



Rother District Council

Climate Change and Live Well Locally Background Paper

Draft (Regulation 18) Version - April 2024

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1 Introduction

- 1.1 This paper is focused on the global climate emergency, which was recognised by Rother District Council in our September 2019 declaration, and the measures of adaptation and mitigation that can be addressed through the new Local Plan. Both the Royal Town Planning Institute and the Town and Country Planning Association recognise the key role that the planning profession can play in tackling climate change and believe that it should be the top priority for the planning system across the UK¹. Central to this are the issues of the location and design of net-zero development, increasing renewable energy production, the promotion of sustainable transport and planning for nature-based solutions to cooling, overheating and carbon sequestration. These actions to tackle the climate crisis are also key to creating healthy, ecologically rich, prosperous and beautiful places.
- 1.2 This paper has focussed on the climate action aims of living well locally, renewable and low carbon energy production within the district, and net zero development. Other related planning issues such as flooding, sustainable drainage, air quality and biodiversity and green infrastructure are considered in other background papers.

¹ The Climate Crisis – a guide for local authorities on planning for climate change, third edition, October 2021, TCPA.

2 Planning Policy Framework

Legislation

- 2.1 Planning and Compulsory Purchase Act 2004 – Section 19(1) of the Act was amended by the Planning Act 2008. Section 19(1A) require local planning authorities to include in their Local Plans “*policies designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation of, and adaptation to climate change, minimising waste, managing exposure to chemicals and enhancing biosecurity.*”
- 2.2 Climate Change Act 2008 (as amended) - establishes a legally binding target to reduce the UK’s greenhouse gas emissions by at least 100%² in 2050 from 1990 levels, with interim targets set through five-yearly carbon budgets.
- 2.3 Sixth Carbon Budget CB6 (June 2021) - targets a 78% reduction in emissions by 2035.
- 2.4 Planning and Energy Act 2008 - sets out powers for local authorities to demand a proportion of the energy requirement of new development to be sourced in the locality of the development, through renewable or low-carbon generation. This could include policies to enable area-based solutions such as district heating and to require standards for energy efficiency in new buildings beyond those in the Building Regulations.
- 2.5 Environment Act 2021 – there are several planning related sections regarding BNG, air quality and nature-based solutions, however these are considered in other background papers.

National Policy

NPPF 2023

² This target was strengthened from 80 – 100% in June 2019 through the Climate Change Act 2008 (2050 Target Amendment) Order 2019

- 2.6 Chapter 2 acknowledges that members of the United Nations have agreed to pursue the 17 Global Goals for Sustainable Development in the period to 2030, *Transforming our World: the 2030 Agenda for Sustainable Development*. Paragraphs 7-14 set down the objectives of sustainable development in terms of social progress, economic well-being and environmental protection.
- 2.7 Paragraph 8 makes it clear that ‘mitigating and adapting to climate change’ is a core planning objective.
- 2.8 Paragraph 11 sets out that for plan-making this means that:
- (a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;*
- (b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*
- (i) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
- (ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*
- 2.9 Chapter 3 – Plan-making – Paragraph 20 advises that strategic policies should set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for four criteria, part (d) of which requires provision for “planning measures to address climate mitigation and adaptation.”
- 2.10 Chapter 9 - Promoting Sustainable Transport – advises that transport issues should be considered from the earliest stages of plan-making and development proposals. Paragraph 109 requires the planning system to actively manage patterns of growth and that significant development should be focussed on locations which are, or can be, made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.

- 2.11 Chapter 14 – Meeting the challenge of climate change, flooding and coastal change - Paragraph 157 states that “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.”
- 2.12 Paras 158 advises that development plans must take a pro-active 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.’ Footnote 53 to this paragraph highlights that this approach should be in line with the objectives and provisions of the Climate Change Act 2008.
- 2.13 Paragraph 159 stipulates that new development should be planned for ways that
- a) *avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and*
 - b) *can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government’s policy for national technical standards.*
- 2.14 Paras 160-164 cover **renewables**, setting out three ways to increase the use of supply:
- a) *provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);*
 - b) *consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and*
 - c) *identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers. -*

- 2.15 Also in para 161, 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.’
- 2.16 Paragraph 163, footnote 57, advises that except for applications for the repowering and life-extension of existing wind turbines, a planning application for wind energy development involving one or more turbines should not be considered acceptable unless it is in an area identified as suitable for wind energy development in the development plan or a supplementary planning document; and, following consultation, it can be demonstrated that the planning impacts identified by the affected local community have been appropriately addressed and the proposal has community support.

Written Ministerial Statements

- 2.17 Several WMS have been published concerning energy supplies, most notably:
- 2.18 9th April 2014 – a Written Ministerial Statement made by the Department for Communities and Local Government³ reinforced the amended PPG which advised that renewable energy does not automatically override environmental protections and the planning concerns of the local community. The statement sets out that:
- ‘We have also introduced a new requirement for compulsory pre-application consultation with local communities for more significant onshore wind applications (i.e. of more than 2 turbines or where the hub height of any turbine exceeds 15 metres).’*
- 2.19 25th March 2015 – a Written Ministerial Statement made by Secretary of State for Communities and Local Government⁴ made concessions to concerns on reforms to permitted development rights which were made to encourage the take up of larger

³ [Local planning and renewable energy developments - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

⁴ [Written statements - Written questions, answers and statements - UK Parliament](http://www.ukparliament.gov.uk)

solar power generation on non-domestic buildings. The WMS sets out that meeting energy goals should not be used 'to justify the wrong type of development in the wrong locations'. The statement reiterates factors set out in the Guidance:

'...we set out the particular factors relating to large scale ground mounted solar photovoltaic farms that a local council will need to consider. These include making effective use of previously developed land and, where a proposal involves agricultural land, being quite clear this is necessary and that poorer quality land is to be used in preference to land of a higher quality.'

It goes on to state:

"we want it to be clear that any proposal for a solar farm involving the best and most versatile agricultural land would need to be justified by the most compelling evidence."

- 2.20 18th June 2015 Written Statement made by Secretary of State for Communities and Local Government⁵. The statement sets out the following restrictions on wind energy development:

'When determining planning applications for wind energy development involving one or more wind turbines, local planning authorities should only grant planning permission if:

- the development site is in an area identified as suitable for wind energy development in a Local or Neighbourhood Plan; and*
- following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing.'*

- 2.21 This was subsequently confirmed in the NPPF.

Planning Practice Guidance (PPG)

Climate Change

- 2.22 Paragraph 001 sets out how 'addressing climate change is one of the core land use planning principles which the National Planning Policy Framework expects to

⁵ [1-DCLG-Planning.pdf \(parliament.uk\)](#)

underpin both plan-making and decision-taking. To be found sound, [Local Plans](#) will need to reflect this principle and enable the delivery of sustainable development in accordance with the policies in the [National Planning Policy Framework](#). These include the requirements for local authorities to [adopt proactive strategies to mitigate and adapt to climate change](#) in line with the provisions and objectives of the [Climate Change Act 2008](#), and co-operate to deliver strategic priorities which include climate change.'

2.23 The question 'How can the challenges of climate change be addressed through the Local Plan?' is addressed in paragraph 003:

'There are many opportunities to integrate climate change mitigation and adaptation objectives into the [Local Plan](#). A [Sustainability appraisal](#) can be used to help shape appropriate strategies in line with the statutory duty on climate change and ambition in the [Climate Change Act 2008](#).'

2.24 Examples of mitigating climate change by reducing emissions:

- Reducing the need to travel and providing for [sustainable transport](#)
- Providing opportunities for [renewable and low carbon energy technologies](#)
- Providing opportunities for decentralised energy and heating
- Promoting [low carbon design approaches](#) to reduce energy consumption in buildings, such as [passive solar design](#)

2.25 Examples of adapting to a changing climate:

- [Considering future climate risks when allocating development sites to ensure risks are understood over the development's lifetime](#)
- Considering the impact of and promoting design responses to [flood risk and coastal change](#) for the lifetime of the development
- Considering availability of [water and water infrastructure](#) for the lifetime of the development and design responses to promote water efficiency and [protect water quality](#)
- Promoting adaptation approaches in [design](#) policies for developments and the public realm

2.26 Para 004 How can adaptation and mitigation approaches be integrated?

When preparing Local Plans and taking planning decisions local planning authorities should pay particular attention to integrating adaptation and mitigation approaches and looking for ‘win-win’ solutions that will support sustainable development. This could be achieved in a variety of ways, for example:

- by maximising summer cooling through natural ventilation in buildings and avoiding solar gain;*
- through district heating networks that include tri-generation (combined cooling, heat and power); or*
- through the provision of multi-functional green infrastructure, which can reduce urban heat islands, manage flooding and help species adapt to climate change – as well as contributing to a pleasant environment which encourages people to walk and cycle.*

Local planning authorities should be aware of and avoid the risk of maladaptation (adaptation that could become more harmful than helpful). For example, designing buildings to maximise solar gain in winter without thinking through the implications for overheating in summer.

