findings of Stage A which has culminated in a proposed framework of **20 sustainability objectives** that will be used to undertake the SA of the respective Local Plans. These sustainability objectives are informed by an assessment of the **key issues/problems** arising from a review of:

- existing plans and programmes published by Government, regional partnership bodies such as the Local Economic Partnership, East Sussex County Council, RDC, HBC or other key organisations.
 - baseline evidence on the existing environmental, economic and social characteristics of the area likely to be affected by the Local Plan updates
 - the likely evolution on the above without implementation of new policies, supported (where available) by trend / historic data
11. These objectives and the rationale for them are detailed in this report :For ease of reference these have been extracted into a list in Appendix 1-also highlights the related indicators and prompt questions to support the objectives. It also shows how the objectives relate to the matters that the SEA regulations must address as highlighted in paragraph above.
12. The review of plans and programme and baseline information is presented thematically in Sections 3 through to Section 12 of this report. This form of presentation within this this Scoping Report is intended to aid readers in observing the links between the specific social, economic and environmental issues/problems identified and the resulting objectives which define the proposed scope of the SA.

Figure 2 - Stages in the Sustainability Appraisal Process



- The United Kingdom left the European Union on 31 January 2020 and a transition period is in place until 31 December 2020 while the EU and UK negotiate new arrangements for a trade deal. Existing EU environmental law referenced throughout this document has been transferred into a new category of “retained EU law” and is accordingly reflected in this scoping report. In January 2020 the government published the [Environment Bill](#) which seeks to manage the impact of human activity on the environment, creating a more sustainable and resilient economy, and enhancing well-being and quality of

life. The [Environment Bill](#) states an intention to maintain and improve environmental designations as we leave the EU. Legislative changes arising from this Bill will be reflected in updates to the Sustainability Appraisal process as Rother District Council and Hastings Borough Council progress work on their respective plans.

14. The nature of sustainability issues result in there being cross-cutting themes which are relevant to several Sustainability Appraisal (SA) Objectives. One of these key themes is Climate Change which is relevant and related to several of the SA Objectives and as such influences heavily the review of plans and programmes, and the determination of key issues, from which sustainability objectives are then devised.

3. AIR QUALITY

Relevant Plans and Programmes

International

15. Key plan and programmes at the international level include:
 - [UN Resolution 2015 Transforming our world: the 2030 Agenda for Sustainable Development \(2015\)](#): 17 Sustainable Development Goals have been identified as part of a universal call to action to end poverty, protect the planet and improve the lives and prospects of everyone. The 17 Goals were adopted by all UN Member States in 2015, as part of the 2030 Agenda for Sustainable Development which set out a 15-year plan to achieve the Goals. Goal 3 relates to health and includes a resolution to substantially reduce the number of deaths and illnesses from hazardous chemicals and air, water and soil pollution and contamination by 2020. Actions related to Goal 11 on cities includes a commitment to reduce the adverse per capita environmental impact of cities, including by paying special attention to air quality and municipal and other waste management.

- [European Air Quality Framework Directive \(1996\) and Air Quality Directive \(2008\)](#): Put in place measures for the avoidance, prevention, and reduction in harmful effects to human health and the environment associated with ambient air pollution and establish legally binding limits for the most common and harmful sources of air pollution.
- [European Industrial Emission Directive \(2010\)](#): Lays down rules on integrated prevention and control of pollution arising from industrial activities. It also lays down rules designed to prevent or, where that is not practicable, to reduce emissions into air, water and land and to prevent the generation of waste, in order to achieve a high level of protection of the environment taken as a whole.

National

16. The [National Planning Policy Framework \(2019\)](#) highlights a number of measures/actions related to air quality. These are extracted below:
 - Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas.
 - Opportunities to improve air quality and mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications.
 - Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.
 - New and existing developments and the residents who reside in them, should be prevented from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution.

17. The Air Quality Standards Regulations 2010 transpose into UK law the Ambient Air Quality Directive (2008/50/EC) which sets legally binding limits for outdoor concentrations of major air pollutants which impact public health.
18. The Government's 25 Year Environment Plan was published in 2018 and presents the *"goals for improving the environment within a generation, and leaving it in a better state than we found it"*. It includes actions to: reduce pollution by tackling air pollution in our Clean Air Strategy and reduce the impact of chemicals.
19. The 'UK plan for tackling roadside nitrogen dioxide concentrations' was published in July 2017. This is the air quality plan for bringing nitrogen dioxide within statutory limits in the shortest possible time. The plan identifies a range of investment projects to lower the environmental impact of motoring this includes a high level of investments in ultra-low emission vehicles (ULEVs) and related grants aimed at supporting air quality improvements.
20. The Department for Transport document, The Road to Zero (2018) sets out new measures towards cleaner road transport, aiming to put the UK at the forefront of the design and manufacturing of zero emission vehicles. It explains how cleaner air, a better environment, zero emission vehicles and a strong, clean economy will be achieved. One of the main aims of the document is for all new cars and vans to be effectively zero emission by 2040. The government is currently [consulting](#) on whether to bring forward this deadline to 2035.
21. The following documents are also of relevance, as indicated in Planning Practice Guidance (PPG) :
 - the [UK Air Information Resource \(UK-AIR\)](#), which contains information on historic and current air quality across the UK, including a [portal](#) of Defra's national assessment against relevant Limit Values and air quality management areas;
 - [air quality management area records](#) and [modelled background pollution concentrations](#);
 - the [National Atmospheric Emissions Inventory](#) for emissions of air pollution including maps at a 1km by 1km resolution for a wide range of pollutants;

- the [Pollutant and Release Transfer Register](#), which has links to emissions from installations permitted under the Environmental Permitting Regulations, which is useful for point sources;
- the [Clean Air Strategy](#) sets out actions for dealing with 5 major sources of air pollution. A detailed [National Air Pollution Control Programme](#) was published by the Department for Environment, Food and Rural Affairs in April 2019.
- [Biodiversity 2020: A strategy for England's Wildlife and Ecosystem Services](#), sets out a comprehensive picture of how government are implementing their international and EU commitments.

Regional and County

22. The Sustainable Community Strategy - Pride of Place sets out ten environmental principles for East Sussex including the reduction of greenhouse emissions and improving the quality of the environment and people's health by reducing air and noise pollution. The strategy highlighted that air pollution from traffic exceeded national objectives in some areas and that East Sussex has some of the highest levels of ozone in the country. In response it identifies measures to reduce emissions and air pollution whilst also acknowledging the opportunities to link them to tackling climate change. The Community Strategy (Pride of Place) went out of date in 2009. Since that point, the East Sussex Strategic Partnership (ESSP) have maintained a vision and set of priorities which can be seen on their website: <http://www.essp.org.uk/What-we-do/Pride-of-Place.aspx>.

23. The recently produced [Environment Strategy for East Sussex \(2020\)](#) seeks to: 'Protect and enhance our natural and built environment for current and future generations and tackle and adapt to climate change. Five priority environmental themes have been identified aligning with international and national policy, these are: climate change, natural capital, air quality, water and resource efficiency. In relation to air quality the key action identified is to develop a Local Cycling and Walking Infrastructure Plan.
24. Rother has its own LSP which delivers an annual action plan which is a collaboration of a number of statutory and voluntary organisations. Last year's action plan can be found here: <http://www.rotherlsp.info/13374>. This year's action plan has not been published yet. Hastings Borough Council have developed a Hastings and St Leonards Sustainable Community Strategy (2009-2026) which outlines how they are working with the police, health authority, and many other partners to deal with the issues that affect the town. In July 2012 the Hastings LSP revised the Community Strategy targets from those agreed in the 2009-2026 Strategy to recognise changes in economic circumstances.
25. [The Sussex Air Quality Partnership \(Sussex-Air\)](#) aims to drive improvements in air quality (and carbon reduction) in Sussex. The partnership is made up of representatives from local authorities in East and West Sussex, the Sussex Health Protection Agency, Sussex Primary Care Trusts, the Environment Agency, the University of Sussex and the University of Brighton. The aim of the partnership is to assist partners to comply with their statutory Local Air Quality Management (LAQM) duties and contribute to improving air quality and health in Sussex. The Business Plan 2019/2020 seeks to deliver a work programme to: improve the local air quality evidence base; improve information and advice to the public; outline DEFRA grant projects; and coordinate partnership communications. The 5 key objectives of the Partnership, include:
- Providing advice and support and improving expertise and knowledge base;
 - Project development and implementation;
 - Partnership working;
 - Developing cross cutting work on health improvement, climate change, environment and transport; and
 - Communicating air quality issues and initiatives in Sussex.

26. [The East Sussex County Council Local Transport Plan \(2011 to 2026\)](#) sets out the County's direction for planning and providing the transport infrastructure and services that are needed to deliver sustainable economic growth and support additional housing in the county during this period. The vision for the plan includes delivering a high quality environment. It recognises that most of the air pollution in the county is generated by road traffic and includes measures that focus on reducing emissions. This includes reducing the need to travel; promotion of different modes of transport; and supporting local authorities to carry out air quality reviews and the preparation of air quality action plans.
27. Lobbying the train operating companies to maintain and enhance rail capacity and services to accommodate growth in the area is a key element of the strategy along with the priority for high speed rail on the coastal stretch of the line between Eastbourne and Rye, with further improvements to the connectivity with Kent. The timetabling and capacity issues in relation to services on this line are being explored by Network Rail, along with identifying station service accessibility improvements across the County. The Transport Plan also identifies an action to develop a Quality Bus Partnership for Bexhill and plans to focus on improving services and infrastructure on the following key bus corridors: A259 Bexhill to Hastings/Ore; London Road/Battle Road; Core 'Arrows' routes network running east/west across the town and through the town centre, and Conquest Hospital and Bexhill & Hastings Colleges.
28. There is focus on new walking routes in Hastings and Bexhill as well as cycle "focusing on key routes into the town centre, along the seafront and providing links to existing and future residential and employment areas" (page 20). Measures related to on-street parking management in Hastings are also highlighted along with promotion of travel plans with businesses and schools through the County's 'Travelchoice' brand; to encourage behaviour change. See also section 12 of this report related to transport matters.

Local

29. Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. There is also often a strong correlation with equalities issues, because areas with poor air quality are also often the less affluent areas.
30. Local Planning Authorities are required to publish annual Air Quality Annual Status Reports (ASRs) to discharge their monitoring obligations under Part IV of the Environment Act (1995). Part IV of the Environment Act 1995 and Part II of the Environment (Northern Ireland) Order 2002 requires local authorities in the UK to review air quality in their area and designate air quality management areas if improvements are necessary. Where an air quality management area (AQMA) is designated an air quality action plan must then be put in place. In this context, Hasting Borough Council published its most recent Air Quality Annual Status Reports in 2020 Rother DC produced its most recent Air Quality Report for the 2019 period in February 2020.
31. [Rother District Council's Draft Environment Strategy \(February 2020\)](#) sets out the Council's vision for reducing its impact on the environment, including detailed action plans to make Rother District carbon neutral by 2030. It identifies a need for a co-ordinated approach working closely with district leaders and stakeholder partners and identifies a range of priority areas including air quality and a series of actions which relate to promoting more sustainable transport options (and are detailed further in section 12 of this report which relates to Transport).

Baseline and Trends

32. Rother District Council manages local air quality in close collaboration with East Sussex County Council, which provided part of the monitoring until 2014, and with the Sussex Air Quality Partnership (Sussex Air). The partnership provides assistance to members and information to the public via its web-site with recent air quality data, news updates, educational resources, links and other services such as airAlert.

33. In recent years, local monitoring has identified elevated levels of NO₂ at three roadside locations (Rye South Undercliff, High Street Flimwell and A2100 Beauport Park). NO₂ levels at these locations in 2013 and 2014 exceeded, or were close to exceeding the UK Air Quality Objective for annual mean NO₂. In 2015, all monitoring locations in the District achieved the objective, with concentrations lower than 40 µg/m³. In 2016 however, concentrations exceeded the objective at A2100 Beauport Park and High Street Flimwell, although concentrations in 2017 and 2018 returned to below the objective at these locations and all others.
34. PM₁₀ is monitored in Rother at De La Warr Road, Bexhill, and in recent years concentrations have been generally low (well below the UK annual mean objectives), with no significant increasing or decreasing tendency, although there is some year-on-year variability.
35. Annual mean NO₂ concentrations recorded at continuous monitors and diffusion tubes in Rother District are within the air quality annual mean objective of 40 µg/m³, and there were no exceedances of the short term hourly objective.
36. There were also no exceedances (exceedance levels stated at Figure 3a) of either the annual mean or daily mean PM₁₀ objectives in 2018, or for the previous years from 2013.

Figure 3a - Pollution exceedance levels

Pollutant	Air Quality Objective ²	
	Concentration	Measured as
Nitrogen Dioxide (NO ₂)	200 µg/m ³ not to be exceeded more than 18 times a year	1-hour mean
	40 µg/m ³	Annual mean
Particulate Matter (PM ₁₀)	50 µg/m ³ , not to be exceeded more than 35 times a year	24-hour mean
	40 µg/m ³	Annual mean

² The units are in microgrammes of pollutant per cubic metre of air (µg/m³).

37. In conclusion, monitoring has shown that air quality in Rother District continues to meet the air quality objectives at locations of relevant exposure. Rother District is committed to taking action to nonetheless improve air quality, in particular through involvement with the Sussex Air Quality Partnership. Priority measures and actions for the District include the roll-out and expansion of electric charging points via the Energise Network, collaboration between departments on health improvement, climate change, environment and transport, and maintaining and updating the website, airAlert scheme and monitoring network.
38. Air Quality Management Areas (AQMAs) are declared when there is an exceedance or likely exceedance of an air quality objective. After declaration, the authority must prepare an Air Quality Action Plan (AQAP) within 12-18 months setting out measures it intends to put in place in pursuit of compliance with the objectives. Rother District currently does not have any AQMAs, because previous monitoring and modelling studies have not indicated any likelihood of the UK air quality objectives being exceeded. Since Rother District has no AQMAs, no formal Air Quality Action Plan has been implemented for the District.
39. The main challenge for air quality management in Rother District is likely to be the careful management of planning applications and developments through detailed and rigorous air quality assessments, particularly where multiple developments may occur close together, in order to help maintain the generally good levels of local air quality that are currently experienced across the District.
40. Hastings undertook automatic (continuous) monitoring at an automatic air quality monitoring station (AQMS) in Bulverhythe (roadside) and at a network of 14 NO₂ diffusion tubes. The Council worked with partners to take forward several initiatives to improve air quality, such as working together with partners at Sussex Air and utilizing the “Air quality and emissions mitigation guidance for Sussex” document that was updated in June 2019.
41. Hastings Borough Council has identified road traffic as the main source of pollution, with the most significant pollutants being NO₂, PM₁₀, and PM_{2.5}. Monitoring data shows that the AQMS and network of 14 sites recorded the following for NO₂ and PM₁₀ (Figure 3b):

Figure 3b - Air Quality Monitoring for Hastings BC

Monitoring Site	Pollutant	Monitoring Period	Air Quality Objective	Result
Automatic Air Quality Monitoring Station (AQMS) x	NO ₂	1-hour mean	Exceedances of the NO ₂ 1-hour mean objective (200µg/m ³ not to be exceeded more than 18 times/year)	No exceedance between 2014 and 2018
	PM ₁₀	24-hour mean	Exceedances of the PM ₁₀ 24- hour mean objective (50µg/ m ³ not to be exceeded more than 35 times/ year	No exceedance between 2014 and 2018
	PM ₁₀	Annual mean	Exceedances of the PM ₁₀ annual mean objective of 40 µg/m ³	No exceedance between 2014 and 2018
Network of 14 Non- Automatic Monitoring Sites	NO ₂	Monthly mean for 2018	Exceedances of the NO ₂ annual mean objective of 40 µg/m ³	Higher mean exceedances recorded in March and July in at least 4 sites
		Annual mean	Exceedances of the NO ₂ annual mean objective of 40 µg/m ³	No exceedances above mean since 2015

42. There are currently no active Air Quality Management Areas in Hastings Borough. The Bulverhythe AQMA, which was declared for exceedances of the 24-Hour Mean PM₁₀ (35 exceedances of 50µg/m³ per annum), was revoked in April 2017.