[Sustainability appraisal](#) and, where required, [Environmental Impact Assessment](#), can be useful for testing the integration of mitigation and adaptation measures and the long term implications of decisions.

2.27 Para 005: How can planning deal with the uncertainty of climate risks when promoting adaptation in particular developments?

‘The impact of climate change needs to be taken into account in a realistic way. In doing so, local planning authorities will want to consider:

- identifying no or low cost responses to climate risks that also deliver other benefits, such as green infrastructure that improves adaptation, biodiversity and amenity*
- building in flexibility to allow future adaptation if it is needed, such as setting back new development from rivers so that it does not make it harder to improve flood defences in future*
- the potential vulnerability of a development to climate change risk over its whole lifetime’*

2.28 Para 006 sets out the following: What evidence of risks arising from climate change is available to support local plan-making?

‘Climate change risk assessments can support the production of [Local Plans](#) by informing the [Sustainability appraisal](#).

Local risk assessments can be used to identify those climate risks, including those arising from severe weather events, that the planning system can address. Risk assessments could consider the implications for the built environment and development, infrastructure, services and biodiversity, and their subsequent implications for vulnerable groups and community cohesion. Identifying those impacts which pose most potential risk or disruption to the provision of local services will enable vulnerability to be assessed and areas suitable for development to be identified and adaptation responses to be put in place.

Other parts of a Local Plan’s evidence base will also include information on climate change risks, such as the [Strategic Flood Risk Assessment](#) and [Water Resource Management Plan and water cycle studies](#). Infrastructure providers hold information on the extent of supply and network constraints and their existing plans to reinforce those networks and capacity. Other service providers may also have carried out risk assessments that have implications for planning, such as health and social service providers.

Local studies can also be undertaken to provide a more detailed assessment of local vulnerability to climate impacts and the effects of extreme weather events.’

- 2.29 Para 011 directs planners to the Climate Change Committee website, the statutory body established under the Climate Change Act 2008, for further information and guidance.

Renewable and Low Carbon Energy section of the Planning Practice Guidance

- 2.30 Para 002 sets out that ‘LPAs are responsible for renewal and low carbon energy development of 50 megawatts or less installed capacity, under the Town and Country Planning Act 1990. Renewable and low carbon development over 50 megawatts capacity are currently considered by the Secretary of State for Energy under the [Planning Act 2008](#), and the local planning authority is a statutory consultee. It is the government’s intention to amend legislation so that all applications for onshore wind energy development are handled by local planning

authorities. Microgeneration is often [permitted development](#) and may not require an application for planning permission.’

- 2.31 In considering the potential for renewable energy the LPA must think about:
- *the range of technologies that could be accommodated and the policies needed to encourage their development in the right places;*
 - *the costs of many renewable energy technologies are falling, potentially increasing their attractiveness and the number of proposals;*
 - *different technologies have different impacts and impacts can vary by place;*
 - *the UK has legal commitments to cut greenhouse gases and meet increased energy demand from renewable sources. Whilst local authorities should design their policies to maximise renewable and low carbon energy development, there is no quota which the Local Plan has to deliver*
- 2.32 Community led renewable energy initiatives are covered in paragraph 004:
‘Community initiatives are likely to play an increasingly important role and should be encouraged as a way of providing positive local benefit from renewable energy development. Further information for communities interested in developing their own initiatives is provided by the Department of Energy and Climate Change. Local planning authorities may wish to establish policies which give positive weight to renewable and low carbon energy initiatives which have clear evidence of local community involvement and leadership.’
- 2.33 It goes on to explain the potential role of neighbourhood plans: ‘Neighbourhood plans are an opportunity for communities to plan for community led renewable energy developments. Neighbourhood Development Orders and Community Right to Build Orders can be used to grant planning permission for renewable energy development. To support community-based initiatives a local planning authority should set out clearly any strategic policies that those producing neighbourhood plans or Orders will need to consider when developing proposals that address renewable energy development.’
- 2.34 Para 005 sets out how LPAs can identify suitable areas for renewable and low carbon energy:
‘Local planning authorities will need to ensure they take into account the [requirements of the technology](#) and, critically, the potential impacts on the local environment, including

from [cumulative impacts](#). The views of local communities likely to be affected should be listened to.

When identifying suitable areas, it is also important to set out the factors that will be taken into account when considering individual proposals in these areas. These factors may be dependent on the investigatory work underpinning the identified area.'

- 2.35 A methodology on assessing the capacity for renewable energy development is included from 2014 which can be referred to.

Government Review of National Policy

- 2.36 The government's stalled White Paper 'Planning for the Future' references climate change actions throughout, detailing how the reformed planning system will achieve the necessary mitigation and adaptation for climate change.

Proposal 15: We intend to amend the National Planning Policy Framework to ensure that it targets those areas where a reformed planning system can most effectively play a role in mitigating and adapting to climate change and maximising environmental benefits.

Proposal 16: We intend to design a quicker, simpler framework for assessing environmental impacts and enhancement opportunities, that speeds up the process while protecting and enhancing the most valuable and important habitats and species in England.

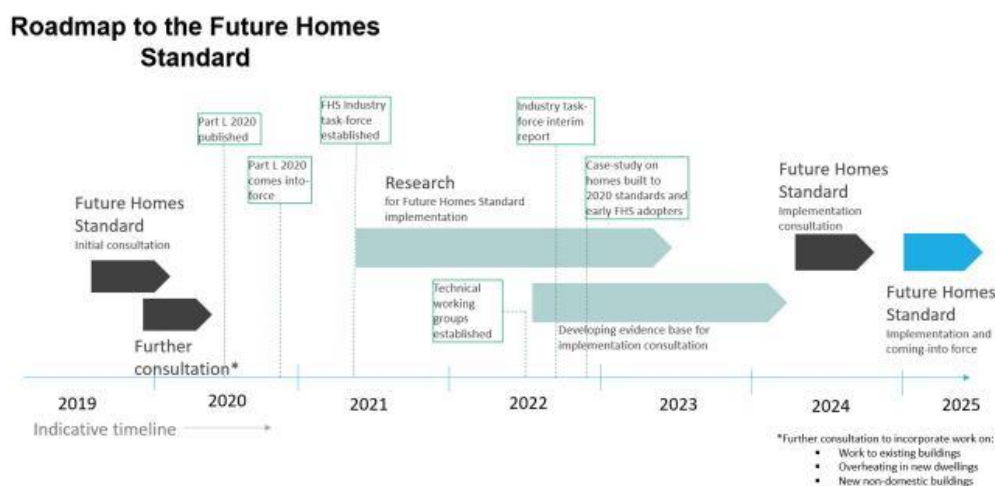
Proposal 18: To complement our planning reforms, we will facilitate ambitious improvements in the energy efficiency standards for buildings to help deliver our world-leading commitment to net-zero by 2050.

- 2.37 The consultation 'Biodiversity Net Gain Regulations and Implementation', sets out the government's proposals and asks questions about how biodiversity net gain will be applied to Town and Country Planning Act development, and, at a higher level, Nationally Significant Infrastructure Projects. The consultation ran from January to April 2022.

Future Homes and Buildings Standard

2.38 The Government’s 2019 Spring Statement introduced a commitment to a Future Homes Standard for new build homes to be future-proofed with low carbon heating and world leading levels of energy efficiency.

Figure 1: Future Homes Roadmap



2.39 This requires a considerable improvement in energy efficiency standards compared to the level currently required by Part L of the Building Regulations. These include amendments to Approved Documents Part F (Ventilation) and Part L (Conservation of Fuel and Power) an Document for Overheating (Part O) and Infrastructure for charging electric vehicles (Part S). They are focused on new non-domestic buildings and new and existing housing.