43. Local monitoring shows that air quality in Hastings is good and there are no locations where pollution levels currently exceed the UK Air Quality Objectives. However, in 2018 local monitoring identified three locations along Bexhill Road where pollutant concentrations were close to exceeding the UK Air Quality Objective for NO₂ (within 10%). Whilst concentrations of NO₂ and PM₁₀ have declined since 2014, the monitoring data from 2018 show no strong evidence of a continued decline when compared to 2017 data.

Key issues

44. The following key issues emerge from the review of relevant plans and programmes and baseline review:
- Increased development has the potential to lead to increase air quality impacts from increased traffic movements, unless a modal shift away from car use to sustainable transport measures is achieved;
 - decarbonisation and the links to air quality and transport in general is a key issue , including the role that transport must play in reducing carbon emissions
 - Technological improvements are likely to have an impact on air quality levels over the long term which will assist the Council's ability to improve air quality, e.g. ultra-low emission vehicles.
45. The likely evolution without the Local Plan Update is:
- Failure to promote more sustainable modes of transport could contribute to slow or no improvement in air quality levels or even increase the current levels of pollution.

Sustainability Objective(s)

46. In light of the key issue discussed above it is proposed that the SA should include the following objective:
- **Reduce air pollution from transport and development and improve air quality..**

4. BIODIVERSITY

Relevant Plans and Programmes

International

47. Key plan and programmes at the international level include:

- [UN Resolution 2015 Transforming our world: the 2030 Agenda for Sustainable Development \(2015\)](#): 17 Sustainable Development Goals have been identified as part of a universal call to action to end poverty, protect the planet and improve the lives and prospects of everyone. The 17 Goals were adopted by all UN Member States in 2015, as part of the 2030 Agenda for Sustainable Development which set out a 15-year plan to achieve the Goals. Goal 15 is to *‘Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss’*. It highlights the need to *‘Take urgent and significant action to reduce the degradation of natural habitats, halt the loss of biodiversity and, by 2020, protect and prevent the extinction of threatened species’*.
- [International Convention on Wetlands \(Ramsar Convention\) \(1976\)](#): International agreement with the aim of conserving and managing the use of wetlands and their resources.
- [European Convention on the Conservation of European Wildlife and Natural Habitats \(Bern Convention\) \(1979\)](#): Aims to ensure conservation and protection of wild plant and animal species and their natural habitats, to increase cooperation between contracting parties, and to regulate the exploitation of those species (including migratory species).
- [International Convention on Biological Diversity \(1992\)](#): International commitment to biodiversity conservation through national strategies and action plans.

- [European Habitats Directive \(1992\)](#): Together with the Birds Directive, the Habitats Directive sets the standard for nature conservation across the EU and enables all 27 Member States to work together within the same strong legislative framework in order to protect the most vulnerable species and habitat types across their entire natural range within the EU. It also established the Natura 2000 network.
- [European Birds Directive \(2009\)](#): Requires the maintenance of all species of naturally occurring birds in the wild state in the European territory at a level which corresponds in particular to ecological, scientific and cultural requirements, while taking account of economic and recreational requirements.
- [Conservation of Habitats and Species Regulations 2017](#), amended by the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018) sets out requirements to determine if a plan or project may affect the protected features of a habitats site before deciding whether to undertake, permit or authorise it.

National

48. The [National Planning Policy Framework \(2019\)](#) highlights a number of measures/actions related to biodiversity. These are extracted below:
- One of the three overarching objectives of the NPPF to contribute to protecting and enhancing our natural, built and historic environment including by helping to improve biodiversity
 - Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape across local authority boundaries.

- Planning policies and decisions should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with the statutory status or identified quality in the development plan); and minimising impacts on and providing net gains for biodiversity, including establishing coherent ecological networks that are more resilient to current and future pressures.
 - To protect and enhance biodiversity and geodiversity, plans should:
 - Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
 - Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.
 - Take a proactive approach to mitigating and adapting to climate change, considering the long-term implications for biodiversity.
 - The presumption in favour of sustainable development does not apply where development requiring appropriate assessment because of its potential impact on a habitats site is being planned or determined.
49. [The Government's 25 Year Environment Plan \(2018\)](#) sets out a strategy for managing and enhancing the natural environment, embedding 'net gain' principles as key to environmental considerations.
50. [The UK Biodiversity Action Plan \(BAP\)](#) identifies priority species and habitats requiring conservation action. Although the UK BAP has been superseded, BAP priority species and habitats have been used to draw up statutory lists of priority species and habitats in England.
51. As noted in the introduction the [Environment Bill](#) has been published and contains binding targets on biodiversity net gain.

Regional and County

52. The [Environment Strategy for East Sussex \(2020\)](#) seeks to: ‘Protect and enhance our natural and built environment for current and future generations and tackle and adapt to climate change. Five priority environmental themes have been identified aligning with international and national policy, these are: climate change, natural capital, air quality, water and resource efficiency. It identifies natural capital as “the stock of renewable and non-renewable resources (e.g. plants, animals, air, water, soil) that yield a flow of benefits to people, including food, fuel, clean water, climate regulation, pollination of crops by insects and flood defence” (page 8). An action is identified to develop a Natural Capital Investment Plan.
53. [The Sussex Biodiversity Records Centre](#) provides environmental information services encompassing biodiversity, geodiversity and other aspects of Sussex’s natural capital. The Centre is focussed on improving evidence and ensuring it is accessible to inform planning, decision making and nature conservation. They provide a single shared evidence base to support the collaboration and effectiveness of local authorities and other public bodies policies and plans. Information for plan making includes:
- Protected, priority and invasive species;
 - Priority habitats;
 - International, national and locally designated sites of importance for biodiversity and geodiversity;
 - Landscape-scale natural areas;
 - Green infrastructure and greenspace information; and
 - Ecosystems services and ecological networks mapping.
54. [The Sussex Biodiversity Partnership](#) was comprised of representatives from a range of organisations including local government. Their aim was to conserve and enhance the biological diversity of Sussex, contributing to international biodiversity objectives and enhancing quality of life in the county. They developed a Sussex Biodiversity Action Plan (2010) with delivery focussed on Biodiversity Opportunity Areas (BOAs). The BOAs were set up to represent the targeted landscape-scale approach to conserving biodiversity in Sussex.

55. [The Sussex Local Nature Partnership](#) published their Natural Capital Investment Strategy for Sussex in December 2019. The strategy seeks to guide their approach to directing investment in nature, across the terrestrial, coastal and marine environments, for the next 5 year period and beyond. The Strategy provides an initial strategic assessment of how best to focus effort, resources and funds to protect and enhance the stock of natural capital assets for the benefit of nature and people. It also identifies opportunities to use a natural capital approach to deliver specific outputs as well as guidance on the steps needed to take this broad spatial strategy forward into action and outcomes on the ground.
56. Biodiversity Opportunity Areas were defined in a project lead by the South East Biodiversity Forum in 2008. They present the best opportunity for enhancing biodiversity in a local area, often being buffers around existing reserves or linkages between existing sites. Sites in Rother District and/or Hastings Borough include:
- Pevensey Levels,
 - Combe Haven and Marline,
 - Bexhill Fringe,
 - Romney Marsh Area,
 - Hastings Fringe,
 - Rother, Brede and Tilingham Woods,
 - Bewl Water,
 - Pevensey Rother and Cuckmere Watershed.

The [Environment Agency ' River Basin Management Plan South East River Basin District \(2009\)](#) is a set of documents that set out the 2009 objectives for protecting and improving the water environment under the Water Framework Directive, and the programme of measures to achieve them

Local

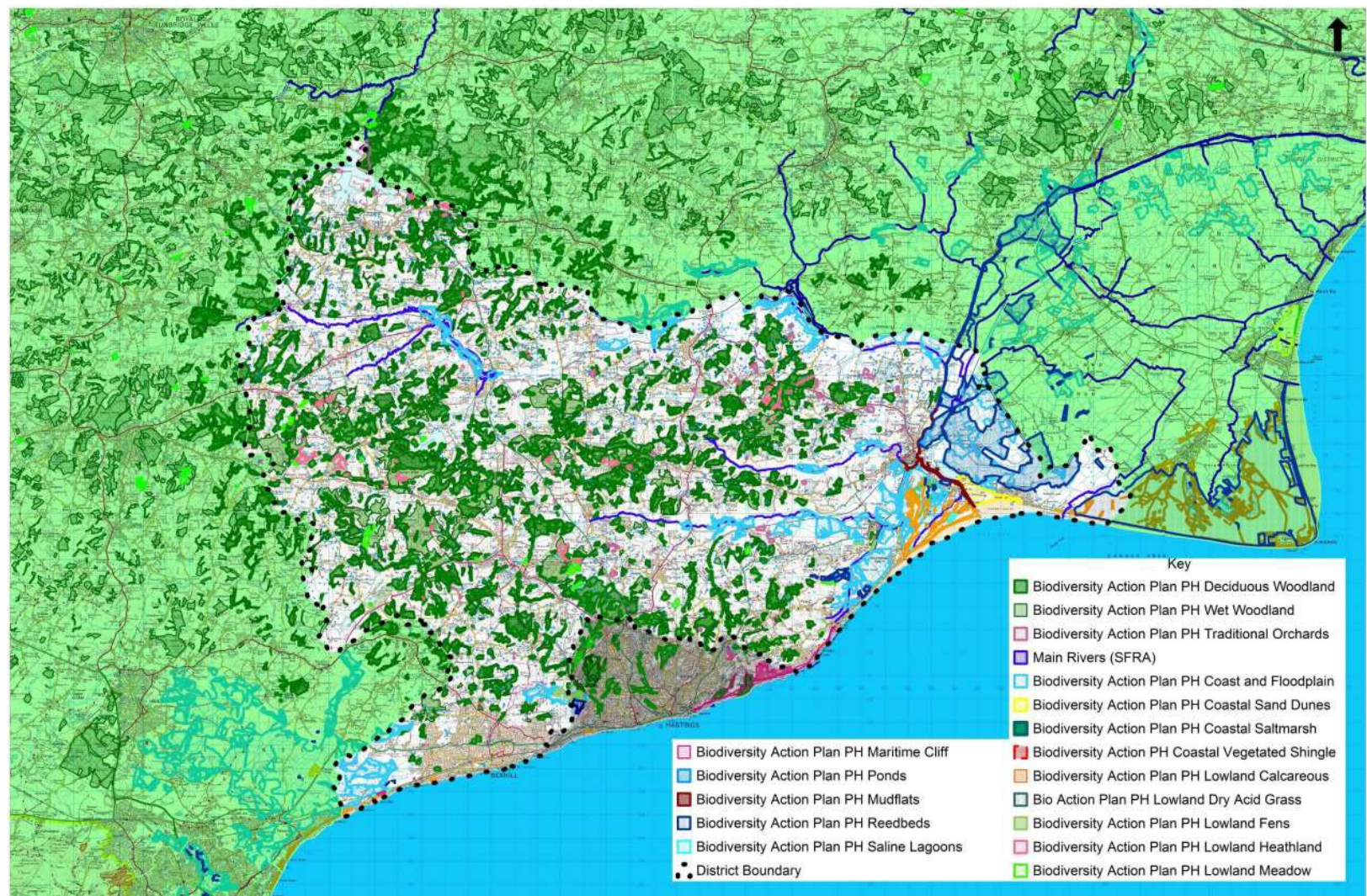
57. Rother District Council has a number of Biodiversity Action Plan (BAP) areas for priority habitats across the District (see figure 4a). They do not receive statutory protection but are protected under the NPPF. There are also a

number of BAP and special habitats that are not mapped, including verges, hedgerows and streams, along with marine BAP habitats that fall outside the scope of the planning system, including inter-tidal chalk.

58. A Strategic Access and Recreation Management Strategy (SARMS) was prepared following a commitment from both Folkestone & Hythe and Rother District Councils. The need was identified in both Councils' Local Plan Core Strategies and supporting Habitats Regulations Assessments (HRA), which raised concerns of possible additional pressure and disturbance on the internationally important wildlife sites caused by increased recreational activities as a result of the councils' planning policies. For the overall strategy area, it was found that there was a degree of disconnect between the tourism and natural environment sectors. Raising the profile of the nature conservation value of the strategy area, through a focused partnership working towards a shared agenda, should benefit the visitor economy and move it in a more environmentally-aware and sustainable direction, which could prove mutually beneficial. The Strategy also sets out measures needed to mitigate the relevant impacts. Both Councils are committed to carrying forward the ambitions and implementing the strategy as part of the Local Plan process.

59. Hastings Biodiversity Action Plan (2006-2009) outlines a series of 7 sites in the green network of designated sites in the Borough and 3 Sites of Special Scientific Interest either wholly or partly in the Borough. There are 5 themes, of which theme 3 refers to planning policy and development control.
60. [Rother Green Infrastructure Study \(2011\)](#) and 2016 [addendum](#) draws out key Green Infrastructure opportunities related to individual geographic areas, namely Bexhill, Hastings Fringes, Battle Area, Rye Area, Rural Rother East and Rural Rother West. The addendum goes further by examining opportunities in relation to individual villages. A further Green Infrastructure Background Paper (2016 addendum) was produced for the Development and Site Allocations (DaSA) Local Plan which provided actions for biodiversity features that could be incorporated into the landscaping of development schemes to enhance biodiversity value and ensure net gains.
61. [Rother District Council's Environment Strategy \(February 2020\)](#) sets out the Council's vision for reducing its impact on the environment, including detailed action plans to make Rother District carbon neutral by 2030. It identifies a need for a co-ordinated approach working closely with district leaders and stakeholder partners and identifies a range of priority areas including air quality and a series of actions which relate to address biodiversity these include actions to:
- Increase tree planting and increasing tree coverage
 - Reduce verge cutting and mowing; encourage wildflowers.
 - Support homes facing medium/high risk of flooding and encouraging flood resilience/ defence measures (from a starting point of the potential benefits of trees in managing flood risk)
 - Develop a pollinator and pesticide policy which will detail how the Council will maintain, protect and enhance key habitats over the long-term for the many species of insects that pollinate crops and wildflowers and commits the Council to avoiding pesticides whenever possible on its sites including parks, recreation grounds
62. Both authorities are updating their evidence base linked to green infrastructure / infrastructure delivery plans as part of the development of the respective Local Plans.

Figure 4a - Biodiversity Action Plan Priority Habitats – this is for illustrative purposes only to show spread



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Baseline and Trends

63. Rother District Council has baseline information provided from the Sussex Biodiversity Records Centre on the condition of its SSSI's. This will be used annually to track the change in the condition of the following categories of SSSI: favourable, unfavourable recovering, unfavourable no change, unfavourable declining and no change. Areas of the District with environmental designations that are infringed by planning applications have decreased in recent years for Ramsar sites, SPA, SSSI and LWS. There has been some limited infringement on SACs and AONB.
64. Hastings and Rother are currently working to update their baseline data and has programmed further work on its Local Wildlife Sites which is seasonally dependent.