2.40 The Standard will ensure that new homes built from 2025 produce 75-80% less carbon emissions. The Future Homes Roadmap⁶ sets out the sector-wide projects and programmes that will be undertaken to meet the goals in the delivery plan. Major Building Regulations amendments were made in June 2022, with new homes in England needing to produce 30% less carbon emissions compared to the old regulations.

2.41 The new standards will be fully implemented in 2025, subject to a further public consultation running in early 2024. RDC will decide whether to consolidate or

⁶ [Future Homes Hub Delivery Plan and Roadmap](#)

expand on the standards in Local Plan policy, subject to a Written Ministerial Statement published on 13th December 2023 on Local Energy Efficiency Standards (see below)

Written Ministerial Statement 13 December 2023

2.42 The Minister of State for Housing published guidance for Local Planning Authorities setting out that Local Plans must not set local efficiency standards for buildings that go beyond current or planned building regulations. The statement goes on to set out that *‘Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures:*

- *That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework.*
- *The additional requirement is expressed as a percentage uplift of a dwelling’s Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP).*

Where plan policies go beyond current or planned building regulations, those policies should be applied flexibly to decisions on planning applications and appeals where the applicant can demonstrate that meeting the higher standards is not technically feasible, in relation to the availability of appropriate local energy infrastructure (for example adequate existing and planned grid connections) and access to adequate supply chains.’

2.43 The Government’s reasoning for this is that the proliferation of local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale.

Best Practice

Local Plans

2.44 A number of Local Plans nationally are aiming to decrease climate impacts at the same time as increasing the quality of life of local communities. We have referred to these Plans whilst reviewing our Local Plan, gaining inspiration from ones that are at a later stage in their development than our Plan review, and learning from Plans that have been through examination.

- 2.45 Greater Cambridge Local Plan – the Council produced the First Proposals of the draft Plan in December 2021⁷. The policy areas relevant to this background paper identified under the climate change theme are:
- Net zero carbon new buildings – the policy will set the levels of energy use that will be allowed for new development, how renewable energy should be used to meet that energy need, and how whole-life carbon emissions (emissions associated with constructing buildings), should be taken into account.
 - [Water efficiency in new developments](#) - This policy will set the standards of water efficiency that new developments must comply with.
 - [Designing for a changing climate](#) - This policy will set out how the design of developments should take account of our changing climate, for example extreme weather events such as heat waves and flash flooding.
 - [Renewable energy projects and infrastructure](#) – This policy will control how renewable energy generation projects and associated infrastructure should be planned and designed.
 - [Supporting land-based carbon sequestration](#) - This policy will control development of land that is capable of becoming an important carbon sink.
- 2.46 Central Lincolnshire Local Plan Review – The four authorities represented by the Local Plan decided that Central Lincolnshire would have to act now to ensure that the district would not exceed its carbon budget set out by the Tyndall Centre of 9 million tonnes of carbon by 2027. The Plan recognises that the further the area pushes the end date of consuming the 9 million tonnes beyond 2026 the greater chance they have of a smooth transition to a net zero carbon Central Lincolnshire. The evidence work for the Plan highlighted five main themes requiring policy attention:
- The need to reduce energy consumption in new build;
 - The need to generate energy from renewable sources;
 - The need to protect or enhance natural ‘carbon sinks’;
 - The need to facilitate a transition to net-zero carbon lifestyles;
 - The need to adapt to a changing climate.
- 2.47 Stroud District Local Plan Review – The Environment and Surroundings chapter sets out how the district will move towards carbon neutral by 2030, how it will

⁷ [Climate change | Greater Cambridge Shared Planning \(greatercambridgeplanning.org\)](#)

adapt to the effects of climate change and ensures development will protect and conserve the local environment. The policies that are included in the Local Plan examination relevant to this paper are:

- Sustainable construction and design
- Renewable or low carbon energy generation
- Heat supply
- Maintaining quality of life within our environmental limits

- 2.48 The renewable or low carbon energy policy is one of the few local plans to date that has allocated areas for wind energy production, not allowing the NNPF guidance that sites must be allocated in the local or neighbourhood plans, to hinder potential development.
- 2.49 Cornwall Climate Emergency Development Plan Document – the DPD responds to the climate emergency by expanding on the Local Plan approach and supporting the action required to help the district become carbon neutral by 2030. The vision of the DPD recognises that not all land-use decisions will be popular and that there will be costs attached to achieving change, but climate action is paramount. It comprises of 45 policies aimed at adapting to and mitigating climate change including Green Infrastructure Design and Maintenance, Renewable and Low Carbon Energy and Sustainable Transport. The DPD was adopted in February 2023 and its robust approach to tackling climate change is considered to be best practice due to the scope of the policies and the relatively recent date it went through examination.
- 2.50 The South Downs National Park (SDNPA) adopted a Design Guide Supplementary Planning Document (SPD) in July 2022. The SPD provides further guidance to support the implementation of South Downs Local Plan policy SD5 (Design) and other design-related Local Plan policies.
- 2.51 The document is relevant to both residential and non-residential development in the National Park.
- 2.52 The SPD sets out the Design Process the National Park ordinarily expects development schemes to take from inception to completion.

- 2.53 It also sets the Design Principles expected to guide development proposals in the National Park.

LETI Guidance

- 2.54 The Low Energy Transformation Initiative is a network of built environment professionals, working to steer the UK towards a zero carbon future. It has released a number of publications aiming to influence local and national policy; these include the following:

The Climate Emergency Design Guide – this outlines requirements for new buildings to ensure our climate change targets are met. The document represents the LETI understanding of how we must be designing to meet our climate change targets. LETI believes that by 2025, 100% of new buildings must be designed to deliver net zero carbon and the entire construction industry must be equipped with the necessary knowledge and skills. The report covers operational energy, embodied carbon, the future of heat, demand response and data disclosure.

Embodied Carbon Primer – this was published as supplementary guidance to the Climate Emergency Guide and explores embodied carbon in more detail and supports building design that delivers ambitious carbon reductions.

Climate Emergency Retrofit Guide - The guide sets out what good retrofit looks like for existing homes. Energy consumption reductions of 60-80% are targets for the average UK home. This is achievable through a whole house approach, upgrading the building fabric, incorporating energy efficiency measures, improving ventilation and fitting heat pumps.

Design for Disassembly

- 2.55 Designing for disassembly is a piece of the circular economy jigsaw as it enables buildings to be deconstructed and their components and materials reclaimed intact during renovation or demolition. These types of buildings become assets that retain their value for longer and are independent of the value of sites. Buildings can even become materials banks, with materials deposited and then withdrawn at a later date, while retaining their value.

2.56 By reusing, repairing, remanufacturing, recycling or upcycling components, systems and materials, environmental impacts can be minimised and economic value enhanced. Biodegradation or energy recovery from the materials comes only last in the list of recovery options.

Building Research Establishment (BRE)

2.57 BRE is a profit-for-purpose organisation. The BRE Trust invests in research projects for the public benefit and provides certification, testing, research and training for the built environment.

2.58 BREEAM is a suite of validation and certification systems for a sustainable built environment. BREEAM supports solutions to decarbonisation in the built environment, real estate, and associated investments by:

- Minimising carbon emissions in the [new development](#), [refurbishment](#), and [operation of assets](#).
- Providing assessment methodologies for carbon emissions, including embodied carbon.
- Encouraging the use of onsite renewables and providing credits for energy and carbon reduction.
- Providing third-party verification of carbon emission assessment.

2.59 Home Quality Mark (HQM) is a standard for new homes in the UK developed by BRE. Certified homes must achieve high standards of quality, running costs, health and wellbeing and environmental impact. The HQM gives assurance to home buyers and tenants and also enables house builders to showcase the quality of their homes and distinguish them from other homes on the market.

2.60 Pre-Demolition Audits – provide housebuilders with advice about the products and materials that can be reused or recycled prior to demolition or major refurbishment. Targets and objectives can be set within the demolition or refurbishment tender documents to ensure best practice in resource efficiency is adopted by the appointment contractor.

Regional Policy

Transport Strategy for the South East

- 2.61 The strategy is the 30-year strategy produced in 2020 by Transport for the South East. The sub-national transport body for the south-east of England brings together 16 local transport authorities, 5 local enterprise partnerships, 46 borough and district authorities and stakeholders from transport, business and the environment. The body has proposed to the government to make Transport for the South East a statutory transport body.
- 2.62 The body will carry out a number of area and thematic studies to identify the specific schemes and policy initiatives that will be needed in different parts of the region. They will assess the impact of these measures against the transport strategy's economic, social and environmental goals, including carbon emissions in the South East. Alongside the area studies, they will carry out two thematic studies: one on freight and international gateways, and the second on future mobility. The studies will be consulted on with all stakeholders.