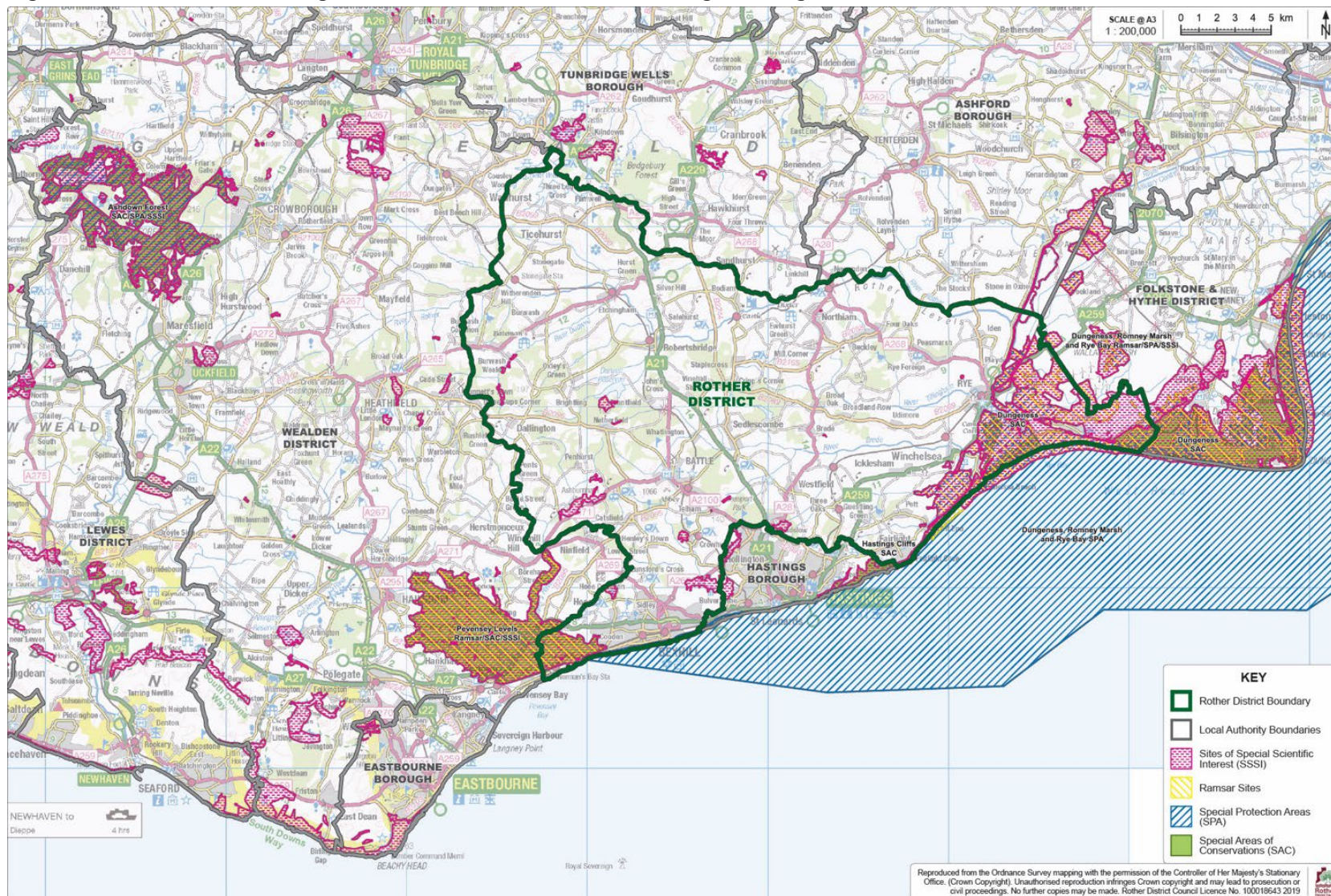
Internationally designated sites

65. There are 2 Ramsar sites located within or partially within Rother District Council: Pevensey Levels and Dungeness, Romney Marsh and Rye Bay.
66. There is 1 Special Protection Area SPA within or adjacent to the plan area in Rother and Hastings: Dungeness, Romney Marsh and Rye. The Ashdown Forest SPA is of strategic importance to Rother DC as small western parts of the District are within its 15 kilometre catchment area.
67. There are 3 Special Areas of Conservation (SACs) of importance: Hastings Cliff SAC located within Hastings and Rother and two other SACs located within Rother DC: Pevensey Levels and Dungeness SAC. The Ashdown Forest SAC is of strategic importance to Rother DC as small western parts of the District are within its 15 kilometre catchment area.
68. A map (Figure 4b) providing the boundaries of the Ramsar sites, SPAs and SACs can be found below, along with the SSSI designations.

Nationally designated sites

69. There are 3 Sites of Special Scientific Interest (SSSIs) in Hastings and 21 in Rother. These SSSIs are shown in Figure 4c below, along with their condition as recorded by Natural England. Information on Natural England (2018) Designated Sites are also available on the: [Designated Site View – Natural England](#).

Figure4b - Environmental Designations in Rother District and Hastings Borough

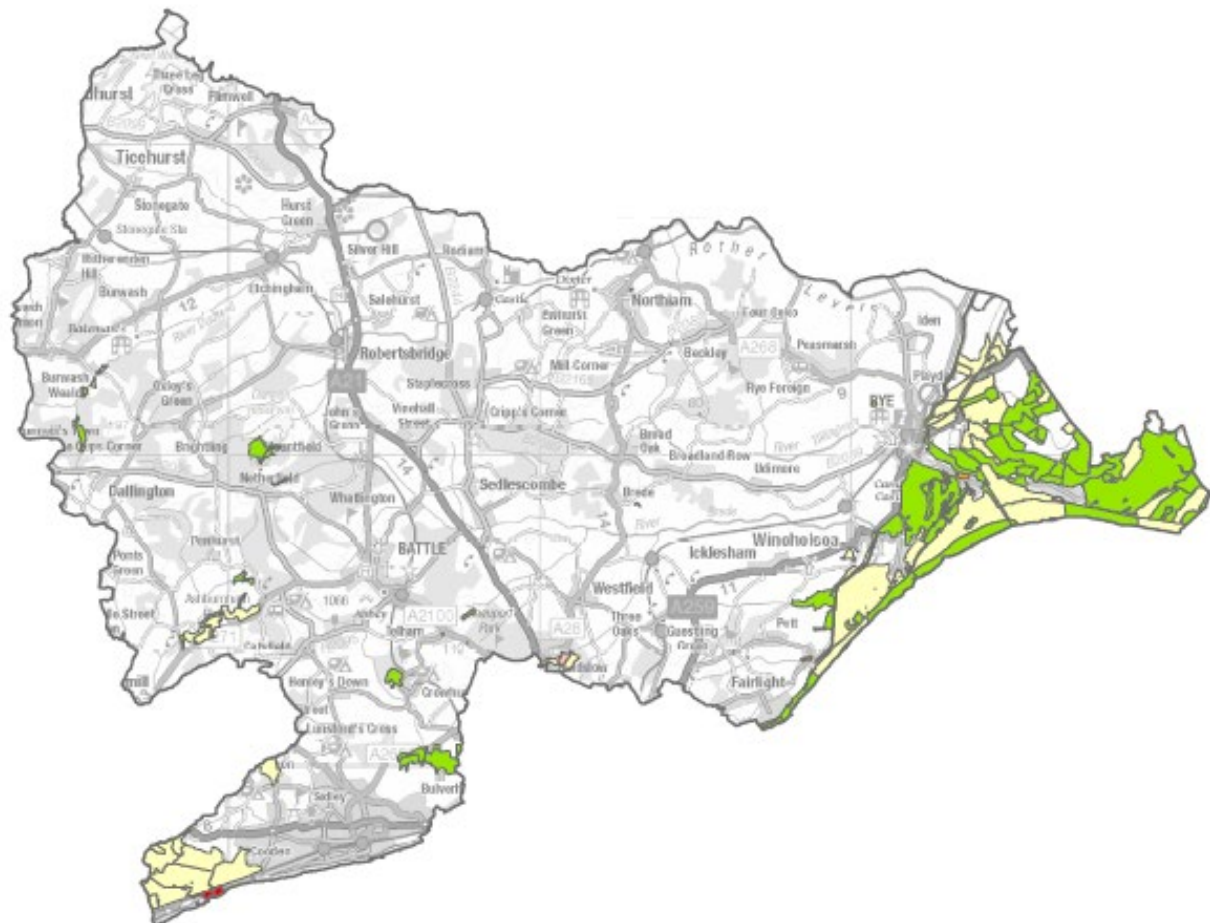


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Figure 4c - SSSI Unit conditions

SSSI unit condition within Rother District

January 2020.



Key to Map:

□ District boundary

SSSI Unit Condition

- FAVOURABLE (83 units, 2434.1ha)
- UNFAVOURABLE RECOVERING (47 units, 2140.0 ha)
- UNFAVOURABLE NO CHANGE (2 units, 8.9ha)
- UNFAVOURABLE DECLINING (2 units, 9.9ha)
- PART DESTROYED (1 unit, 17.84ha)

Statutory designated site boundaries supplied by Natural England.
Contains public sector information licensed under the Open Government Licence v3.0.

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0 5 10 Km



70. There is one Marine Conservation Zone (MCZ) that abuts Hastings and Rother (see 4d). It is called the Beachy Head East MCZ and has an area of 195 km². Natural England is the responsible agency.
71. There is 1 National Nature Reserve (NNR) within the Rother plan area. It is the Pevensey Levels National Nature Reserve. It is 4,300 ha in size but only 6.86 ha of this area is within Rother District.

Figure 4d - Beach Head East Marine Conservation Zone



72. There are 1,324 woodland parcels of designated Ancient Woodland, in Rother District totalling 8,053 ha (figure sourced from the 2019 Biodiversity AMR). In Hastings there are 60 woodland parcels totalling 145 ha (figure sourced from the 2010 Ancient Woodland Inventory as this is the most up to date statistic for Hastings).

Locally designated sites

73. Rother District has 60 Local Wildlife Site designations, whereas Hastings Borough has 25. These are very different in their nature due to the rural and urban nature of each local authority. Both Councils are undertaking a review of their Local Wildlife Sites as part of the Local Plan update process to assess the continued designation of sites and any relevant boundary reviews. These sites contain important flora and fauna, that is not necessarily protected by national or international designations.

Baseline and Trends

74. The Councils will use data on the infringement of planning applications on key habitats as a tool to monitor performance, with reductions in the area infringed sought, down to a level of zero. It will also use annual monitoring on the condition of Sites of Special Scientific Interest (SSSI).

Key issues

75. The following key issues emerge from the review of relevant plans and programmes and baseline review:
- Development has the potential to negatively impact biodiversity and environmental designations, e.g. Local Wildlife Sites in Rother District.
 - There is significant importance placed in ensuring that Biodiversity Net Gain, green infrastructure and habitat connectivity is delivered and enhanced through future development.
 - The lack of active monitoring in Hastings Borough poses a potential risk to the integrity of its natural capital.
 - The limited infringement of special areas of conservation and AONB in Rother.
76. The likely evolution without the Local Plan Update is:
- Potential continued deterioration of sites that are designated for their environmental importance.

Sustainability Objective(s)

77. In light of the key issues discussed above it is proposed that the SA should include the following objective:

- **Biodiversity is protected, conserved and enhanced.**

5. ENERGY AND WATER CONSUMPTION

Relevant Plans and Programmes

International

78. Key plan and programmes at the international level include:

- [UN Resolution 2015 Transforming our world: the 2030 Agenda for Sustainable Development \(2015\)](#): 17 Sustainable Development Goals have been identified as part of a universal call to action to end poverty, protect the planet and improve the lives and prospects of everyone. The 17 Goals were adopted by all UN Member States in 2015, as part of the 2030 Agenda for Sustainable Development which set out a 15 year plan to achieve the Goals. Goal 13 is to *'take urgent action to combat climate change and its impacts and includes commitments to: Integrate climate change measures into national policies, strategies and planning'*. Goal 7 is relevant and is to *'ensure access to affordable, reliable, sustainable and modern energy for all'* and includes actions to increase the renewable energy and improve energy efficiency and to promote investment in energy infrastructure and clean energy technology. Goal 6 relates to ensuring availability and sustainable management of water and include action to, *'by 2030, substantially increase water-use efficiency across all sectors and ensure sustainable withdrawals and supply of freshwater ...'*
- [United Nations Paris Climate Change Agreement \(2015\)](#): International agreement to keep global temperature rise this century well below 2 degrees Celsius above pre-industrial levels.

National

79. [The National Planning Policy Framework \(2019\)](#) highlights a number of measures/actions related to climate change and related energy and water consumption matters. These are extracted below:

- *Contribute to protecting and enhancing our natural, built and historic environment' including by 'mitigating and adapting to climate change' and 'moving to a low carbon economy (Para. 8c).*

- *The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure (Para. 148).*
 - Local Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.
 - Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning.
 - Taking a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for water supply.
80. [The UK Climate Change Act](#) (as amended in 2019) established a framework to develop an economically credible emissions reduction path. It also highlighted the role it would take in contributing to collective action to tackle climate change under the Kyoto Protocol, and more recently as part of the UN-led Paris Agreement. The significant amendment to the Act in 2019 requires carbon neutrality through a change from 80% to 100% reduction by 2050.

•

Regional and County

81. The Southern Water ['Water Resource Management Plan'](#) 2020-2070 sets out how the company intends to supply healthy, reliable drinking water to more than one million homes and businesses for the next 50 years. It is published every five years to reflect changes in customer views, the need to protect the environment and the latest information on climate change and housing growth

figures. It highlights a number of specific projects relating to Hastings and Rother on better use of existing water and drought action.

82. [South East Water 'Water Resources Management Plan' 2020-2080](#) is similar to Southern Water's, and highlights measures for greater water efficiency.
83. The [ESCC Climate Change Strategy \(2009\)](#) outlines the steps the County Council has taken to reduce environmental impact within its own activities.
84. The [Energy Strategy for the South East](#) was produced by three Local Enterprise Partnerships (SELEP, Coast to Capital and Enterprise M3) It provides a vision for energy provision based around five priority themes with 18 'project models' to support delivery. These are summarised below by theme:
 - **Low Carbon Heating:** District Heat Networks rollout ; Off-gas grid home; Hydrogen injection into the Natural Gas grid; and New-build homes on hydrogen grid
 - **Energy Saving and Efficiency:** Off-gas grid homes; Energy Efficiency in homes and SME Support Programme
 - **Renewable Generation:** Offshore wind development; Solar and microgrid on landfill sites; Biomass fuel supply chain development; Solar energy for Network Rail; Car parks - solar potential; and Biofuel evolution
 - **Smart Energy System:** Solar and microgrid on landfill sites; Housing and community microgrids; EV charging & hydrogen-fuelling infrastructure; Setup of ESCO / MUSCO infrastructure; Support developments in CO2 capture
 - **Transport Revolution:** EV charging & hydrogen-fuelling infrastructure; CNG fleet fuelling and Ports - modernisation of energy infrastructures
85. The [Environment Strategy for East Sussex \(2020\)](#) seeks to: 'Protect and enhance our natural and built environment for current and future generations and tackle and adapt to climate change. Five priority environmental themes have been identified aligning with international and national policy, these are: climate change, natural capital, air quality, water and resource efficiency. It highlights a specific action in relation to water consumption, which is to deliver advice and home visits/ business audits to assist households and businesses to reduce water usage.

Local

86. In relation to climate change Rother District Council declared a Climate Emergency on 16 September 2019 and has committed to becoming carbon neutral by 2030. In order to meet this target, the Council is developing an Environment Strategy and action plan which will be going out for public consultation later this year with adoption predicted by Autumn 2020. The Hastings Climate Emergency Strategy and Action Plan (2020) was developed to support the Climate Emergency motion Hastings Borough Council declared during 2019.
87. The Environment Agency considers Rother to be an area of “serious water stress”. It is therefore imperative that new development is planned to minimise the amount of water consumed per person. In response, the recently adopted Rother Development and Sites Allocation (DaSA) Local Plan contains Policy DRM1: Water Efficiency, which requires that all new dwellings are to be “designed to achieve water consumption of no more than 110 litres per person per day” in line with the optional technical standards through Building Regulations.
88. [Rother District Council's Environment Strategy \(February 2020\)](#) sets out the Council's vision for reducing its impact on the environment, including detailed action plans to make Rother District carbon neutral by 2030. It identifies a need for a co-ordinated approach working closely with district leaders and stakeholder partners and identifies a range of priority areas including air quality and a series of actions which relate to sustainable energy production, these include actions to:
- support the TRI-LEP in delivery of sustainable energy solutions for the district of Rother.
 - consider the scope for sustainable energy solutions as part of the Local Plan Review.
 - support communities to develop localised energy solutions.

Baseline and Trends

89. Carbon dioxide emissions by all sectors are currently high in Rother District at 421 kilo tonnes and 249 kilo tonnes in Hastings, although both are showing reduced annual rates from the previous year. However domestic consumption of gas has increased for both authorities over the last recorded year, with domestic consumption of electricity remaining stable. Annual statistics on renewable energy regeneration show an increase over the last reporting years in both local authorities with a baseline of 11.2MW in Rother District and 7.5MW in Hastings Borough. Daily domestic water usage per capita is currently at a level of 150 litres per day in Rother District and 123 litres (metered)/169 litres (unmetered) in Hastings Borough (see Appendix 2 for details). Local supply matters are dealt with in Section 6.
90. The Baseline indicators Summary Table in Appendix 2 provides includes data on carbon dioxide emissions, domestic and commercial consumption of electricity and gas, mode of travel to work, renewable energy generation and daily domestic water use.