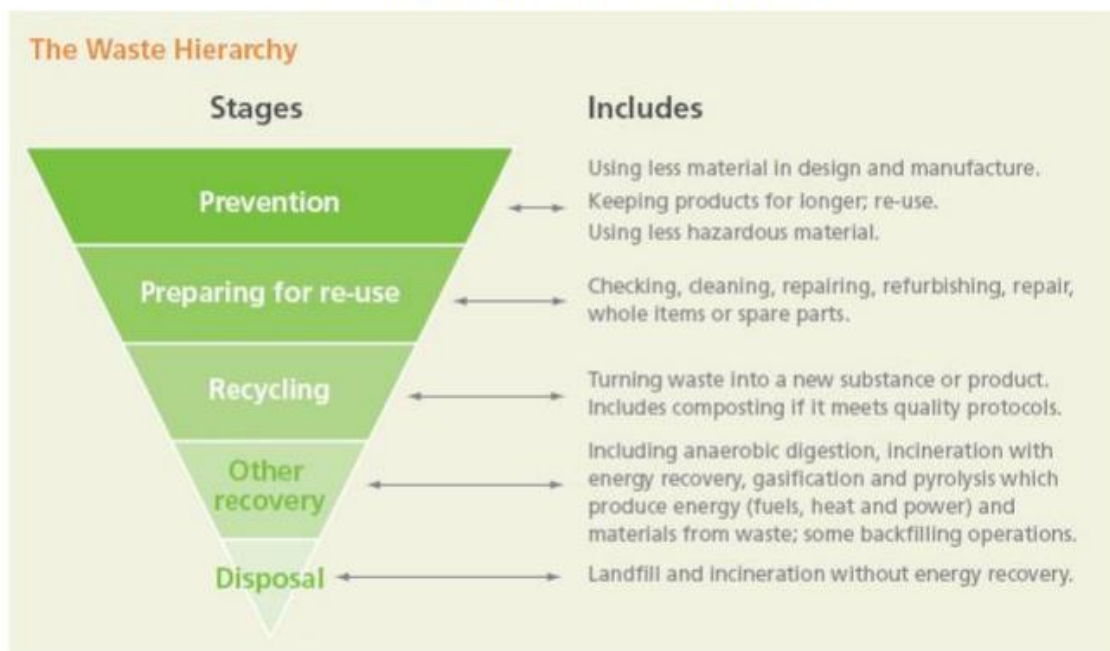
County Policy

The Waste and Minerals Local Plan for East Sussex 2013

- 2.63 ESCC's adopted Waste and Minerals Plan (February 2013) requires planning authorities to consider how waste from construction demolition and excavation works have been minimised in order to maximise the need for landfill capacity, implementing the Waste Hierarchy.

Figure 2: The Waste Hierarchy

Source: Government Review of Waste Policy, (Defra, 2011)



2.64 Policy WMP 3d: Minimising and Managing Waste During Construction, Demolition and Excavation sets out the following criteria for all development proposals to promote the capture and use of waste as a resource in the form of energy and materials :

- a. Demonstrate how the durability of the construction has been maximised;
- b. minimise the waste arising from construction, demolition and excavation activities;
- c. move the management of CDEW waste as far up the waste hierarchy as practicable;
- d. take account of relevant legislation, the guidance within the Construction & Demolition Waste SPD (including any subsequent updates); and
- e. demonstrate how they will monitor progress within the lifetime of the construction phase of the development.

2.65 The policy also keeps the requirements of the disposal of waste to a minimum.

East Sussex County Council Environment Strategy 2020⁸

2.66 The Strategy sets out the main environmental challenges for the county and an action plan to deal with them.

⁸ [Environment Strategy 2020 | East Sussex County Council](#)

2.67 The priority areas identified, which are in line with the Sustainable Development Goals developed by the United Nations in 2015, are:

- Climate change
- Natural capital
- Air quality
- Water
- Resource efficiency

2.68 Climate change only is relevant to this background paper, the following table shows the actions and indicators for the County Council’s long-term aim.

Theme	Long term aim	Actions	Indicators	Lead
Climate Change	East Sussex to remain within its science-based carbon budget	1. Develop a road map for cutting carbon emissions. 2. Develop a pipeline of projects that deliver a reduction in carbon emissions. 3. Develop and implement an electric vehicle strategy for East Sussex.	CO ₂ emissions from East Sussex.	District, Borough and County Councils

ESCC Climate Change Road Map 2022-2025

2.69 The Plan sets out that ‘the national Net Zero Strategy does not provide a national road map as to how the UK will reach net-zero, with clear roles and responsibilities as to who will cut which emissions and who will pay for what. This uncertainty is reflected in the different pathways to net zero that were described in the 6th Carbon Budget Report by the Committee on Climate Change in 2020 and in the Future Energy Scenarios set out by National Grid in 2021. The Office for Budget Responsibility concluded in 2021 that there are many possible paths ahead, each

with different implications. Consequently, in the absence of a clear national roadmap, it's not yet possible to set out a complete road map to net zero for East Sussex.'

2.70 As a result of this, the action plan only covers the period 2022-2025, a time period that the council can reliably predict it actions and associated finances.

2.71 The relevant action plan items are as follows:

No.	Theme	Action	Outputs and Outcomes	Lead
1	Transport	Produce and consult on Local Transport Plan 4	Updated local transport strategy in place aligned to net zero	East Sussex County Council
2		Develop a pipeline of cycling and walking projects	Active Access programme to continue to increase walking & cycling to school, employment and education	East Sussex County Council
3		Develop and implement a Bus Service Improvement Plan	1) More comprehensive bus networks with better coverage. 2) Increase in use of public transport.	
4		Develop a co-ordinated approach to electric vehicle (EV) chargepoints	Lay the groundwork to accelerate EV uptake	SPACES (Strategic Property Asset Collaboration in East Sussex)
5	Domestic properties	Retrofit fuel poor properties	Deliver the additional £4.2m of funding to 2023 to assist hundreds of fuel poor households	East Sussex Energy Partnership
6		Retrofit social housing by stock-	Co-ordination of social housing retrofit amongst Sussex stock	Lewes and Eastbourne Councils

		owning local authorities	owning local authorities(9,500 properties, 4% of East Sussex total)	
7		Develop Crowhurst village net zero energy plans	Develop whole community low carbon solutions	Community Energy South partners
8	Non-domestic properties	Deliver free energy audits and grants to businesses through the Low Carbon in the South East programme (LoCASE)	50 businesses awarded grants of up to £10,000 each by June 2023 to cut 450 tonnes of CO2e	East Sussex County Council and Green Growth Platform
9		Secure funding from Innovate UK to map non-domestic building	Understanding of commercial building stock in East Sussex to enable targeted interventions	South East Local Enterprise Partnership Clean Growth group
10	Renewables	Assist homeowners to purchase solar PV through Sussex Solar Together	200 households adopting solar PV per year	Local authorities
11	Behaviour change	Develop and deliver carbon literacy training for 16- 18 year olds	Every 16-18 year old to receive carbon literacy training from autumn 2022	Sussex Colleges
12	Skills & training	Develop a plan that supports a strong net zero skills base	Identify and develop new training provision required and promote careers in low carbon sectors	Skills East Sussex
13		Set up new land management training programmes	Land management training to maximise benefits of schemes such as the national Environmental Land Management Scheme	Plumpton College
14	Finance	Explore options for low carbon funding, in preparation for the Shared Prosperity Fund	Increase investment in climate change mitigation and adaptation measures in East Sussex	Team East Sussex

15	Lobby government	Present collective messages from East Sussex	Influence policy and investment in East Sussex	Dependent on each lobbying theme
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Local Transport Plan 3 (LTP3)

- 2.72 The Local Transport Plan sets out the intentions of ESCC for the period 2011-2016 based on the LTP Strategy adopted in 2011.
- 2.73 To deliver the vision a set of high-level objectives were developed in line with the local Sustainable Community Strategy, national policy and the County Council's local priorities. Tackling climate change was one of the objectives, underpinned by the following transport specific objectives:
- Reduce greenhouse gas emissions, local air pollution and noise from transport.
 - Increase the resilience of transport infrastructure and services to the effects of climate change.
 - Contribute to the protection and enhancement of the local natural and built environment.