Key issues

91. The following key issues emerge from the review of relevant plans and programmes and baseline review:
- Gas consumption rates are increasing year on year and new development has the potential to increase consumption
 - Domestic water consumption per capita is above national targets.
92. The likely evolution without the respective updated Local Plan is:
- There could be an increase in energy and water consumption, arising from the impact of new development.

Sustainability Objective(s)

93. In light of the key issue discussed above it is proposed that the SA should include the following objectives:

- **The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation) and preparedness for its impacts (adaptation).**
- **Minimise water consumption.**

6. CLIMATE, FLOODING AND COASTAL CHANGE

Relevant Plans and Programmes

International

94. Key plan and programmes at the international level include:

- [UN Resolution 2015 Transforming our world: the 2030 Agenda for Sustainable Development \(2015\)](#): 17 Sustainable Development Goals have been identified as part of a universal call to action to end poverty, protect the planet and improve the lives and prospects of everyone. The 17 Goals were adopted by all UN Member States in 2015, as part of the 2030 Agenda for Sustainable Development which set out a 15-year plan to achieve the Goals. Goal 14 to 'Conserve and sustainably use the oceans, seas and marine resources for sustainable development'. It also includes action related to the protection and conservation of coastal areas.
- [European Floods Directive \(2007\)](#): A framework for the assessment and management of flood risk, aiming at the reduction of the adverse consequences for human health, the environment, cultural heritage and economic activity.
- [European Energy Performance of Buildings Directive \(2010\)](#): Aims to promote the energy performance of buildings and building units. Requires the adoption of a standard methodology for calculating energy performance and minimum requirements for energy performance.

National

95. The [National Planning Policy Framework \(2019\)](#) highlights a number of measures/ actions related to climate change, flood risk and coastal change. These are extracted below:

- Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for

physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.

- Inappropriate development in areas at high risk of flooding should be avoided by directing development away from areas of highest risk (whether existing or future).
- Strategic policies should be informed by a strategic flood risk assessment³ and should manage flood risk from all sources.
- Plans should take account of the effects of climate change in the long term, taking into account a range of factors including flooding. Adopt proactive strategies to adaptation and manage risks through adaptation measures including well planned green infrastructure.
- Plans should reduce risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbate the impacts of physical changes to the coast.

96. [The UK Climate Change Risk Assessment](#) is published on a 5-yearly cycle in accordance with the requirements of the Climate Change Act 2008. It required the Government to compile an assessment of the risks for the UK arising from climate change, and then to develop an adaptation programme to address those risks and deliver resilience to climate change on the ground. DEFRA 's (2017): 'UK Climate Change Risk Assessment Report January 2017', contains six priority risk areas requiring additional action in the next five years:

- Flooding and coastal change risks to communities, businesses and infrastructure;
- Risks to health, well-being and productivity from high temperatures;
- Risk of shortages in the public water supply, and for agriculture, energy generation and industry;
- Risks to natural capital, including terrestrial, coastal, marine and freshwater ecosystems, soils and biodiversity;
- Risks to domestic and international food production and trade; and
- New and emerging pests and diseases, and invasive non-native species, affecting people, plants and animals.

³ The Strategic Flood Risk Assessment (SFRA) is a living document and is currently been updated.

97. [The Flood and Water Management Act \(2010\)](#)

The UK Climate Change Risk Assessment is published on a 5-yearly cycle in accordance with the requirements of the Climate Change Act 2008. It required the Government to compile an assessment of the risks for the UK arising from climate change, and then to develop an adaptation programme to address those risks. The 2017 UK Climate Change Risk Assessment, the Adaptation Sub-Committee commissioned an evidence report 15 containing six priority risk areas requiring additional action in the next five years:

- Flooding and coastal change risks to communities, businesses and infrastructure;
- Risks to health, well-being and productivity from high temperatures;
- Risk of shortages in the public water supply, and for agriculture, energy generation and industry;
- Risks to natural capital, including terrestrial, coastal, marine and freshwater ecosystems, soils and biodiversity;
- Risks to domestic and international food production and trade; and
- New and emerging pests and diseases, and invasive non-native species, affecting people, plants and animals

98. [The Flood and Water Management Act \(2010\)](#) sets out measures to ensure that risk from all sources of flooding, not just rivers and seas, are managed more effectively. This includes: incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; roll back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems

Regional and County

99. [The South Foreland to Beachy Head Shoreline Management Plan \(2006\)](#) is a large-scale assessment of the risks associated with coastal erosion and presents a policy framework to address these risks. The Plan states that its

implementation would not likely have a significant effect on the Hastings Cliffs SAC or the Pevensey Levels Ramsar site.

100. The [Environment Agency ' River Basin Management Plan South East River Basin District \(2009\)](#) is a set of documents that set out the 2009 objectives for protecting and improving the water environment under the Water Framework Directive, and the programme of measures to achieve them. The [East Sussex Local Flood Risk Management Strategy](#) is also of importance in relation to managing flood risk.
101. Catchment flood management plans (CFMPs) consider all types of inland flooding, from rivers, ground water, surface water and tidal flooding, but not flooding directly from the sea, (coastal flooding), which is covered in 'shoreline management plans'.
102. The [Environment Agency Catchment Flood Management Plan: Rother and Romney](#) (2009) Page 9 discusses current risk management of flooding in the area, whilst Rother District Council is a key stakeholder in policy sub-areas 1, 3, 5 and 6. Measures mentioned include:
- Sub-area 1:
 - Providing Development Control advice to ensure no increase in run-off from new developments and seek opportunities to reduce current run-off rates where appropriate
 - Developing a System Asset Management Plan (SAMP) to maintain flood risk at the current level
 - Sub-area 3:
 - Undertake System Asset Management Plans (SAMPs) to review maintenance regimes and to maintain current level of investment
 - Working with Natural England to create wetland habitat
 - Supporting the development and recommendations of the Walland Marsh, Dungeness Romney Marsh, Rye Bay and Romney Warren Water Level Management Plans (WLMPs)
 - Undertake depth, duration and hazard mapping on Romney Marsh, including looking at coastal and river interactions. To improve the understanding of flood depths and hazard on the marshes.

- Sub-area 5:
 - Provide development control advice to ensure no increase in run-off from new developments and seek opportunities to reduce current run-off rates where appropriate.
 - Develop a System Asset Management Plan (SAMP). This plan should aim to maintain flood risk at the existing level taking climate change into account; work in partnership with Rother District Council and Southern Water to develop a Surface Water Management Plan (SWMP) for Rye. This will address the important issue of surface water flooding in this unit
 - Support the development and recommendations of the Rye Harbour SSSI Water Level Management Plan (WLMP). Support the development of the WLMP for the new Dungeness, Romney Marsh and Rye Bay Site of Special Scientific Interest (SSSI). Water Level Management Plans are key for managing flood risk and biodiversity needs in this unit.
- Sub-area 6:
 - Support the development and recommendations of the Rye Harbour and Pett Level SSSI Water Level Management Plans (WLMP). Support the development of the WLMP for the new Dungeness, Romney Marsh and Rye Bay Sites of Special Scientific Interest (SSSI). WLMPs are key for managing flood risk and biodiversity needs in this unit.
 - Develop a System Asset Management Plan (SAMP). This plan should aim to increase the frequency of flooding to deliver benefits elsewhere. For example, investigate areas identified in the High Weald integrated catchment management and river restoration study where wetland habitat or washlands can help to reduce flooding. (Link with the regional habitat creation programme, River Rother restoration strategy and Rother - the potential for the integrated management of rural floodplains project).
 - Investigate opportunities to work with landowners to create wetland habitat, The High Weald integrated catchment management and river restoration study should be updated with data review and ground truthing to prioritise sites for further investigation. (Link with the

regional habitat creation programme, River Rother restoration strategy and Rother- the potential for the integrated management of rural floodplains project).

103. The [Environment Agency Catchment Flood Management Plan: Cuckmere and Sussex Havens \(2009\)](#) where policy sub-areas 5, 7 and 8 state measures to influence and work with Rother District Council on:

- Sub-area 5:
 - Ensuring no net increase in run-off from new developments
- Sub-area 7:
 - Work with Rother District Council and the water companies to develop a Surface Water Management Plan (SWMP) for Bexhill and Hastings
 - Work with Rother District, Hastings Borough Council and East Sussex County Council and the Highways Agency to identify local restrictions to flows and ensure adequate channel capacity
 - Work with Rother District and Hastings Borough Council to influence spatial planning, providing advice on methods to reduce run-off and implementation of Sustainable urban Drainage Systems (SuDS) in all new developments.
- Sub-area 8:
 - Work with Rother District Council to encourage methods to reduce run-off and implementation of Sustainable urban Drainage Systems (SuDS) in all new developments

104. The [Environment Agency Catchment Flood Management Plan: Medway \(most Northern section of Rother is within this catchment\)](#) policy 3 applies to immediate sub-areas to the north of Rother and Romney such as Medway, Lower Medway, and Beult. Policy 3 is an area of low to moderate flood risk where we are generally managing existing flood risk effectively.

105. There are 3 Coastal Defence Strategies (2003-2015) that relate to the local authority areas of Rother and Hastings. These are currently going through a review process. The associated amount of dwellings that are a risk from coastal erosion and flooding in each area is approximated, as below:

- Redoubt Gardens to Cooden – 14,000 properties (only a small portion of this coastline is within Rother District);

- Cooden to Cliff End – 4,300 properties;
 - Folkestone to Cliff End – 20,000 properties.
106. The [Environment Strategy for East Sussex \(2020\)](#) strategy seeks to: 'Protect and enhance our natural and built environment for current and future generations and tackle and adapt to climate change. Five priority environmental themes have been identified aligning with international and national policy, these are: climate change, natural capital, air quality, water and resource efficiency. In relation to air climate change actions identified are to:
- Develop a science-based road map for cutting carbon emissions.
 - Develop and support a pipeline of projects that deliver a significant reduction in carbon emissions.
 - Develop and implement an electric vehicle strategy for East Sussex.
107. The Hastings Climate Emergency Strategy and Action Plan (2020) was developed to support the Climate Emergency motion Hastings Borough Council declared during 2019. It sets out a vision to make Hastings carbon neutral by 2030. It covers the borough of Hastings but acknowledges that to meet the target the impact of the strategy must extend to the wider region. The strategy has six priority themes and associated projects which are set out below.
108. The strategy is supplemented by a 2-year action plan which indicates that a longer term action plan for 2022-2030 will be developed in parallel with its implementation. The following are action points in relation to the 2 year plan:
- **Communication, lobbying and partnership working:** Webpage development and communication material Stakeholder engagement via partnership structures Partnership working to develop projects and inform the 8- year action plan, Lobbying locally, regionally and nationally to enable change
 - **Grid decarbonisation:** Work with UKPN to support the transition to a smart grid. Planning Policy – enable strategic energy infrastructure
 - **Reduced energy demand:** Identify funding for retrofit, Review council assets and initiate retrofit programme of works
 - **Renewable energy:** Commence a new programme of rooftop solar installations on council-owned and 3rd party roofs, Develop a business model for carpark rooftop solar Explore ground-mounted solar array

sites

- **Low Carbon sustainable transport:** Contribute to the delivery of 15 public EV charge points in 20/21, Initiate purchase of council own EV fleet, Explore options for EV or ULEV fleet for public transport/taxi fleet
- **Offsetting:** Research and review sequestering CO2 with HBC land management

Local

109. Both Councils are undertaking new Strategic Flood Risk Assessments in support of their respective Local Plans. This will indicate locations that development should be steered away from, and if necessary the process for locating development sequentially and undertaking the exception test. The extent of flood risk zones 2 and 3 are provided in Figures 6a and 6b below, based on the most recent data from Environment Agency.

Figure 6a - Flood Zone 2 and 3 Map for Rother District

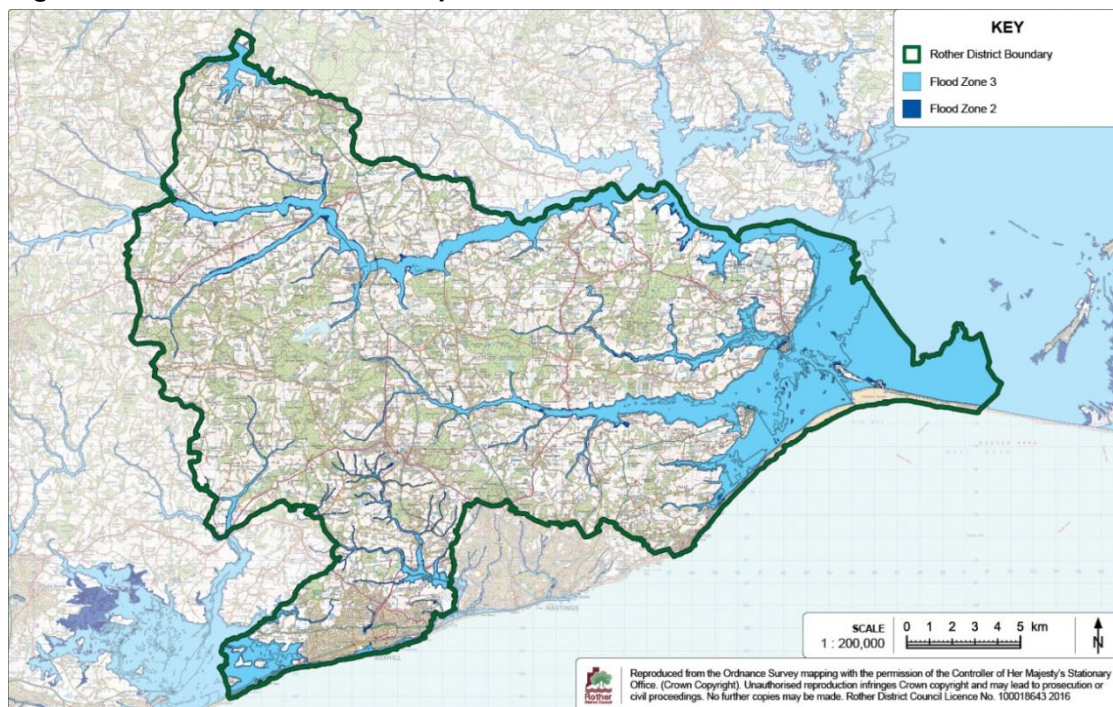
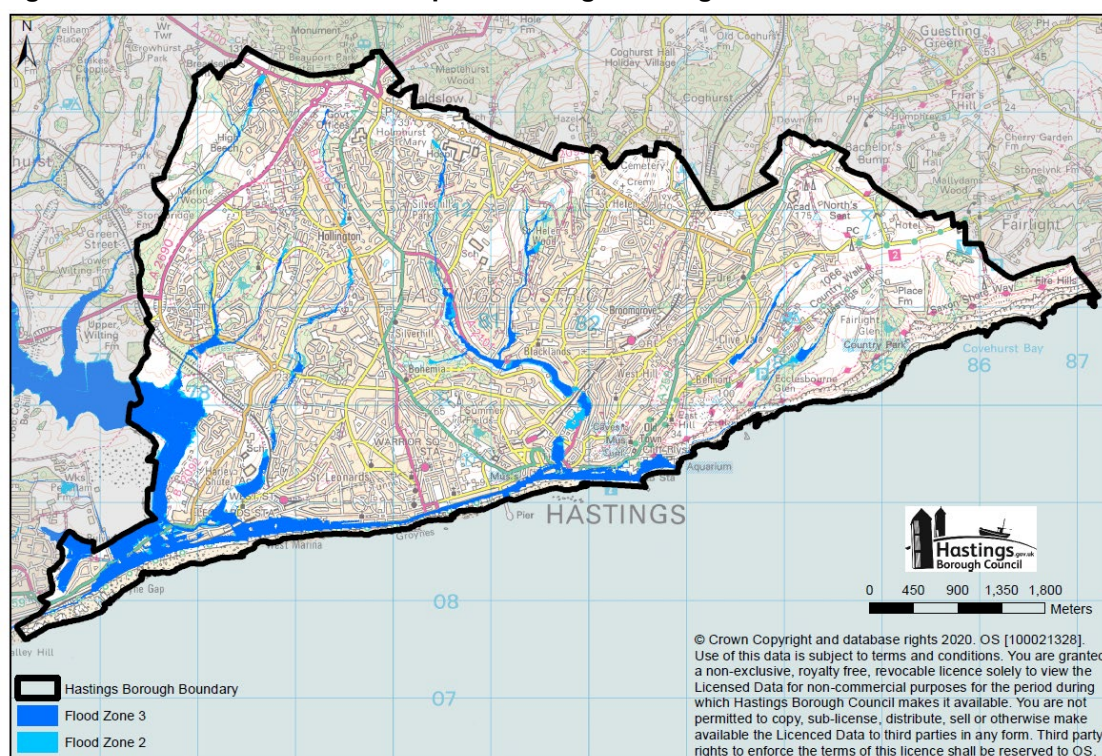


Figure 6b - Flood Zone 2 and 3 Map for Hastings Borough



Baseline and Trends

110. The [RDC Local Monitoring Report 2018-2019](#) indicates that there are 8,301 properties at risk from flooding. This has not increased from the previous year, demonstrating the positive action that the Council is undertaking to ensure development takes place outside of the flood plain. No planning permissions were granted in the 2018-2019 monitoring year that were contrary to Environment Agency advice on flood defence grounds.
111. In Hastings BC no planning permissions were granted in the 2018-2019 monitoring year that were contrary to Environment Agency advice on flood defence grounds.
112. Both Councils seek to ensure there is no change to properties at risk from flooding, and that they continue to align planning decisions with Environment Agency advice.

Key issues

113. The following key issues emerge from the review of relevant plans and programmes and baseline review:

- Water run-off from development and surface water flooding is an increasing local issue;
- Coastal erosion has the potential to impact existing properties and future proposals. The coastal defence strategy is important for this issue moving forward.

114. The likely evolution without the respective Local Plan Updates is:

- Develop in inappropriate locations, vulnerable to flood risk or coastal erosion
- Increased surface water flooding associated with poor design on individual developments, or the cumulative impact of the loss of permeable surfaces across the area.

Sustainability Objective(s)

115. In light of the key issue discussed above it is proposed that the SA should include the following objectives:

- **Manage and reduce the risk of flooding (fluvial, tidal and surface water), now and in the future, and increase resilience to the wider effects of climate change The risk of coastal erosion is managed and reduced, now and in the future**

7. POPULATION, HEALTH AND WELLBEING

Relevant Plans and Programmes

International

Key plan and programmes at the international level include:

- [UN Resolution 2015 Transforming our world: the 2030 Agenda for Sustainable Development \(2015\)](#): 17 Sustainable Development Goals have been identified as part of a universal call to action to end poverty, protect the planet and improve the lives and prospects of everyone. The 17 Goals were adopted by all UN Member States in 2015, as part of the 2030 Agenda for Sustainable Development which set out a 15-year plan to achieve the Goals. Goal 3 incorporates various health issues ranging from road-traffic accidents to reducing the numbers of deaths and illnesses from hazardous chemicals and air, water and soil pollution and contamination.
- [European Environmental Noise Directive \(2002\)](#): Sets out a hierarchy for the avoidance, prevention and reduction in adverse effects associated with environmental noise, including noise generated by road and rail vehicles, infrastructure, aircraft and outdoor, industrial and mobile machinery.
- [United Nations Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters \(1998\)](#): Establishes certain rights of the public with regard to the environment. The Parties to the Convention are required to make provisions for these rights to become effective.

National

117. The [National Planning Policy Framework \(2019\)](#) highlights a number of measures/actions related to health and wellbeing. These are extracted below:

- *Take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community (Para. 92b);*

- *Help deliver access to high quality open spaces and opportunities for sport and physical activity to contribute to the health and well-being of communities (Para. 96);*
- *Provide the social, recreational and cultural facilities and services the community needs, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship, whilst guarding against the unnecessary loss of community facilities and services (Para 92a);*
- *Enable and support healthy lifestyles through provision of green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling (Para 91c);*
- *Ensure that there is a sufficient choice of school places' and taking a 'proactive, positive and collaborative approach' to bringing forward 'development that will widen choice in education (Para. 94);*
- *Retain and develop accessible local services and community facilities in rural areas (Para. 83d);*
- *Ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. Places should contain clear and legible pedestrian routes, and high quality public spaces, which encourage the active and continual use of public areas (Para. 91d);*
- *Support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing (Para. 8b); and*
- *The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (Para. 61).*

118. [The PHE Strategy 2020 to 2025](#) sets out how Public Health England (PHE) will work to protect and improve the public's health and reduce health inequalities over the next 5 years.

119. [Noise exposure data - England](#) published by the Department for Environment, Food and Rural Affairs (DEFRA) reports on collected data in 2011 on proximity of population in Hastings and Bexhill (solely urban areas) to areas of differing noise levels measured in decibels.
- During the day, around 11,900 people are exposed to road traffic of up to 65 decibels, and 5,500 of those are exposed to up to 70 decibels.
 - At night, 6,100 people are exposed up to 60 decibels from road traffic and no one is exposed to levels higher than 60 decibels.

Regional and County

120. [Pride of Place, a Community Strategy for East Sussex \(2009\)](#) set out a long term vision for improving people's quality of life and the main things we must do to achieve that vision, including improving health and wellbeing. [The programme ended in 2011.](#)
121. [The Annual Report of the Director of Public Health in East Sussex 2019/20: Health and Housing Report](#) focuses on health and housing in East Sussex. Housing is an important determinant of health, alongside employment and social connections with family, friends and others. Access to healthcare is responsible only for a relatively small part of what makes us healthy. In order to improve the health and wellbeing of East Sussex residents and to reduce inequalities, the broader determinants of health need to be addressed. The recommendations in the report address collaboration across East Sussex as a whole, promotion of initiatives that will help ensure safe and healthy homes and personalising the support people require to improve their health.
122. The [East Sussex Health and Social Care Plan – July 2020](#) reflects the particular demands facing Adult Social Care and Health (ASCH) locally reflect local demographic changes, financial constraints over the last decade, and the need to integrate more closely with health and develop closer working with the voluntary and community sector.

Local

123. The [East Sussex Health and Social Care Plan \(2019\)](#) sets a vision to create a sustainable health and social care system that promotes health and wellbeing whilst addressing quality and safety issues, in order to prevent ill health and deliver improved patient experience and outcomes for our population. This will

be delivered through a focus on population needs, better prevention, self care, improved detection, early intervention, proactive and joined up responses to people that require care and support across traditional organisational and geographical boundaries.

124. The [NHS Hastings and Rother CCG 'Healthy Hastings and Rother'](#) (2014) programme aims to reduce health inequalities by improving the health and wellbeing of people in Hastings and Rother's most disadvantaged communities. It is led by East Sussex NHS CCG and supported by a range of partners, including East Sussex County Council (ESCC), Hastings Borough Council (HBC), Rother District Council (RDC), East Sussex Healthcare NHS Trust (ESHT) and the voluntary and community sector. The [Healthy Hastings and Rother 2019 summary can be accessed using this link.](#)
125. The Sussex Health and Care Partnership's [Population Check](#) (2019) focuses on the following priorities to allow services to better meet the needs of the population:
 - Looking at new ways to treat and care for more people and using staff more effectively.
 - Helping people manage, and make decisions about, their own health and care better.
 - Helping people make the right lifestyle choices.
 - Reducing unjustified differences in clinical treatment.
 - Providing services closer to home with good communication and coordination.
126. The [Active Rother Partnership Strategy \(2018-2022\)](#) enables partners to work effectively together and combine efforts by:
 - Providing a reference point for all relevant organisations to draw upon when developing strategic and operational approaches to health and wellbeing with a specific focus on physical activity
 - Strengthening coordination, capacity and commitment between organisations, community groups and agencies responsible for the decisions and delivery that will encourage more people to become more physically active more often

- Maximising the impact of current investment, funding and resources available for physical activity.
127. The [Hastings and Rother Leisure Facilities Strategy](#) (2009-2020) identifies optimum locations and levels of provision to help establish sustainable facilities. A more recent [Rother Indoor Sports and Leisure Facilities Strategy \(2015-2025\)](#) assesses how well the current provision of sports and leisure facilities across all providers is meeting current demand and participation. [The Hastings Sport and Physical Activity Strategy \(2016-2020\)](#) sets out a vision for Hastings in terms of sport and physical activity. It reflects the vision of a range of partners and aims to facilitate those partners, and others, to make a difference through sport and physical activity.
128. [Rother and Hastings Playing Pitch Strategy \(2016\)](#) indicates the need for an overall approach to improve access and opportunities for all ages to play sport formally and informally. This aligns with the objectives of 'Active Communities – a strategy for Rother'. Additionally, both Sport England and the Government have targets to increase the number of people who are active and involved in sport. The Council should prevent the loss of existing sports pitches and seek to deliver an increased supply of suitable pitches in line with population growth. The additional need for sport and leisure in the Bexhill area must be considered including indoor and outdoor spaces with support facilities to enable a wider range of the community to be active. Communities should be encouraged to ensure playing pitches are seen as community assets and a resource for all residents.
129. [East Sussex Safer Communities Partnership's Business Plan \(2017-2020\)](#) - The East Sussex Safer Communities Partnership undertakes a strategic assessment of community safety every three years with an annual refresh in order to select work streams and plan activity for the year ahead.
- The Safer Hastings Community Safety Partnership and the Safer Rother Community Safety Partnership are currently trialling a joint strategic partnership, where joint local priorities have been developed that will be the focus of current and future activities. This joint action helps in improving communication between partners, pools resources and makes the impact of interventions, initiatives and projects far more effective and long lasting. Local Hastings & Rother activities will still continue to address local needs. This will result in different results and different

outputs but, have longer term outcomes which will show a marked improvement in the issues addressed across the trialled partnership.

- Priorities outlined in pages 35-38 include:
 - Street and community related anti-social behaviour
 - Violent Crime (including Domestic Abuse)
 - Youth Crime and vulnerable young people
 - Road Safety- inconsiderate driving behaviour continues to be at the root of all traffic collisions. The Hastings & Rother Roads Partnership, part of the community safety agenda, is developing a range of campaigns and simple actions needed to reduce injury and make road use safer.
 - Modern Slavery & Human Trafficking
 - Partnership communications and reassurance messages- Many messages about personal and community safety are lost in modern communication methods.

130. The [Rother District Council Housing and Homelessness Strategy \(2018\)](#) has proposed actions relating to homelessness and rough sleeping, increasing the supply of affordable housing, and improving the quality of housing.

131. The [Hastings Homelessness & Rough Sleeping Strategy 2019-2023](#) is one of three documents which make up the council's new housing strategy, expected to be adopted in spring 2020.

132. The [Rother District Council Strategic Housing Research Project \(SHRP\) – \(2018\)](#) is a survey on a random sample of private sector housing within six designated sub-areas (the study area consists of Battle Urban, Battle Rural, Bexhill, Rye Urban, Rye Rural and Ticehurst Rural)). In parallel a residents survey was carried out to establish housing need and aspiration across the district.

133. There are 5 Made Neighbourhood Plans in Rother District which provide local planning policies for their communities: [Rye](#), [Sedlescombe](#), [Salehurst and Robertsbridge](#), [Crowhurst](#) , and [Ticehurst](#)

Baseline and Trends

134. There are a number of different interlinked factors which relate to human health and well-being from the quality and safety of the local environment through to specific health indicators and other factors like access to opportunities for sport / recreation.
135. Life expectancy at birth in Rother District is 82.2yrs, compared to 79.4yrs in Hastings. The long term picture has shown a gradual but consistent increase in life expectancy, with the Hastings figure plateauing and slightly decreasing in the last year. Standard mortality rates are below the norm in Rother and just above the norm in Hastings. This is attributed to a larger elderly population in Rother which is generally living longer. There have been small increases in the number of people with long term illnesses in both local authorities with the current baseline being at around 21-22,000 people. Data in relation to childhood obesity shows that the percentage classified as overweight or obese has increased for the age group 4-5yrs, but has stayed stable or improved for the 10-11yrs age group for both local authorities.
136. Both Councils' house price to earnings ratios have worsened in recent years with Rother current being at 10.91 compared to Hastings at 8.53 (see Appendix 2). This will impact households from getting onto the property market. The number of households on the housing register is 1,105 for Rother and 1,340 for Hastings (2017 data). The total number of homeless households stands at 122 for Rother and 260 for Hastings (see Appendix 2). Both the housing register and homeless figures for both local authorities have worsened since the previous reporting year, resulting in a key target for improvement over the Local Plan period.
137. The accessibility of households across Rother District and Hastings Borough to key services is an important indicator of sustainability. Most indicators look at households within 30 minutes of public transport/walking distance from key services and facilities. The current baseline figure for both Councils provide a very fractional change from data recorded in the last few years. It will be important to monitor these indicators to ensure the future sustainable location of development.

138. Crime statistics have got worse in both Local Authorities in relation to all offences and violence against the person. There has been a particularly sharp rises in Rother District in relation to all offences (6.4% increase).
139. The Baseline indicators Summary Table in Appendix 2 provides a basis to assess the impact of policies and planning decisions through the respective Local Plan updates. They include data on accessibility to services and facilities. Crime and fear of crime, homelessness, affordability, participation in sporting activities and life expectancy.

Key issues

140. The following key issues emerge from the review of relevant plans and programmes and baseline review:
- Ageing population in Rother and falling life expectancy in Hastings Borough;
 - Childhood obesity in young children;
 - Widening gap between wages and property values, worsening access to the property markets and increasing homelessness figures across both areas;
 - Worsening crime statistics in both authorities.

Sustainability Objective(s)

141. The likely evolution without the Local Plan Update is:
- Not meeting housing needs: quantum and type, including affordability;
 - Worsening health and inequalities;
 - Potential for a lack of adequate services and facilities for elderly and young with particular health needs;
 - Inappropriately located settlements, sustainability issues if facilities and services are not co-located with, or located near to, new development.
142. In light of the key issue discussed above it is proposed that the SA should include the following objectives:

- **The health and well-being of the population is improved and inequalities in health are reduced**
- **More opportunities are provided for everyone to live in a suitable home to meet their needs**
- **All sectors of the community have improved accessibility to services, facilities, jobs, and social, cultural and recreational opportunities**
- **Safe and secure environments are created and there is a reduction in crime and the fear of crime**

8. HERITAGE

Relevant Plans and Programmes

International

143. [European Convention for the Protection of the Architectural Heritage of Europe \(1985\)](#): requires that the signatories maintain an inventory of it and take statutory measures to ensure protection of architectural heritage. Conservation policies are also required to be integrated into planning systems and other spheres of government influence as per the text of the convention.
144. [Valletta Treaty \(1992\) formerly the European Convention on the Protection of the Archaeological Heritage \(Revisited\)](#): aims to protect the European archaeological heritage “as a source of European collective memory and as an instrument for historical and scientific study”.

National

145. [The National Planning Policy Framework \(2019\)](#) highlights a number of measures/ actions related to heritage. These are extracted below:
 - Strategic policies should set out an overall strategy making provision for ‘conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure.
 - Planning policies and decisions should ensure that developments ‘are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation of change (such as increased densities)’.
 - Heritage assets should be recognised as an ‘irreplaceable resource’ that should be conserved in a ‘manner appropriate to their significance’, taking account of ‘the wider social, cultural, economic and environmental benefits’ of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness.
 - Plans should set out a ‘positive strategy’ for the ‘conservation and enjoyment of the historic environment’, including those heritage assets that are most at risk.

- When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
146. [The Government's Statement on the Historic Environment for England 2010](#) highlights the importance of historic environment and the need to recognise its importance and manage its value in light of the contribution that it can make to social, economic and cultural life. Includes reference to promoting the role of the historic environment within the Government's response to climate change and the wider sustainable development agenda.
147. [The Heritage Statement \(2017\)](#) sets out how the Government will support the heritage sector to protect and care for the historic environment, in order to maximise its economic and social impact and to ensure that everyone can enjoy and benefit from it.
148. [Historic England's 'Sustainability Appraisal and Strategic Environmental Assessment' Advice Note \(2016\)](#) sets out its expectations for the consideration and appraisal of effects on the historic environment as part of the Sustainability Appraisal/Strategic Environmental Assessment process.
149. [The Scheduled Monuments and Archaeological Areas Act 1979](#) provides the legal framework for the designation of Scheduled Monuments, details of which can be found at:
<https://historicengland.org.uk/advice/hpg/has/scheduledmonuments/>

Regional and County

150. The South East Historic Environment forum decided not to publish a regional report. However, South East local area data is available in the [Local Authority Profile section](#) and regional data is available on the [Indicators page](#). The last regional report was the [Heritage Count Indicators for the South East \(2013\)](#). The ESCC Historic Environment Records (HERs) are used as an important source of baseline data.