Adopted Local Policy

Core Strategy 2014

- 2.74 Climate change is addressed in the Spatial Vision for the Plan, and introduced in paragraph 5.2:

'Living more sustainable lifestyles will require a greater awareness of and a sharper response to global warming and climate change. It will involve careful management of the area's precious but vulnerable natural and built environmental resources, including its landscape, biodiversity and water.'

- 2.75 The spatial vision for the district confirms that:

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

2.76 The Overall Spatial Strategy objectives touch on sustainability in the following objective (i)

'To guide sustainable development and help build more sustainable communities, with a balance between homes and jobs;'

2.77 Chapter 13 – Sustainable Resource Management deals with 'the conservation of natural resources and how they will be efficient and effectively utilised and managed. In particular, it considers how energy generating resources may contribute to the reduction in carbon emissions.'

2.78 Specific sections relate to:
a) towards a low carbon future and
b) Water Supply and Wastewater Management

2.79 Sustainable Resource Management Objectives:

- i) To reduce carbon emissions and move towards a low carbon future*
- ii) To maintain an adequate, safe water supply, use water resources efficiently, and avoid their pollution*

2.80 Policy SRM1: Towards a low carbon future is set out below:

'The strategy to mitigate and adapt to the impacts of climate change is to:

- (i) Require proposed developments of more than 10 dwellings or 1,000m² of non-residential floorspace to provide a comprehensive energy strategy and, for proposed developments of more than 100 dwellings or 50 apartments to require such a strategy to include an assessment of the potential for combined heat and power and district heating, subject to further assessment of the thresholds via a subsequent DPD and/or SPD;*

- (ii) *Ensure that all developments meet prevailing energy efficiency standards, and encourage them to meet higher standards and pursue low carbon or renewable energy generation, where practicable, by fully recognising related costs in assessing viability and developer contributions;*
- (iii) *Support stand-alone renewable and low carbon energy generation schemes, particularly those utilising solar, biomass and wind energy technologies, that:*
 - (a) *do not have a significant adverse impact on local amenities, ecological and heritage assets or landscape character, and*
 - (b) *in respect of locations in or adjacent to the High Weald AONB and other sensitive landscapes, are generally small in scale;*
- (iv) *Achieve high levels of energy performance on the strategic mixed use developments to the north east of Bexhill, including by Combined Heat and Power (CHP) and/or wind energy generation;*
- (v) *Reduce the carbon emissions from existing buildings by encouraging application of prevailing standards to whole buildings when extending them, supporting adaptations to be energy efficient, promoting take-up of Government energy efficiency schemes and supporting community-based energy infrastructure initiatives;*
- (vi) *Adaptation through building in resilience to anticipated climatic changes, including through green infrastructure;*
- (vii) *Promoting more sustainable travel patterns in accordance with transport policy TR2, and through widespread fast broadband coverage;*
- (viii) *Expect new developments to provide and support recycling facilities.'*

2.81 Policy SRM2: Water Supply and Wastewater Management is set out as follows:

'Effective management of water resources will be supported by:

- (i) *Ensuring that the relevant water companies are aware of and have capacity to meet demands for water, wastewater and sewerage arising from new development;*
- (ii) *Ensuring that new development does not have an adverse effect on the water quality and potential yield of water resources, in line with the objectives of the South East River Basin Management Plan, including reference to groundwater 'source protection zones';*

- (iii) *The promotion of sustainable drainage systems to control the quantity and rate of run-off as well as to improve water quality wherever practicable, and specifically for all development that creates impermeable surfaces within the hydrological catchment of the Pevensey Levels;*
- (iv) *Safeguarding land for the possible raising of Bewl Water reservoir and contributing to the development of plans that also secure Bewl Water as a recreational, economic and social amenity for the local community. (NB The safeguarded area will be defined through the Site Allocations process in conjunction with Wealden and Tunbridge Wells Councils); and*
- (v) *Ensuring that all development incorporates water efficiency measures appropriate to the scale and nature of the use proposed.'*

2.82 Chapter 17 – Environment also deals with a number of climate change related issues. The Strategic Objective with regard to the environment sets out:
'To maintain the high quality, and improve the long term stewardship, of the natural and built environment, with full regard to potential future consequences of climate change.'

2.83 This is reinforced in the Environment Objectives below:

- (i) To conserve, manage and, where appropriate enhance, the high-quality landscape resources, including the High Weald Area of Outstanding Natural Beauty and the historic built environment
- (ii) To protect important ecological resources in the district and, where appropriate, enhance these as part of a wider approach to 'green space'
- (iii) To place strong emphasis on design quality in all development
- (iv) To protect communities from flooding and effectively manage risk

2.84 Policy EN6: Flood Risk Management is detailed below:

'Flood Risk Management An effective and integrated approach to flood risk management in Rother district will be achieved by working with the relevant agencies and strategic partners to ensure that:

- (i) *The levels of flood risk protection for Rother's coast, and coastal settlements, set out the South Foreland to Beachy Head Shoreline Management Plan are delivered through appropriate schemes and maintenance regime;*

- (ii) *Protect communities wherever practicable from flooding to a level consistent with predicted sea level rise, increased river flows arising from climate change and in accordance with the Folkestone to Cliff End Flood and Erosion Management Strategy;*
- (iii) *Fluvial flood risk is minimised by implementing the policies of the Rother and Romney Catchment Flood Management Plan, Cuckmere and Sussex Havens Catchment Flood Management Plan;*
- (iv) *Proposed flood protection measures should have full regard to sensitive areas designated with specific nature conservation and biodiversity interests such as RAMSAR, SAC, SPC, LNR or SSSI.'*

2.85 Policy EN7 covers Flood Risk and Development:

'Flood risk will be taken into account at all stages in the planning process to avoid inappropriate development in areas at current or future risk from flooding, and to direct development away from areas of highest risk. Development will be permitted providing the following criteria are met:

- (i) *Where development is proposed in an area identified as at flood risk, the applicant will be required to submit a site-specific Flood Risk Assessment which demonstrates that the development will be safe, will not increase flood risk elsewhere, and, where possible, will reduce flooding;*
- (ii) *When development is, exceptionally, acceptable in flood risk areas, consideration is paid to the layout and form of development to minimise flood risk;*
- (iii) *Drainage systems and sustainable drainage systems for all new development are in accordance with the Flood and Water Management Act 2010 ⁶³;*
- (iv) *Where it is appropriate, contributions will be sought for improvements to infrastructure to mitigate against flood risk.'*

DaSA 2019

2.86 Chapter 2 covers Resource Management, the chapter is divided between water efficiency and renewable and low carbon energy.

2.87 Policy DRM1: Water Efficiency

'New development should plan positively to minimise its impact on water resources. All new dwellings are required to be designed to achieve water consumption of no more than 110 litres per person per day.'

2.88 Policy DRM2: Renewable Energy Developments

'Proposals for low carbon and renewable energy schemes, including community-led initiatives, will be supported where they accord with Core Strategy policy SRM1, where applicable, and with other policies in this Plan, including DEN1, DEN2, DEN3.'

2.89 Policy DRM3: Energy Requirements is printed below:

'The extent to which a proposal incorporates renewable and low carbon energy technologies will be a factor weighing in the favour of a proposed development. Proposed developments of more than 100 dwellings or 10,000sqm of non-residential floorspace should demonstrate that due regard has been had to energy efficiency, including through the use of renewable and low carbon energy technologies, as part of their Design and Access Statement.'

2.90 Proposals for large-scale stand-alone wind turbine schemes would be incompatible with the objectives of environmental designations across the district, although smaller schemes will be considered in accordance with the paragraph above.

Superseded adopted policy

Rother District Local Plan 2006

2.91 The aims of the Plan were:

- Aim 1 To ensure that the environment is conserved and enhanced and that new development contributes to local character, cultural identity and amenities
- Aim 2 To ensure that there is adequate infrastructure and services to support thriving communities and facilitate new development
- Aim 3 To meet housing needs in the most sustainable manner, with particular regard to affordability and quality of housing
- Aim 4 To secure a more prosperous and diverse economy

- Aim 5 To promote a safe, efficient and sustainable transport system

2.92 Relevant policy areas were:

- *Ensuring availability of infrastructure and services*
- *Renewable Energy*
- *Transport infrastructure*

2.93 The Structure Plan outlined in Appendix 2 sets out '21 Criteria for the 21st Century', required to meet the needs for development in the district in a way that is sustainable in the longer term.