Local

151. The [Hastings & Rother Family History Society](#), explains that Hastings gave its name to the famous 1066 battle so decisive in changing rule from Saxon to Norman French. The area around the town is referred to as “Rother” which is taken from the River Rother which flows through it and into the English Channel at Rye. The ancient town of Rye was, for centuries, a vital port for ship-building, imports and exports as well as for fishing.
152. Rother District has a rich architectural legacy, including the historic market towns of Battle and Rye, the Victorian and Edwardian seaside town of Bexhill-on-Sea, a host of picturesque villages, listed buildings including many isolated farmsteads dispersed throughout the High Weald, together with modernist buildings from the 1930s and 1960s, and some strong examples of contemporary architecture. Much of the settlement of Winchelsea is a Scheduled Monument and is a very rich source of medieval archaeological/architectural data (both above and below ground). There is an abundance of built and natural heritage in Rother with [10 Conservation Areas](#) and 2,142 listed buildings.
153. Rother Council has adopted six conservation area appraisals, from the 10 conservation areas identifying areas of particular architectural and historic interest:
- [Rye Conservation Area Appraisal \(2006\)](#)
 - [Battle Conservation Area Appraisal \(2006\)](#)
 - [Bexhill Town Centre Conservation Area Appraisal \(2004\)](#)
 - [Sedlescombe Conservation Area Appraisal \(2004\)](#)
 - [Robertsbridge Conservation Area Appraisal \(2009\)](#)
 - [Winchelsea Conservation Area Appraisal \(2008\)](#)
154. Hastings has a very rich and varied historic environment. Historic interest exists in the borough’s buildings, landscape and below ground level. In all, there are 6 scheduled monuments, over 900 listed buildings, 18 conservation areas, 2 registered historic parks, 300 archaeological sites/monuments/finds locations, and 27 archaeological notification areas within the town. The many historic buildings and spaces combine with the town’s stunning topography to deliver a uniquely attractive and high quality historic townscape.

155. Hastings Borough Council has consulted on a [draft Appraisal and Management Plan for Hastings Central Conservation Area](#) in 2017. A [draft Appraisal and Management Plan for St Leonards](#) was consulted on in 2018. Both documents will be finalised in the coming months.

Baseline and Trends

156. The baseline data for the historic environment is based on built heritage and lists designations to protect its loss. The heritage at risk registers form an important indicator to monitor change in the historic environment. Rother District Council current has 10 buildings on the register that are at risk, which is 2 less than the previous year, indicating an improvement in performance. Hastings Borough Council currently has 9 buildings at risk on the register.
157. Both Councils will use the indicators provided in Appendix 2 to monitor the impact on the historic environment to ensure no degradation and to meet the SA objective indicated.

Key Issues

158. The following key issues emerge from the review of relevant plans and programmes and baseline review:
- No specific historic environment conservation issues at the strategic level (rather than in relation to specific buildings) have been identified, but without continued management there is a risk of deterioration;
 - There may also be opportunities to make heritage more accessible.
159. The likely evolution without the Local Plan Update is:
- Development has the potential to impact on built heritage, although there are opportunities to enhance heritage through sensitive design.

Sustainability Objective(s)

160. In light of the key issue discussed above it is proposed that the SA should include the following objective:
- **Historic environment/ townscape is protected, enhanced and made more accessible.**

9. LAND AND WATER QUALITY

Relevant Plans and Programmes

International

161. Key plan and programmes at the international level are summarised below:

- [UN Resolution 2015 Transforming our world: the 2030 Agenda for Sustainable Development \(2015\)](#): 17 Sustainable Development Goals have been identified as part of a universal call to action to end poverty, protect the planet and improve the lives and prospects of everyone. The 17 Goals were adopted by all UN Member States in 2015, as part of the 2030 Agenda for Sustainable Development which set out a 15-year plan to achieve the Goals. Goal 3 relates to health and includes a resolution to substantially reduce the number of deaths and illnesses from hazardous chemicals and air, water and soil pollution and contamination by 2020.
- [European Urban Waste Water Directive \(1991\)](#): Protects the environment from the adverse effects of urban waste water collection, treatment and discharge, and discharge from certain industrial sectors.
- [European Air Quality Framework Directive \(1996\) and Air Quality Directive \(2008\)](#): Put in place measures for the avoidance, prevention, and reduction in harmful effects to human health and the environment associated with ambient air pollution and establish legally binding limits for the most common and harmful sources of air pollution.
- [European Drinking Water Directive \(1998\)](#): Protects human health from the adverse effects of any contamination of water intended for human consumption by ensuring that it is wholesome and clean.
- [European Landfill Directive \(1999\)](#): Prevents and reduces the negative effects on the environment from the landfilling of waste by introducing stringent technical requirements for waste and landfills.
- [European Water Framework Directive \(2000\)](#): Protects inland surface waters, transitional waters, coastal waters and groundwater.
- [European Waste Framework Directive \(2008\)](#): Sets out the waste hierarchy requiring the reduction of waste production and its harmfulness, the recovery of waste by means of recycling, re-use or reclamation and

final disposal that does not harm the environment, including human health.

- [European Industrial Emission Directive \(2010\)](#): Lays down rules on integrated prevention and control of pollution arising from industrial activities. It also lays down rules designed to prevent or, where that is not practicable, to reduce emissions into air, water and land and to prevent the generation of waste, in order to achieve a high level of protection of the environment taken as a whole.

National

162. [The National Planning Policy Framework \(2019\)](#) highlights a number of measures/ actions related to land and water quality. These are extracted below:

- protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils;
- recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.
- Prevent new or existing development from being ‘adversely affected’ by the presence of ‘unacceptable levels’ of soil pollution or land instability and be willing to remediate and mitigate ‘despoiled, degraded, derelict, contaminated and unstable land, where appropriate’.
- Planning policies and decisions should ‘give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs’, and ‘promote and support the development of under-utilised land and buildings.’
- Prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution.
- Ensure that, wherever possible, development helps to improve local environmental conditions including water quality, taking into account relevant information such as river basin management plans.

163. The **Water Framework Directive (2000)** requires a management plan to be prepared for water catchment areas to inform planning and help meet objectives and obligations in areas such as water efficiency and sustainable drainage. River Basin Management Plans (RBMPs) set out a framework for how all river basin stakeholders, including water companies and local communities, can help improve the quality of the water environment. The Environment Agency has produced a River Basin Management Plan for the south east – details are set out below.
164. The **Government's 25 Year Environment Plan** was published in 2018 and presents the '*goals for improving the environment within a generation, and leaving it in a better state than we found it*'. It includes actions related to:
- Using and managing land sustainably;
 - Embedding a 'net environmental gain' principle for development, including natural capital benefits to improve water quality;
 - Protecting best agricultural land;
 - Improve soil health, and restore and protect peatlands;
 - Respect nature by using our water more sustainably; and
 - Increasing resource efficiency and reducing pollution and waste.
165. [Safeguarding our Soils: A strategy for England \(2011\)](#) sets out a vision for soil use in England which includes better protection for agricultural soils, protecting stores of soil carbon, improving the resilience of soils to climate change and preventing soil pollution. The essential message in relation to development is that pressure on soils is likely to increase in line with development pressure and the planning system should seek to mitigate this.

Regional and County

166. [South East River Basin Management \(2016\)](#) provides a framework for protecting and enhancing the benefits provided by the water environment. To achieve this, and because water and land resources are closely linked, it also informs decisions on land-use planning. It contains:
- **Baseline classification of the quality of water bodies** with the intention of preventing water bodies deteriorating.

- **Statutory objectives for protected areas** highlighting the areas of land and bodies of water that have specific uses that need special protection.
- **Statutory objectives for water bodies which are legally binding objectives for each quality element in every water body**, including an objective for the water body as a whole with the default objective of 'good' status unless natural conditions, technical feasibility or disproportionate cost make improvement impractical by 2021 or by 2027 where it would be more appropriate, have less impact on existing activities or where the environment will need more time to respond to the planned measures.
- **Summary programme of measures to achieve statutory objectives**

167. The document highlights that Hastings bathing water is *projected* to be classified at poor status. The main source of contamination of the bathing water is believed to come from the Alexandra Park stream and its catchment, which discharges to the sea a few hundred metres from the bathing water. Southern Water is working as part of a multi-agency project with the Environment Agency and Hastings Borough Council to improving diffuse pollution that affects the Alexandra Park Stream and the bathing water. It highlights project actions in place to ensure that the bathing water achieve at least 'sufficient' standard from 2015 onwards.
168. The document also highlights that priority issues for the Catchment Partnership for Cuckmere and Pevensey Levels catchment are diffuse pollution, physical obstructions to fish passage and non-native invasive species. The priority issues highlighted for the Catchment Partnership for Catchment Rother and Romney are pollution from waste water, diffuse pollution from rural areas and changes to natural flows and water levels.
169. The [Southern Water 'Water Resource Management Plan 2020-2070](#) sets out how the company intends to supply healthy, reliable drinking water to more than one million homes and businesses for the next 50 years. It is published every five years to reflect changes in customer views, the need to protect the environment and the latest information on climate change and housing growth figures. In the non-technical summary (p. 13), there are specific actions relating to Hastings and Rother on better use of existing water and drought action. [South East Water 'Water Resources Management Plan' 2020-2080](#) is similar to Southern Water's, and highlights measures for greater water efficiency.

170. [The East Sussex Joint Waste Management Strategy \(2014-2025\)](#) covers local authority collected waste as well as waste from commercial and industrial premises and from construction, demolition and excavation works. Non- local authority collected waste makes up approximately 78% of waste created in the area. The plan's approach is to reduce the amount of waste created and to make sure that there is enough capacity in the future to deal with increases in recycling and recovery of waste. The Strategy highlights that it is expected that will not be a need for any more landfill sites in the county (page 5 of the Strategy refers).
171. The [East Sussex Waste and Minerals Plan \(2013\)](#) sets out the strategic policy decisions for waste and minerals in the Plan Area. This Plan forms part of the 'Development Plan' covering East Sussex, part of the South Downs and Brighton & Hove. The [East Sussex, South Downs and Brighton & Hove Waste and Minerals Sites Plan was adopted 2017](#). It highlights industrial sites in which waste related development will be supported highlighting the Queensway industrial areas and including:
- **SP-S/A Burgess Road, Hastings** is an allocated industrial site within High Weald AONB and which may need to be developed in conjunction with land in adjoining Rother District (p76). However, a planning application for industrial units (B1/B2/B8) has been granted for the combined Burgess Road Site and is currently a commitment for development on this site (planning conditions for this development are currently being discharged).
 - **SP-S/B Ivyhouse Lane Extension, Hastings** is a greenfield site within High Weald AONB, allocated in both Hastings and Rother Local Plans for industrial development, but is identified for industrial type development subject to resolution of access and landscape matters (p79).
 - **Land north of Sidley, Rother** is an area allocated for business development by Rother District Council dependent upon completion of BHLR and construction of Bexhill Gateway link (p82). However Rother District expressed concern about this site as it was an allocated strategic high quality business area. Outline permission has now been approved at Bexhill Enterprise Park North for up to 33,500sq.m of business floorspace on all of this site allocation.

172. Safeguarded Waste Sites (highlighted in Appendix B) include the following sites:
- **Rother:** Brett Concrete Works (Unit 1), Brett Drive, Bexhill; Church Fields, Rye Harbour Road, Rye; Hole Farm, Westfield; Mountfield HWRC; and Pebsham HWRC & WTS
 - **Hastings:** Whitworth Road, Hastings Woodland House' and Ponswood Ind. Estate, Hastings
173. The plan also identifies the following 'Mineral Safeguarding Areas' in Rother:
- **Gypsum:** Brightling Mine/Robertsbridge Works, Mountfield;
 - **Sand and Gravel:** Scotney Court Farm, Jury's Gap Road, Camber, near Lydd Scotney Court Extension and Wall Farm
 - **Clay:** Ashdown Brickworks, Bexhill, Hastings Brickworks, Guestling, Aldershaw Farm, near Hastings.
174. Safeguarded facilities for concrete batching include: Hanson Concrete, Sedlescombe Road North, in Hastings and Brett Concrete Works, Brett Drive, Rother.
175. Safeguarded Wharves include: Port of Rye safeguarded wharves and Robertsbridge, British Gypsum railhead safeguarding area.
176. The [East Sussex Waste and Minerals Plan \(2013\)](#) is currently being reviewed in partnership with Kent County Council and the South Downs National Park authority.
177. The [Kent Minerals and Waste Local Plan 2013-2020](#) borders Rother district. Both Councils have examined the plan and presently there are no proposed impacts or issues, but Rother District will continue to engage with Kent County Council regarding such matters moving forward, primarily in relation to the implementation of its SARMS mitigation for the Dungeness complex of Natura 2000 site.

178. The [Environment Strategy for East Sussex \(2020\)](#) seeks to: ‘Protect and enhance our natural and built environment for current and future generations and tackle and adapt to climate change. Five priority environmental themes have been identified aligning with international and national policy, these are: climate change, natural capital, air quality, water and resource efficiency. It identifies natural capital as “the stock of renewable and non-renewable resources (e.g. plants, animals, air, water, soil) that yield a flow of benefits to people, including food, fuel, clean water, climate regulation, pollination of crops by insects and flood defences” (page 8). An action is identified to develop a Natural Capital Investment Plan.

Local

179. [Rother District Council's Draft Environment Strategy \(February 2020\)](#) sets out the Council's vision for reducing its impact on the environment, including detailed action plans to make Rother District carbon neutral by 2030. It identifies a need for a co-ordinated approach working closely with district leaders and stakeholder partners and identifies a range of priority areas including air quality and a series of actions which relate to deal with waste more sustainably these include actions to:
- focus on ‘prevent’ and ‘re-use’ through delivery of ‘top tips’ for residents through ‘MyAlerts’.
 - promote waste reduction in Council offices, including implementing a plan to
 - reduce/eliminate single-use plastics.
 - share expertise with other councils, public bodies and local businesses.
180. [Rother District Council's Green Infrastructure Background Paper](#) (2011 and [Green Infrastructure Background Paper Addendum \(2016\)](#)):
- Identifies the approach to green infrastructure in Rother District.
 - Identifies key green spaces that contribute to green infrastructure in the district. This exercise will draw on relevant existing evidence sources.
 - Identifies potential opportunities for green infrastructure in the district and also identifies any gaps in the data.
 - Provides recommendations for a green infrastructure policy and highlights opportunities for future provision.

Baseline and Trends

181. The percentage of household waste that is being recycled has slightly increased in Rother District, but slightly decreased in Hastings Borough in recent years, with baseline figures of 28.7% and 23.6 for Rother and Hastings respectively for the 2017/2018 year. Total household waste per capita is at 379kg for Rother and 326kg for Hastings (for the year 2017/2018), which has decreased in recent years. The bathing water classification for beaches (2019) in Rother ranges from sufficient in Bexhill to excellent in Camber and Winchelsea. Similarly in Hastings the classification ranges from sufficient in Pelham Beach to excellent in St Leonards.
182. There are currently no entries into the public register of Contaminated Land Sites in either local authority area.
183. Both Councils will use the indicators provided in Appendix 2 to monitor the impact on land and water quality to ensure no degradation and to meet the SA objective indicated.

Key issues

184. The following key issues emerge from the review of relevant plans and programmes and baseline review:
- Increase in general household waste, with links to decrease in domestic recycling;
 - Changes in bathing water quality across both local authorities.
 - Emerging local policies should address brownfield sites, groundwater protection and key infrastructure development relating to surface water and foul water drainage
 - Changes in the ecological status of relevant waterbodies as a potential result of development, to be measured against the requirements of the water framework directive.
185. The likely evolution without the Local Plan update is:
- Significant increased waste generation associated with new development.

Sustainability Objective(s)

186. In light of the key issue discussed above it is proposed that the SA should include the following objectives:

- **The risk of pollution to land and soils is reduced and quality is improved**
- **Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced**
- **The risk of pollution to water is reduced and water quality is improved**

10. NATURAL LANDSCAPE

Relevant Plans and Programmes

International

187. [European Landscape Convention \(2002\)](#): Promotes landscape protection, management and planning. The Convention is aimed at the protection, management and planning of all landscapes and raising awareness of the value of a living landscape.

National

188. The [National Planning Policy Framework \(2019\)](#) expects local plans to enhance the natural landscape through highlighting a number of measures/ actions. These are extracted below:
- Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty [...]. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited.
 - Strategic policies should set out an overall strategy making provision for conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure.
 - Planning policies and decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation of change (such as increased densities).
 - Planning policies and decisions should contribute to and enhance the natural and local environment by:
 - protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils
 - recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services –

including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; and

- remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

189. [A Green Future: Our 25 Year Plan to Improve the Environment \(2018\)](#): sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused including: ‘recovering nature and enhancing the beauty of landscapes’. Key actions include working with authorities with designated “Area of Outstanding Natural Beauty” to deliver environmental enhancements and identifying opportunities for environmental enhancement of all England’s Natural Character Areas, and monitoring indicators of landscape character and quality.
190. National Character Area (NCA) Profiles are published by Natural England and divide England in 159 distinct natural areas based on their landscape, biodiversity, geodiversity, historic, cultural and economic characteristics. NCAs follow natural features in the landscape and are not aligned with administrative boundaries. NCA profiles describe the features which shape each of these landscapes, providing a broad context to its character.
191. Rother and Hastings are part of the [High Weald National Character Area \(2013\)](#). The High Weald National Character Area (NCA) encompasses the ridged and faulted sandstone core of the Kent and Sussex Weald. It is an area of ancient countryside and one of the best surviving medieval landscapes in northern Europe. The High Weald Area of Outstanding Natural Beauty (AONB) covers 78 per cent of the NCA. The High Weald consists of a mixture of fields, small woodlands and farmsteads connected by historic routeways, tracks and paths. Wildflower meadows are now rare but prominent medieval patterns of small pasture fields enclosed by thick hedgerows and shaws (narrow woodlands) remain fundamental to the character of the landscape.

Regional and County

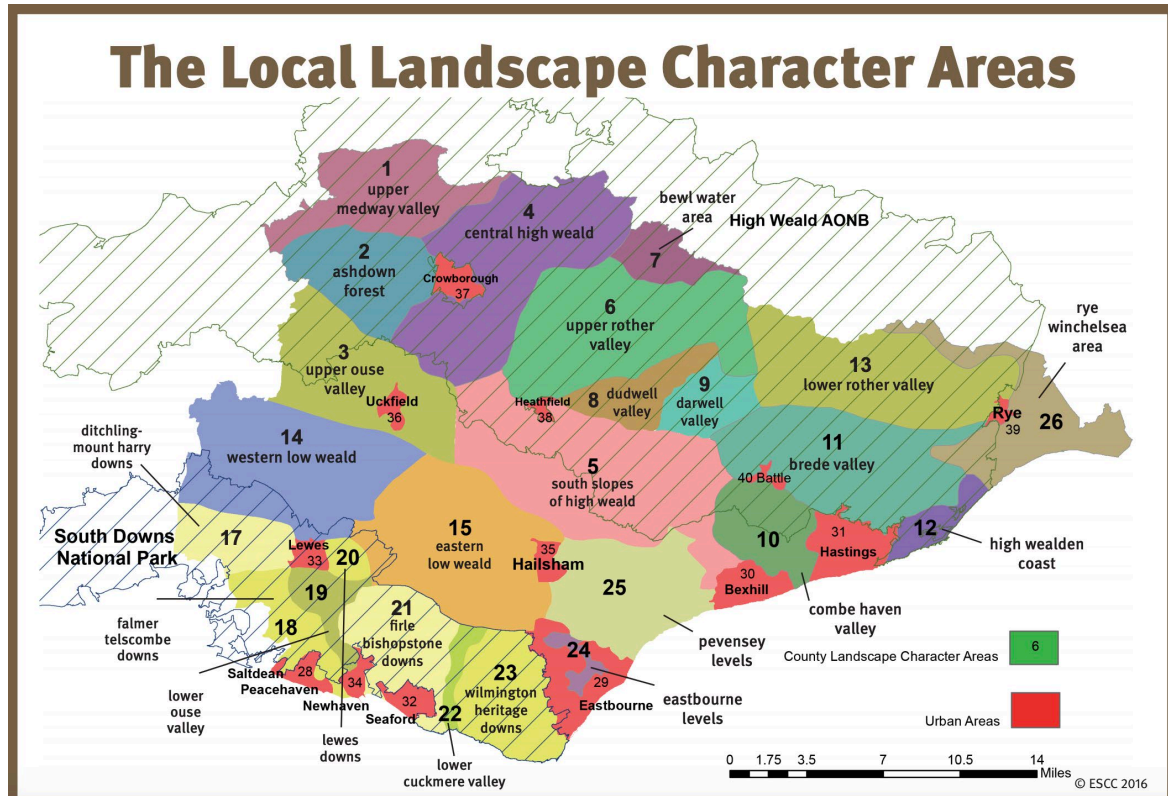
192. [High Weald AONB Management Plan 2019-2024 \(adopted 2019\)](#) AONB Management Plans are statutory documents. The Countryside and Rights of Way Act 2000 requires local authorities with land in an AONB to prepare and

publish an up-to-date plan which ‘formulates their policy for the management of the area and for the carrying out of their functions in relation to it’. Pages 28-61 outline objectives for the purpose of conserving and enhancing natural beauty, and account for the needs of agriculture, forestry and other rural industries, and of the economic and social needs of local communities. It outlines that particular regard should be paid to promoting sustainable forms of social and economic development.

193. [East Sussex Landscape Character Assessment \(2016\)](#) - Landscape Character Assessment is a way of describing and recording what makes a place distinctive or different, what is special about it. This is concerned primarily with landscape character, rather than with quality or value. These factors are nevertheless relevant when a landscape character assessment is used to inform decisions. It is vital that we understand the character of our landscape in order to manage change. Landscape character is an aid to decision making and not a process designed to resist change (see figure 10a below). There are specific assessments for each area which also include considerations for landscape and conservation, for example in [Rye](#), the assessment calls for:

- Consideration of traffic management measures and improvements to parking areas within the town, but with street details and signs designed specifically for Rye and reflecting its character.
- Developing neighbourhood character and awareness in the newer parts of the town, with paving and street furniture reflecting the town’s special character, but also distinctiveness at a more local scale.
- tree planting on open edges and in housing estates, with appropriate distinctive species mix to enhance local character.
- Ensuring that traditional materials are used in street repairs.
- An environmental enhancement strategy for Rye Harbour industrial estate.

Figure 10 - Local Landscape Character Areas



Local

194. Rother Landscape Character Assessments (2018):

- [Northeys/Bexhill](#): The focus of the assessment is to seek specialist advice of the landscape character and quality, and capacity to redevelop Northeys (United Arab Emirates – Former Technical Training Centre), Wartling Drive
- [Fairlight Cove](#): The assessment set out in this report identifies the indicative capacity of the site area to accommodate housing development to support the DaSA Local Plan allocation.
- [Bexhill and Hastings Fringes \(2008\)](#): The output from this study is only to assist in the selection of development sites from the search areas provided. It provides some pointers to the nature and spatial planning of the development opportunities but it does not constitute a Development Brief
- [Market Towns and Villages \(2009\)](#): The aims and objectives of the study are to define the relative capacity of the landscape around existing settlements to accommodate housing and business development, where

this would be compatible with a residential environment. For example in Rye, “The opportunity for any large scale development in and around Rye is very limited. The numbers suggested in the emerging core strategy of 450 dwellings would appear to be realistic especially if this takes in to account the existing allocations and brown field sites.”(s5.2.3).

195. [Rother Ancient woodland Inventory \(2010\)](#) - The Inventory assists Rother District Council’s planners in making decisions about development within the district, thus ensuring that the effects of any development proposals on ancient woodlands can be properly assessed and considered. The revised inventory will also enable a better assessment of the extent and quality of Rother district’s ancient woodland resource to be made, and will help identify threats to the resource, areas for improving habitat connectivity, and opportunities for the strategic management of key woodlands.

Baseline and Trends

196. The designated Area of Outstanding Natural Beauty (AONB) covers 42,810ha of Rother District which is 83.1% of the borough and 543ha of Hastings Borough which is 18%. There have been no revisions to the designated area in recent years. Both Councils will monitor the extent of the AONB area and ensure that negative impacts within it are minimised.

Key issues

197. The following key issues emerge from the review of relevant plans and programmes and baseline review:
- A significant proportion of Rother District is located within the High Weald AONB, which has implications for the location of new development
198. The likely evolution without the Local Plan Update is:
- Inappropriate design of new development, sensitive to its AONB or other landscape character setting

Sustainability Objective(s)

199. In light of the key issue discussed above it is proposed that the SA should include the following objectives:

- **Ensure that open spaces gardens and countryside are protected, enhanced and made more accessible.**

11. SKILLS, EMPLOYMENT AND ECONOMIC DEVELOPMENT

Relevant Plans and Programmes

International

200. Key plan and programmes at the international level include:

- [UN Resolution 2015 Transforming our world: the 2030 Agenda for Sustainable Development \(2015\)](#): 17 Sustainable Development Goals have been identified as part of a universal call to action to end poverty, protect the planet and improve the lives and prospects of everyone. The 17 Goals were adopted by all UN Member States in 2015, as part of the 2030 Agenda for Sustainable Development which set out a 15-year plan to achieve the Goals. Goal 8 relates to promoting sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.

National

201. [The National Planning Policy Framework \(2019\)](#) outlines that Planning policies should help build a strong, responsive and competitive economy by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.

202. It sets out that local plans should:

- Encourage sustainable economic growth within their clear economic vision and strategy.
- Set criteria and identify sites for local investment to match the community needs.
- Address investment barriers such as inadequate infrastructure, services/housing or poor environment.
- Incorporate flexibility to account for unanticipated circumstances, allow new working practices and enable rapid responses to economic changes.

203. [The 2017 White Paper UK Industrial Strategy](#) sets out how the UK Government will help businesses create better, higher-paying jobs in every part of the United Kingdom with investment in the skills, industries and infrastructure of the future. It includes allocations within the National Productivity Investment Fund of £11.5bn for housing and £4.9bn for transport until 2022/23 (p130). 'Place' is a consideration within the strategy, with measures such as:
- agree Local Industrial Strategies that build on local strengths and deliver on economic opportunities;
 - create a new Transforming Cities fund that will provide £1.7bn for intra-city transport. This will fund projects that drive productivity by improving connections within city regions.
204. The [Local Growth White Paper \(2010\)](#) highlights the importance of economic policy that focusses on the delivery of strong, sustainable and balanced growth of income and employment over the long-term, growth which is broad-based industrially and geographically to provide equality of access and opportunity and build businesses that are competitive internationally.

Regional and County

205. The [South East Local Enterprise Partnership: Strategic Economic Plan \(2014\)](#) states that by 2021, the aim is to:
- Generate 200,000 private sector jobs, an average of 20,000 a year or an increase of 11.4% since 2011;
 - Complete 100,000 new homes, increasing the annual rate of completions by over 50% compared to recent years; and,
 - Lever investment totalling £10 billion, to accelerate growth, jobs and homebuilding.
206. It highlights that the government is proposing to retain Assisted Area status for Dover and Thanet and to extend this benefit to Medway and Swale alongside Hastings and Rother.

207. It sets out that there are investment opportunities on, or close to, the A21, for commercial, leisure and housing uses. In Hastings, these include commercial developments at North Queensway, and the Priority Quarter Business District Phase 4, Rye Harbour in Rother, already has a strong manufacturing base and there is opportunity for strategic housing and commercial development in North East Bexhill. To enable new growth, the LEP is seeking investment in the Queensway Gateway Road, and a number of improvements to junctions and capacity improvements in Hastings and Bexhill, including the North Bexhill Access Road. In this corridor there is the opportunity to directly create 5,278 jobs and 765 new homes by 2021 and facilitate 9,700 jobs and 11,300 homes through proposed transport schemes.
208. Sites in Rother include North East Bexhill and Rutherfords in Battle. The total floorspace available is approximately 54,200 sq m, and these constitute Local Plan allocations. This section of the corridor would complement investment that has already successfully stimulated growth, in particular the Enviro 21 Business Park.
209. It highlights that in Hastings there are significant development sites at North Queensway, Churchfields and Ivyhouse Lane. Additional potential floorspace on the remaining proposed industrial sites totals over 45,200 sq. metres. Another part of the growth corridor extends along the coast towards Hastings Town Centre where there are major office development proposals, which could deliver 21,700 sqm of additional office space in the Priory Quarter. It also highlights that there allocated employment sites in the adopted Hastings Local Plan Development Management Plan (2014) which can facilitate significant business growth in Hastings.
210. It goes on to set out that many of the Town Centre development sites require land assembly through agreement and possible use of compulsory purchase powers with a target of over 21,700 sqm of additional floorspace. The next phase for development in the Town Centre is Phase 4 of Priory Quarter and this includes 3,608 sqm of office space and 266sqm retail space. Adjacent to the Town Centre are the additional development opportunities at White Rock/Falaise Road leisure and hotel uses. There is also significant potential in bringing back into use the former Hastings Observer Building at Cambridge Road as mixed-use development.

211. The [SELEP Local Industrial Strategy](#) is based on evidence and aligned to the national Industrial Strategy. Local Industrial Strategies must set out clearly defined priorities for the area that will help to maximise its contribution to UK productivity and allow places to make the most of their distinctive strengths. The expectation of LEPs is set out in the Governments' [policy prospectus](#). The LIS has two core aims – to increase productivity and realise potential and allow all communities to contribute to and benefit from economic prosperity. Drafting is currently underway, with an [engagement report](#) released in December 2019.
212. [SELEP's Strategic Economic Plan 2019](#) - The South East Local Enterprise Partnership (SELEP) agreed its new Economic Strategy Statement, outlining its priorities and aims to drive a more productive and prosperous economy for the area over the next decade in December 2018. The document sets out how SELEP will help meet this challenge. It sets SELEP's ambitions for the south east economy and how we will achieve them: tackling housing shortages; relieving pressure on infrastructure and improving skills across the workforce. It includes a 5 year action plan intended to deliver on the Government's National Industrial Strategy and on a pathway towards a robust Local Industrial Strategy for the South East.
213. Skills East Sussex (SES) is the County strategic body for employment and skills. [Skills East Sussex – Statement of Priorities and Activity Plan \(2017-2020\)](#) sets the aim to improve local employment and skills in order to increase economic prosperity in East Sussex. SES has identified a number of sectors and issues where it wants to make a difference by working together. SES is committed to improving the delivery of skills for the engineering, construction, health and social care, creative, digital and media and land-based sectors.

Local

214. [The Rother Economic Regeneration Strategy \(2010-2015\)](#) sets out the role that the Council will play in helping to shape the economy of Rother and supporting the businesses and people who rely on it. The Council will: promote business support and advice, improve transport and communications, work to ensure a supply of suitable business premises, encourage the development of knowledge based businesses, support the visitor economy, improve the vitality of town centres, seek to improve education and skills levels, help to overcome barriers to work and training, ensure there is an adequate supply of affordable housing, help improve the vitality of the most deprived and isolated areas, promote a positive image of the area, raise awareness and aspirations among the local community, and work in partnership with others to influence decisions. Revisions to the strategy are currently being considered.

215. [The Hastings and Bexhill Economic Development and Inclusion Strategy \(2008-2013\)](#) has three main objectives which are to:

- increase business activity and create employment, providing a range of local job opportunities and increasing average earnings;
- enable local people, particularly those who are disadvantaged, to raise their skills and aspirations and to get jobs offering stable employment and a living wage;
- achieve and maintain environmentally-sustainable prosperity, by maximising environmental benefits and opportunities, and minimising negative environmental impacts.