3 Strategic/Corporate Policy Framework

Corporate Plan

- 3.1 The climate emergency is the first priority objective in Rother's 2020-2027 Corporate Plan: *'To establish and deliver a plan to ensure Rother District Council is carbon neutral by 2030.'*
- 3.2 Actions to achieve this aim are listed in the Plan as follows, with the first two points being identified as to be progressed through the Local Plan review:
- *By ensuring that the new Local Plan (2019-39) includes policies that demand higher bio-diversity net gain measures from developments than required by the National Planning Policy Framework, subject to evidence gathering and allowances within the regulations.*
 - *By focusing a proportion of the Rother Community Grants and Community Infrastructure Levy on infrastructure projects which reduce carbon emissions.*
 - *Increase the proportion of waste that is recycled by Rother residents.*
 - *By actively managing our green spaces to maximise carbon reduction effectiveness.*
 - *By ensuring carbon reduction clauses are included in all new Council contracts*
 - *By installing Electric Vehicle charging points to be installed in appropriate Rother District Council car parks.*

Strategy Documents

Environment Strategy 2020

- 3.3 In September 2019, RDC declared a climate emergency and pledged to become carbon neutral by 2030. Our Environment Strategy⁹ was adopted on 21 September 2020, with the following priority areas:
- Becoming a smart digital district

⁹ [Microsoft Word - Environment Strategy 2020-2030-versionSept2020 \(rother.gov.uk\)](https://rother.gov.uk/microsoft-word-environment-strategy-2020-2030-versionsept2020)

- **Green economy**
The Council pledges support in training, demand for low carbon goods accessing funds by SMEs and ethical banking.
- **Air quality and sustainable transport**
The Council pledges support to make urban areas car free or restrictive for vehicles, EV charging points for new development, improve the standard of public transport.
- **Sustainable energy**
The Council supports sustainable energy solutions for the district, and local communities to developed localised solutions.
- **Construction and existing buildings**
The Council pledges to require new homes to be passivhaus standard, to support renewable development schemes, to review council offices to ensure they meet environmental standards, and to consider the use of CIL for active travel and sustainable infrastructure. We will also ensure Council development is assessed for environmental impacts and look for funding opportunities for retro-fitting and request environmental policies for contracts over £5,000.

4 Facts and Figures

Key Facts for Rother

4.1 A data review was undertaken setting out the district's current environmental position with regards to the following issues relevant to Climate Change:

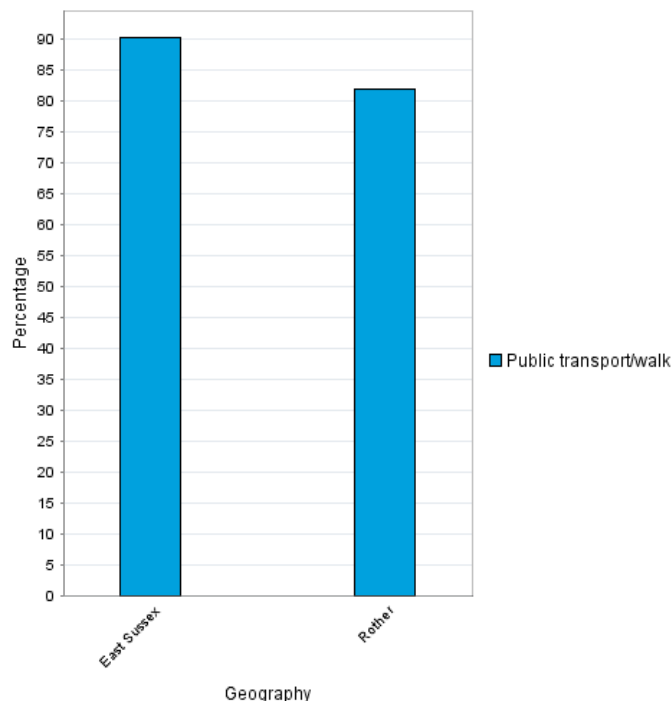
- *CO₂ emissions (for the district)*
- *Walking and cycling (for the district)*
- *Low emission vehicles (for the district)*
- *Recycling rates (for the district)*

4.2 Summaries of the data are as follows:

- *CO₂ emissions:* Rother's CO₂ emission result for 2017 (tonnes per capita) is the highest in East Sussex. In 2012 it was 5.5 tonnes p/c, so it has reduced over 5 years by 1.1 tonnes p/c.
- *Walking and Cycling:* Rother has the lowest level of adults who walk or cycle, in East Sussex; and falls below the levels for the South East region and England.
- *Low emission vehicles:* For the purposes of this data, all vehicles with fully electric power, and cars and vans with tail-pipe emissions below 75 g/km of CO₂ have been included. 'Plug in' includes fully electric or plug in hybrid vehicles. In 2018, there were a total of 65,423 licenced vehicles in Rother; ultra-low emission vehicles equated to less than 0.3% (177 vehicles) of total vehicles (see table 4 below).
- *Waste: Recycling, Reducing and Reusing:* Rother sits at rank 79 out of 345 areas for levels of recycling. During 2017-18 over 50% of household waste was recycled; total waste collected equated to 376 kilos per household. East Riding of Yorkshire Council is ranked highest with 64.5% of household waste being recycled. Newham LB was ranked lowest with only 14% of household waste being recycled.

¹ Appendix 3: Data Review 2019

Figure 3: Percentage of residents in Rother using public transport/walking



Source: Department for Transport, Journey Time statistics.

Figure 4: Carbon dioxide emissions 2015-2019 - the carbon dioxide (CO₂) emissions in kilo tonnes (kt) and the CO₂ emissions per capita in tonnes (t)

Carbon Dioxide emissions, 2015-2019

This table shows the carbon dioxide (CO₂) emissions in kilo tonnes (kt) and the CO₂ emissions per capita in tonnes (t).

Measure	Emissions in kt					Emissions per capita (t)				
	2015	2016	2017	2018	2019	2015	2016	2017	2018	2019
England	319,320	300,445	290,233	286,989	276,090	5.8	5.4	5.2	5.1	4.9
South East	47,165	45,207	43,180	42,417	40,508	5.3	5.0	4.8	4.6	4.4
East Sussex	2,168	2,072	1,969	1,943	1,856	4.0	3.8	3.6	3.5	3.3
Rother	433	430	412	409	381	4.6	4.6	4.3	4.3	4.0

Source: Department for Business, Energy & Industrial Strategy.

SA/SEA Scoping Report Indicators

- 4.3 Several of the themes of the Sustainability Appraisal are affected by climate change issues. Their performance as monitored in 2021 is as follows:

- Percentage of people in rural areas within 30 mins public transport time of services *has decreased* over the last year, but the figure is *performing against the target*.
- The condition of SSSIs in Rother *has deteriorated* from the previous year and are also *performing poorly against the target*.
- *CO₂ and water quality*: Per capita CO₂ emissions in Rother *are performing well* against the targets, as has the bathing water quality of beaches in Rother, with CO₂ emissions *improving on last year* and water quality *remaining the same*. Daily domestic water use *is no longer available* as an indicator; a suitable alternative is being looked at for future monitoring reports.
- The percentage of people in Rother with reasonable access (within 15 mins) to a town centre by public transport/walking *has reduced* from the previous year, however the monitoring report still indicates the figure is *performing adequately against the target*. The same applies to the percentage of people within 15 minutes to a town centre by public transport or walking.
- The number of planning permissions granted contrary to EA advice is *performing well against the target* and is consistent with the previous year, whilst the number of properties at risk from flooding has stayed at the same number and is *performing adequately against its target*.

All figures are from the Local Plan Monitoring Report 2021.

- 4.4 Sustainability monitoring for the emerging Local Plan regarding climate change factors is as follows:

Energy and water consumption

- 4.5 The indicator of carbon dioxide emissions is showing an *improvement*, as does industrial and commercial energy consumption, however domestic energy consumption has risen and therefore shows a *deterioration* in the trend.
- 4.6 The proportion of people who travel to work by car has decrease and shows a slight *improvement* over the last 10 year.

- 4.7 Renewable energy generation has *improved* by an increase in both photovoltaics and onshore wind. Daily domestic water use has *improved*, with a reduction in use from 2011/12.

Natural landscape indicators

- 4.8 Access to natural greenspace has *not changed* according to the indicators. This includes greenspace of at least 2ha in size being no more than 5 minutes' walk from home, accessible 20ha sites within 2km of home, a 100ha within 5km and an accessible 500ha site within 10km.