216. The strategy's priorities are to:

- Safeguard existing employment sites and premises, and encourage the redevelopment of out-dated stock, increasing density where appropriate;
- Expand provision of business accommodation, affordable and high quality premises, start-up and move-on accommodation, and managed workspace;
- Provide high quality office accommodation, in order to attract new business and stimulate the economy;
- Develop business locations, which are built to high environmental specifications, as well as offering quality and flexibility;

- Provide an expanding core of quality accommodation and hospitality, attractions and events, to establish Hastings and Bexhill as a year-round premier short break destination;
- Improve Hastings, St Leonards and Bexhill as retail centres, through an increase in the number and range of shops including both “comparison goods” and niche outlets, and maintaining residents’ access to local shops.

217. The [Hastings Culture Led-Regeneration Strategy 2016-2021](#) sets a vision for the renaissance of Hastings, with culture at the heart of its identity and regeneration, delivering long term economic and social benefits for all. By 2021, Hastings will be a highly desirable place to live, work, visit and invest, as follows:

- **Live:** A town where the opportunities to experience and enjoy our rich culture are embedded into the lifestyle and where cultural activities can be accessed by all - as both audience and participant.
- **Work:** A place where creative and cultural businesses and practitioners thrive; where workspace is affordable, of high quality and fit for purpose; with opportunities to develop skills, network and access peer-to-peer support.
- **Visit:** A highly desirable place that attracts UK and overseas tourists year-round to a high quality cultural offer, supported by high quality food and accommodation offer.
- **Invest:** A place that has a reputation for innovative cultural activity, that attracts and welcomes cultural and social investment, and which supports the wider economy.

218. [Hastings Seafront Strategy 2015](#) - The Strategy sets out the principles for a portfolio of projects and initiatives to be implemented as and when private and/or public sector funding becomes available. These will need to be supported by design and investment guidelines in order to avoid a fragmented approach. So a comprehensive action plan will accompany this strategy, detailing projects that can be undertaken and funded to achieve the aims of this strategy. Key Strategic Interventions include:

- **Rebalancing:** Ensure activity takes place along the whole seafront, by improvements and investment at White Rock and the St Leonards seafront.

- **West Marina:** Enable mixed-use redevelopment
- **Central St Leonards:** Improve connectivity between Central St Leonards and the beach and promenade to maximise their mutual benefit
- **Bottle Alley:** Address under-use and unsafe image, and enhance its value
- **White Rock area:** Use the 2016 Pier reopening as a catalyst for further renewal in the White Rock area.
- **Harold Place:** Improve the urban realm and linkages between Hastings Town Centre and the beach and promenade to maximise their mutual benefit.
- **Reinforce and Create Seafront Zones of Character:**
 - Hastings Old Town Seafront: Rock-a-Nore to Breeds Place
 - White Rock Zone – Breeds Place roundabout to Warrior Square
 - St Leonards zone: Warrior Square to West Marina
 - Bulverhythe zone: Combe Haven outfall to Glyne Gap

Baseline and Trends

219. The number of business enterprises in Rother and Hastings are stable or increasingly slightly in recent years. Business survival rates (5 years) have increased slightly in recent years to a baseline percentage of 43.8% for Rother and 45.8% for Hastings. However, business survival rates for the 1 year period have decreased slightly compared to the previous year's figures.
220. Unemployment rates have stayed stable in Rother and increased in Hastings to a figure of 4.3% of the economically active populations and 3.4% in Rother. Claimant counts have remained relatively stable, with a baseline figure of 2.4% for Rother and 4.4% for Hastings for the 2019 year. The percentage of children living in poverty is relatively high at 16.8% in Rother and 25.7% in Hastings. This percentage has increased slightly from the last monitoring year and shows a deteriorating trend.
221. There is a high percentage of the population with no qualifications in both local authorities, but there has been a positive increase in the number of apprenticeships undertaken in both local authorities for the 2017/2018 year.

Future baseline

222. The baseline figures that will be monitored are presented in Appendix 2 of this report. This includes information on: business enterprises, business counts, business survival rates, GVA and tourism business turnover, visitor numbers, unemployment rates, percentage of children living in poverty, skills levels and apprenticeships.

Key issues

223. The following key issues emerge from the review of relevant plans and programmes and baseline review:

- Economic performance of business is showing signs of improvement in both local authorities; however, there are still high levels of the population that are economically active population and high levels of the population with no qualifications

224. The likely evolution without the Local Plan Update is:

- Failure to provide the necessary types of business land and premises could inhibit overall economic growth.

Sustainability Objective(s)

225. In light of the key issue discussed above it is proposed that the SA should include the following objectives:

- **Economic performance is improved.**
- **There are high and stable levels of employment and diverse employment opportunities for all.**
- **Levels of poverty and social exclusion are reduced and the deprivation gap is closed in the more deprived areas.**
- **Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve.**

12. TRANSPORT

Relevant Plans and Programmes

International

226. None Identified

National

227. [The National Planning Policy Framework \(2019\)](#) sets out that transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- The potential impacts of development on transport networks can be addressed
- Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised
- Opportunities to promote walking, cycling and public transport use are identified and pursued
- The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account
- Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.
- Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.

228. The '[Future of mobility: urban strategy](#)' (2019) outlines the government's approach to maximising the benefits from transport innovation in cities and towns. It sets out the principles that will guide government's response to emerging transport technologies and business models.

229. The [Inclusive Transport Strategy \(2018\)](#) is the government's plans to make the transport system more inclusive and better for disabled people.
230. The [Transport Investment Strategy \(2017\)](#) sets out the Department for Transport's priorities and approach for future transport investment decisions.

Regional and County

231. The [Environment Strategy for East Sussex \(2020\)](#) seeks to: 'Protect and enhance our natural and built environment for current and future generations and tackle and adapt to climate change. Five priority environmental themes have been identified aligning with international and national policy, these are: climate change, natural capital, air quality, water and resource efficiency. A number of the actions identified relate to transport matters, including the action to:
- develop a Local Cycling and Walking Infrastructure Plan;
 - develop and implement an electric vehicle strategy for East Sussex.
232. The [Transport Strategy for the South East \(2019\)](#) presents a shift away from traditional approaches of transport planning – one based on planning for a future based on recent trends and forecasts – to an approach of actively choosing a preferred future and setting out a plan of how to get there. Transport for the South East's vision for the area is: By 2050, the South East of England will be a leading global region for net-zero carbon, sustainable economic growth where integrated transport, digital and energy networks have delivered a step-change in connectivity and environmental quality. A high-quality, reliable, safe and accessible transport network will offer seamless door- to-door journeys enabling our businesses to compete and trade more effectively in the global marketplace and giving our residents and visitors the highest quality of life. The strategy highlights that land use planning and transport planning must become more closely integrated. It focuses on the importance of planning for more people and places over the life of the strategy to 2050.
233. [The East Sussex County Council Local Transport Plan \(2011 to 2026\)](#) sets out the County's direction for planning and providing the transport infrastructure and services that are needed to deliver sustainable economic growth and support additional housing in the county during this period. It identifies the Bexhill to Hastings link road (Combe Valley Way) now delivered and:

- focusing on improvements and safety of key walking routes in both towns,
- developing and implement the cycle route networks for Hastings and Bexhill, focusing on key routes into the town centre, along the seafront and providing links to existing and future residential and employment areas,
- continuing development of the Quality Bus Partnership (QBP) for Hastings focused on improving services and infrastructure to deliver improved punctuality on the following key bus corridors:
 - A259 Bexhill to Hastings/Ore,
 - London Road/Battle Road,
 - Core 'Arrows' routes network running east/west across the town and through the town centre, and
 - Conquest Hospital and Bexhill & Hastings Colleges, Eastbourne/South Wealden
- developing a Quality Bus Partnership focused on improving services along the Bexhill to Hastings corridor,
- continuing to manage on-street parking in Hastings through civil parking enforcement and controlled parking zones, including appropriate reviews of parking restrictions,
- continuing to promote travel plans with businesses and schools through East Sussex County Travelchoice brand to encourage behaviour change,
- continuing to lobby for major strategic infrastructure improvements on the A21 to help deliver economic and housing growth in the Bexhill and Hastings area,
- continuing to lobby and influence, in partnership with other stakeholders, Network Rail and the train operating companies to maintain and enhance high speed rail capacity and services to accommodate growth in the area.
- investigating potential improvements across the transport network to facilitate housing and employment growth including: Bexhill Country Avenue Western Extension, Hastings Spur Road Phase 2, and junction improvements across the network to address local bottlenecks,
- measures to improve traffic movements and access on foot, by bike or by public transport in Hastings and Bexhill town centres.

234. ESCC are also preparing an emerging Local Cycling and Walking Infrastructure Plan (LCWIP). This sets out the current direction of work in this area and will be ensuring a consistent approach across the County.

Local

235. [Rother District Council's Draft Environment Strategy \(February 2020\)](#) sets out the Council's vision for reducing its impact on the environment, including detailed action plans to make Rother District carbon neutral by 2030. It identifies a need for a co-ordinated approach working closely with district leaders and stakeholder partners and identifies a range of priority areas including air quality and a series of actions which relate to address air quality which are to:

- explore options to make urban areas, such as Bexhill town centre, car free or restricted vehicular access.
- explore the use of future planning policy to require electric vehicle charging points and cycle parking to all new homes and businesses
- work with East Sussex County Council and our District and Borough partners to deliver an Electric Vehicle Plan for the County which will bring forward EV charging points across the district.
- reduce the need to own or use a car through managing developments in the Local Plan.
- bring forward initiatives which encourage walking and cycling; this includes ensuring walking and cycling friendly development is encouraged through Planning Policy.
- explore ways to incentivise taxi drivers to take up electric vehicle use.
- explore options with partners and contractors to move away from diesel vehicles to electric fleet (e.g. waste contract).

236. Transport Studies have been prepared related to the previous Local Plan production; however, these are being reviewed and where necessary will be updated as the plan develops.

Baseline and Trends

237. Baseline data from the 2011 Census is provided for residents mode of travel to work. Of particular interest is the percentage of people who walk/cycle or use public transport to travel to work which is 12.1% and 8.9% respectively in Rother District, and 17.3% and 12.1% in Hastings. The higher percentages are expected in Hastings as it is an urban authority. The percentage of people that cycle or walk at least 3 times a week for at least 10 minutes indicates the use of sustainable modes of transport for short journeys or exercise. More up to date figures are provided for the 2016/2017 monitoring year. The percentage of people that cycle at least 3 times a week is 5.0% in Rother and 3.7% in Hastings. This constitutes a slight increase from the previous year in Rother and small decrease in Hastings. With regards to walking both local authorities have shown a small reduction in the percentage with baseline figures of 15.1% in Rother and 19.9% in Hastings.

Future baseline

238. The baseline figures that will be monitored are presented in Appendix 2 of this report. This includes information on: licenced cars, residents by modes of travel to work, distance travelled to work, annual average daily flows on major roads, percentage of people cycling and walking.

Key issues

239. The following key issues emerge from the review of relevant plans and programmes and baseline review:

- There is a high dependency on the private car for travel movements, especially in rural locations
- Reduction in levels of walking in both authorities, with a reduction in cycling in Hastings.

240. The likely evolution without the Local Plan Update is:

- Continued reliance on the car, and less modal shift, with implications on air quality and public health (see also sections 3 and 12)

Sustainability Objective(s)

241. In light of the key issue discussed above it is proposed that the SA should include the following objective:

- **Road congestion and pollution levels are reduced, and there is less car dependency and greater sustainable travel choice**

13. CONCLUSIONS AND NEXT STEPS

242. The evaluation of relevant plans and programmes and baseline data and trends (summarised in Appendix 2) suggest that the key sustainability issues / problems to be addressed in the respective Local Plans are:

- Increased development has the potential to lead to increase air quality impacts from increased traffic movements, unless a modal shift away from car use to sustainable transport measures is achieved;
- Technological improvements are likely to have an impact on air quality levels over the long term which will assist the Councils ability to improve air quality, e.g. ultra-low emission vehicles.
- Development has the potential to negatively impact biodiversity and environmental designations, e.g. Local Wildlife Sites in Rother District
- The lack of active monitoring in Hastings Borough poses a potential risk to the integrity of its natural capital
- Gas consumption rates are increasing year on year and new development has the potential to increase consumption
- Domestic water consumption per capita is above national targets
- Water run-off from development and surface water flooding is an increasing local issue
- Coastal erosion has the potential to impact existing properties and future proposals. The coastal defence strategy is important for this issue moving forward
- Ageing population in Rother and falling life expectancy in Hastings Borough
- Childhood obesity in young children
- Widening gap between wages and property values, worsening access to the property markets and increasing homelessness figures across both areas
- Worsening crime statistics in both authorities
- Development has the potential to impact on built heritage, although there are opportunities to enhance heritage through sensitive design

- Increase in general household waste, with links to decrease in domestic recycling
- Changes in bathing water quality across both local authorities
- A significant proportion of Rother District is located within the High Weald AONB, which has implications for the location of new development
- There are still high levels of the population that are economically active population and high levels of the population with no qualifications
- There is a high dependency on the private car for travel movements, especially in rural locations
- Reduction in levels of walking in both authorities, with a reduction in cycling in Hastings.

Cross Boundary Implications

243. A number of these issues have cross-boundary implications for plan making that will be assessed through the Local Plans, including:

- Air quality and associated air quality impacts of transport and the cumulative impacts on human health impacts in the travel to work area and potential impacts on habitats (notably Ashdown Forest but other potential impacts need to be considered).
- SAC/SPA mitigation and management including any cumulative impacts of development in Rother and Hastings new Local Plans as well as the wider plans with a 7Km radius of designated areas.
- Approach to designation and management of Local Wildlife sites including engagement with Sussex Biodiversity Partnership.
- Environmental management and mitigation for Combe Valley Countryside Park which falls within both areas and ensuring no deterioration. There could also be measures to improve access to the Park.
- Potential for exploration of joint approach/delivery of renewable energy schemes linked to reducing energy consumption and opportunities on major development potentially to accommodate combined heat and power across boundaries where feasible.
- Liaison with the Environment Agency on flood risk and mitigation issues affecting the coastline of Rother and Hastings.

- Considering the demand for health related infrastructure across both areas.
- Considering implications at the boundary/fringe area of Hastings on the AONB, including impacts of development on distant views within both authorities
- Considering the overall demand for industrial floorspace across the area and wider sub-region, including the compatibility of local plan approaches for the growth and retention of business.
- Considering travel patterns across the wider sub-region and requirements for network improvements and transport interventions in the context of potential growth in housing and commercial development. This will also include impacts beyond through to Kent, such as Ashford and Tunbridge Wells.
- Working closely on a consistent approach to considering infrastructure delivery to support the growth anticipated in both plan areas including social and community infrastructure
- For Rother, managing recreational pressure on Romney Marsh in partnership with Folkestone & Hythe District Council, through SARMS.
- Working closely with Wealden District Council, Eastbourne Borough Council and other relevant working groups on the impacts of development on the Pevensey Levels and Ashdown Forrest.

Sustainability Appraisal Framework

244. Based on the identified issues/problems 20 sustainability objectives have been identified. These 20 objectives represent RDC and HBC's proposed SA framework which will be used to assess each authority's new Local Plan. These objectives, appraisal questions and related indicators are presented in full in Appendix B and C.

245. The next stage of the process will involve developing and refining alternatives and assessing their effects (this is Stage B of the 5-stage process outlined in the introduction of this report report). This will be based on the Sustainability Framework included in Appendix 1 as amended to reflect and comments received from Natural England, Historic England and the Environment Agency along with changes, where appropriate, in response to comments received from the other organisations consulted. A template for the assessment is

provided in Appendix 2 which will focus on capturing significant impact – positive and negative along with assessments of temporary, short term, long term and cumulative impacts.

246. A SA Report for consultation will also accompany the Rother Draft Local Plan and the Hastings Draft Local Plan for public consultation.

- The timetable for the production of RDC and the issues the plan will cover will be published in due course.
- The timetable for the production of the HBC local plan update and the issues it will cover is published its website at:
https://www.hastings.gov.uk/planning/policy/emergingpolicy_guidance/localdevelopmentscheme/

APPENDICES

APPENDIX A	Summary of Responses and Actions
APPENDIX B	SA Framework
APPENDIX C	SA Indicator Tables
APPENDIX D	Contextual Indicators and Assessment Matrix