Transport

- 4.9 The number of licensed vehicles has risen indicating a *declining* trend. Modes of travel to work: private vehicle, walking/cycling, public transport and working from home have all experienced *no change* since the previous year.

5 Evidence

Evidence

Global and national

UN Sustainable Development Goals

5.1 The 2030 Agenda for Sustainable Development adopted by all United Nations Member States in 2015, provides a blueprint for peace and prosperity for people and the planet, now and into the future. At its heart are the 17 Sustainable Development Goals (SDGs), which are a call for action by all countries - developed and developing - in a global partnership. They recognise that ending poverty and other deprivations must go hand-in-hand with strategies that improve health and education, reduce inequality, and spur economic growth – all while tackling climate change and working to preserve our oceans and forests.

1. No Poverty
2. Zero Hunger
3. Good Health and Well-Being
4. Quality Education
5. Gender Equality
6. Clean Water and Sanitation
7. Affordable and Clean Energy
8. Decent Work and Economic Growth
9. Industry, Innovation and Infrastructure
10. Reduced Inequalities
11. Sustainable Cities and Communities
12. Responsible Consumption and Production
13. Climate Action
14. Life Below Water
15. Life on Land
16. Peace, Justice and Strong Institutions
17. Partnership for the Goals

Climate Change Committee – Progress Report to Parliament 2021

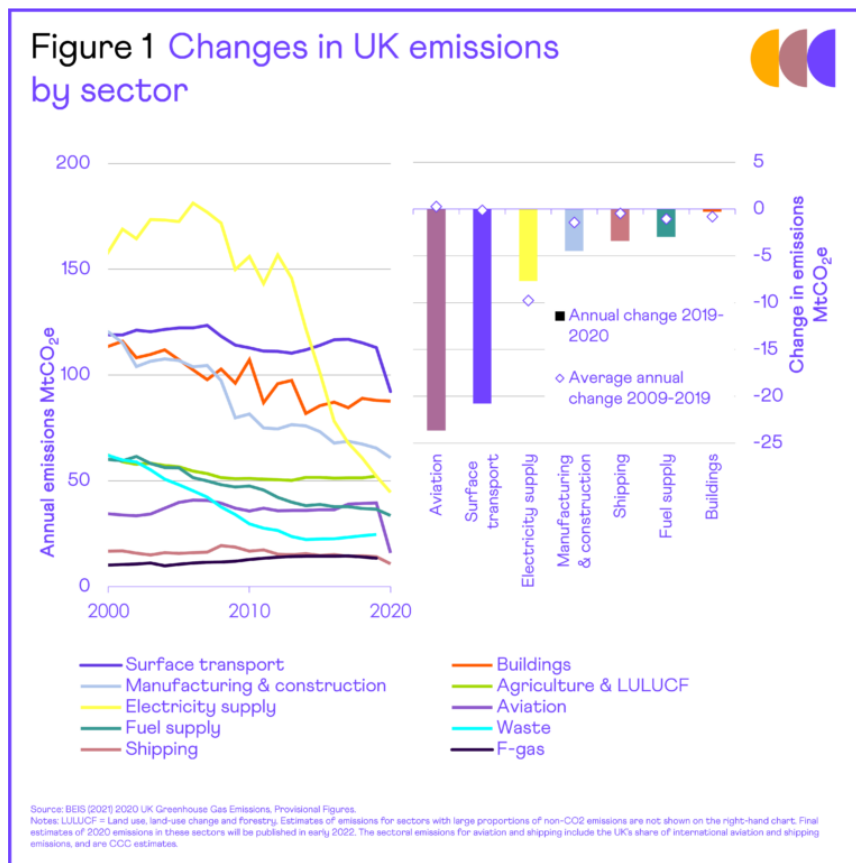
5.2 The double report – progress in reducing emissions and progress in adapting to climate change, provides a comprehensive view of the UK Government’s achievements to date on reducing emissions and adapting to climate change. The assessment offers more than 200 policy recommendations covering every part of Government. The key message was:

“The Government has made historic climate promises in the past year, for which it deserves credit. However, it has been too slow to follow these with delivery. This defining year for the UK’s climate credentials has been marred by uncertainty and delay to a host of new climate strategies. Those that have emerged have too often missed the mark. With every month of inaction, it is harder for the UK to get on track.”

5.3 Progress in net zero reports the main points as being:

- Lockdown measures led to a record decrease in UK emissions in 2020 of 13% from the previous year. Sustained reductions in emissions require sustained Government leadership, underpinned by a strong Net Zero Strategy:
- A Net Zero Test would ensure that all Government policy, including planning decisions, is compatible with UK climate targets.
- An ambitious Heat and Buildings Strategy, that works for consumers, is urgently needed.
- Delayed plans on surface transport, aviation, hydrogen, biomass and food must be delivered.
- Plans for the power sector, industrial decarbonisation, the North Sea, peat and energy from waste must be strengthened.
- The big cross-cutting challenges of public engagement, fair funding and local delivery must be tackled.

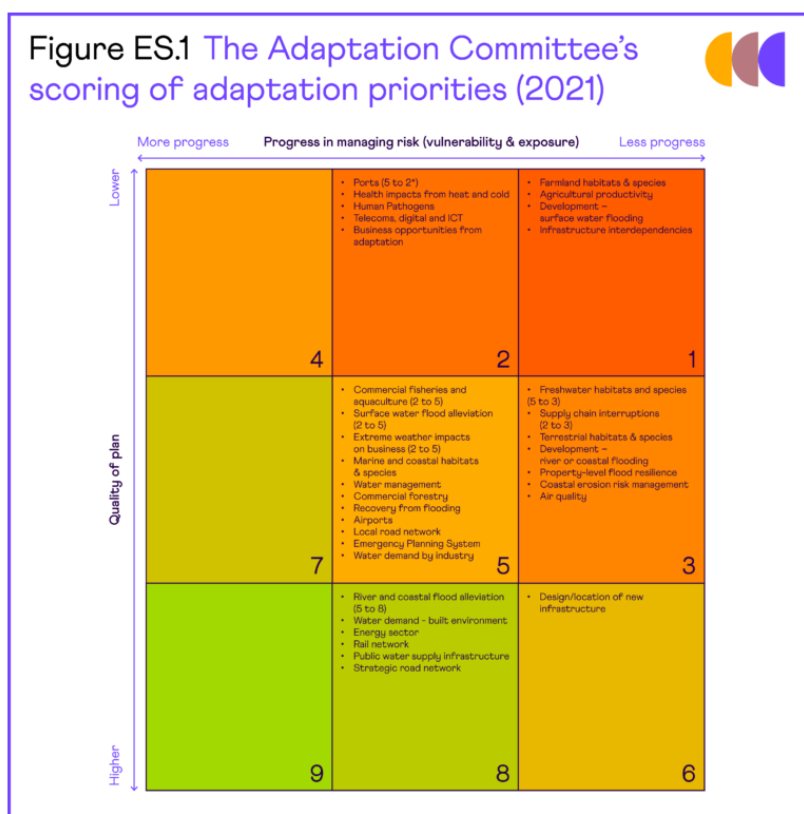
Figure 5: Changes in UK emissions by sector



5.4 Progress on adaptation in England reports that:

- Only five of 34 sectors assessed have shown notable progress in the past two years, and no sector is yet scoring highly in lowering its level of risk. The CCC provides 50 recommendations, including:
- Restore 100% of upland peat by 2045, including through a ban on rotational burning.
- Bring forward proposed plans to address overheating risk in homes through Building Regulations.
- Make the Government's next round of Adaptation Reporting mandatory for all infrastructure sectors.
- Build a strong emergency resilience capability for the UK against climate shocks, learning from the COVID-19 response.
- Implement a public engagement programme on climate change adaptation.

Figure 6: The Adaptation Committee's scoring of adaptation priorities (2021)



The Climate Crisis – A Guide for Local Planning Authorities on Planning for Climate Change, Third Edition, October 2021, TCPA and RTP1

5.5 This guide provides a robust analysis of the legislation and policy which impacts on planning for climate change. Its analysis has been utilised in writing the Planning Policy Framework (Chapter 1) of this paper. The guide highlights the vital role of planning in responding to the climate emergency and the legal duties placed of local planning authorities, supported by national planning policy and guidance. It sets out six steps for successful plan-making in response the climate crisis, which are (in summary):

- Unlock the potential of the local plan at the heart of local climate solutions.
- Understand the legal and policy obligations for action on climate change and how national targets apply to actions that can be controlled or influenced locally.

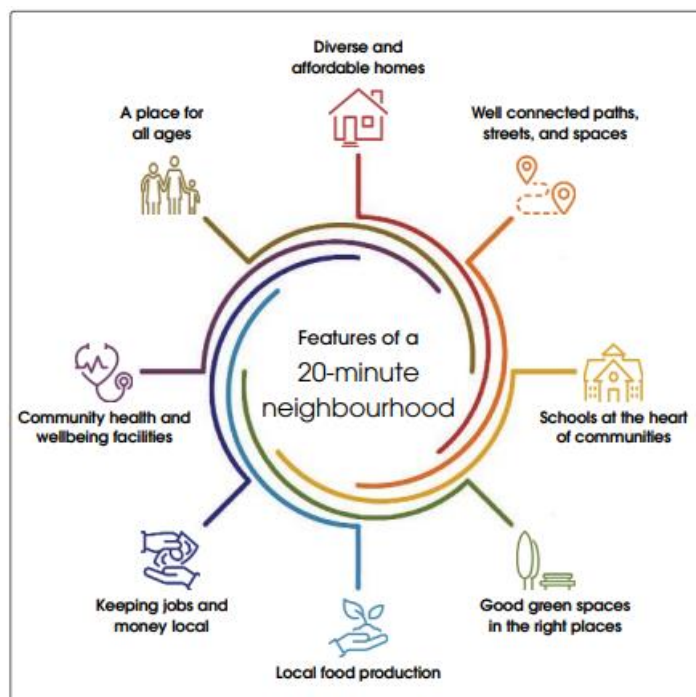
- Ensure that there is comprehensive relevant evidence on climate mitigation and use that evidence to set local carbon reduction targets for the local plan. Apply evidence of adaptation risks over a 100-year time horizon.
- Apply the evidence to assess and then select policies that are consistent with achieving carbon reduction targets. Apply rules of thumb such as credible worst-case scenarios for climate impacts to communicate that the future must be planned for.
- Use established assessment frameworks to monitor the effectiveness of policy.
- Ensure that whenever a decision is made contrary to plan policy that the climate impacts are fully assessed.

5.6 The guide is utilised, along with all the evidence set out here to define the Key Issues (Chapter 6).

TCPA – The 20-Minute Neighbourhood, March 2021

5.7 In light of the Covid pandemic lockdowns, interest has grown in neighbourhoods and the social, environmental and economic benefits that arrive from being able to take a short walk or cycle ride to access your everyday needs. The T CPA Guide to 20-Minute neighbourhood, encapsulates the potential outcomes in the following simple diagram:

Figure 7: Features of a 20-minute neighbourhood



- 5.8 The argument for these types of neighbourhoods rate the inevitable impact on climate change and cleaner air alongside the benefits of healthier communities and stronger local economies, as people focus their energy and their resources on local facilities, goods and services.
- 5.9 The characteristics shown in the diagram (Figure--) have been shown in existing 20-min neighbourhoods, aka 15-minute cities, to be part of the foundation of a thriving neighbourhood.
- 5.10 The following 10 principles, taken from established, successful schemes, demonstrate that putting the concept into practice is complex and multi-faceted:
- a compelling vision, well communicated;
 - strong, inspiring leadership;
 - empowered communities;
 - research, data, and analysis;
 - partnership and advocacy;
 - addressing inequalities;
 - adopting policy;
 - investment;

- 'hard' and 'soft' measures; and
- evaluation and adaptation.

- 5.11 In the countryside, the challenge is to towns. In market towns it can be possible to ensure that the town itself is a 20-minute neighbourhood, so that people in nearby villages only need to get to one place for most of their needs. In more rural areas, linking groups of villages by good walking and cycling networks is being explored.
- 5.12 The Local Plan will play an important role in delivering a 20-minute neighbourhood, but to be successful several critical stakeholders must be on board.
- 5.13 Investment – Financial investment, including staff and resources will be key. Planners should seek funding grants to support the delivery of the proposed projects.
- 5.14 Section 4.3 advises on applying the 20-minute neighbourhood idea to villages and rural areas - this is a pertinent chapter of the guidance, which can be applied to Rother District. Issues such as poor broadband, inferior public transport, low employment opportunities are particular to rural areas, as well as accessibility to various services.
- 5.15 It advises that two different approaches to these issues are emerging:
1. For market towns, the town itself becomes a complete 20 min Neighbourhood. People from nearby villages will need good transport links to travel to the town to use its services and once there will be able to walk within the town to find all their everyday requirements.
 2. For rural areas with small villages and no towns, the approach is to create a network of villages that collectively provide what people need on a daily basis, linked by active travel routes.
- 5.16 There are proposed frameworks supporting this approach e.g. Scotland's Fourth National Planning Framework embraces the 20-minute neighbourhood concept., Velo-City won the National Infrastructure Commission's ideas competition with a vision for village clusters linked by cycle routes.

[Living Locally in Rural Wales, RTPI Cymru Discussion Paper, January 2022](#)

- 5.17 This paper explores the concept of living locally in rural Wales and considers whether the guiding principles behind the 15-minute neighbourhood model can be applied in more remote rural areas.
- 5.18 It finds that the principles need to be applied flexibly and an additional principle to address 'local productivity and enterprise' – for example relating to agricultural diversification or support for local businesses to cater for the needs of the local community.
- 5.19 It advises that the adaptable nature of the concept of living locally means it can evolve to suit the individual place, taking into account the local context and what makes it distinctive.
- 5.20 It concludes that the elements of living locally in rural areas, relevant to rural areas, might include (but are not limited to):
- Continuing to focus housing development within established, well connected communities;
 - Developing digital infrastructure to support local productivity, services, enterprise and communities;
 - Improving sustainable and inclusive local bus and rail services;
 - Investing in active travel networks where suitable which provide connectivity to centres of services and public transport hubs; and
 - Encouraging investment and creative initiatives which focus support services in accessible centres, including post offices, banking services, community and public services.

20 Minute Neighbourhoods and the Scottish Policy Context – report from practitioner roundtable, January 2022

- 5.21 This report by Scottish Rural Action, Scottish Rural & Islands Transport Community and SURF – Scotland's Regeneration Forum, sets out the outcomes from a roundtable discussion on the application of 20-minute neighbourhoods to rural and island communities.
- 5.22 It concluded that the 20-minute method can be a useful conversation tool to support community-led place planning, enabling communities to explore what 'living well locally' means to them, but that unintended negative impacts are likely to arise

when the method is applied as part of a top-down planning process, for example to shape Local Plans. This is because, they concluded, it risks exacerbating the centralisation of rural services and reinforcing structural and institutional barriers to addressing poverty and inequality in rural and island communities.

- 5.23 It concluded that the 20-minute neighbourhood concept could be reframed as a 30 or 45 minute neighbourhood in a rural context, with a strong narrative on ‘living well locally’ adopted in planning policy.

RTPI Net Zero Transport: The role of spatial planning and place-based solutions (2021)

- 5.24 This research explores how different place typologies can achieve an 80% reduction in surface transport emissions by 2030.
- 5.25 The basic Sustainable Accessibility and Mobility Framework (SAM) hierarchy used takes a place-based approach prioritising measures which reduce the need to travel, followed by those which shift trips to active, public and shared transport, and lastly those which switch vehicles to cleaner fuels. The study states that by following this hierarchy decarbonisation acts as a catalyst for reducing car dependency and creating ‘healthier safer and more equitable communities.’ If the only measure put in place is switching to cleaner fuels, this would only account for just over half of the necessary emission reduction, so a more holistic approach is required.
- 5.26 The study states that urban renewal should be prioritised by the planning system, enabling growth at the same time as achieving a substantial reduction in travel demand.

‘This should focus on maximising the potential for local living by ensuring that most people can access a wide range of services, facilities and public spaces by walking and cycling. Increased home working, digital service delivery, and new forms of flexible work and community spaces will play a key role, alongside investment in place.’

- 5.27 Key to achieving decarbonisation is a shift from the conventional approach of meeting predicted change in travel demand with new road capacity. The planning system must also look beyond the promotion, allocation and servicing of land for

new development. Land use planning must deliver place-based visions which meet ambitious targets for trip reduction, modal shift and carbon reduction in tandem with other environmental, economic and social objectives.

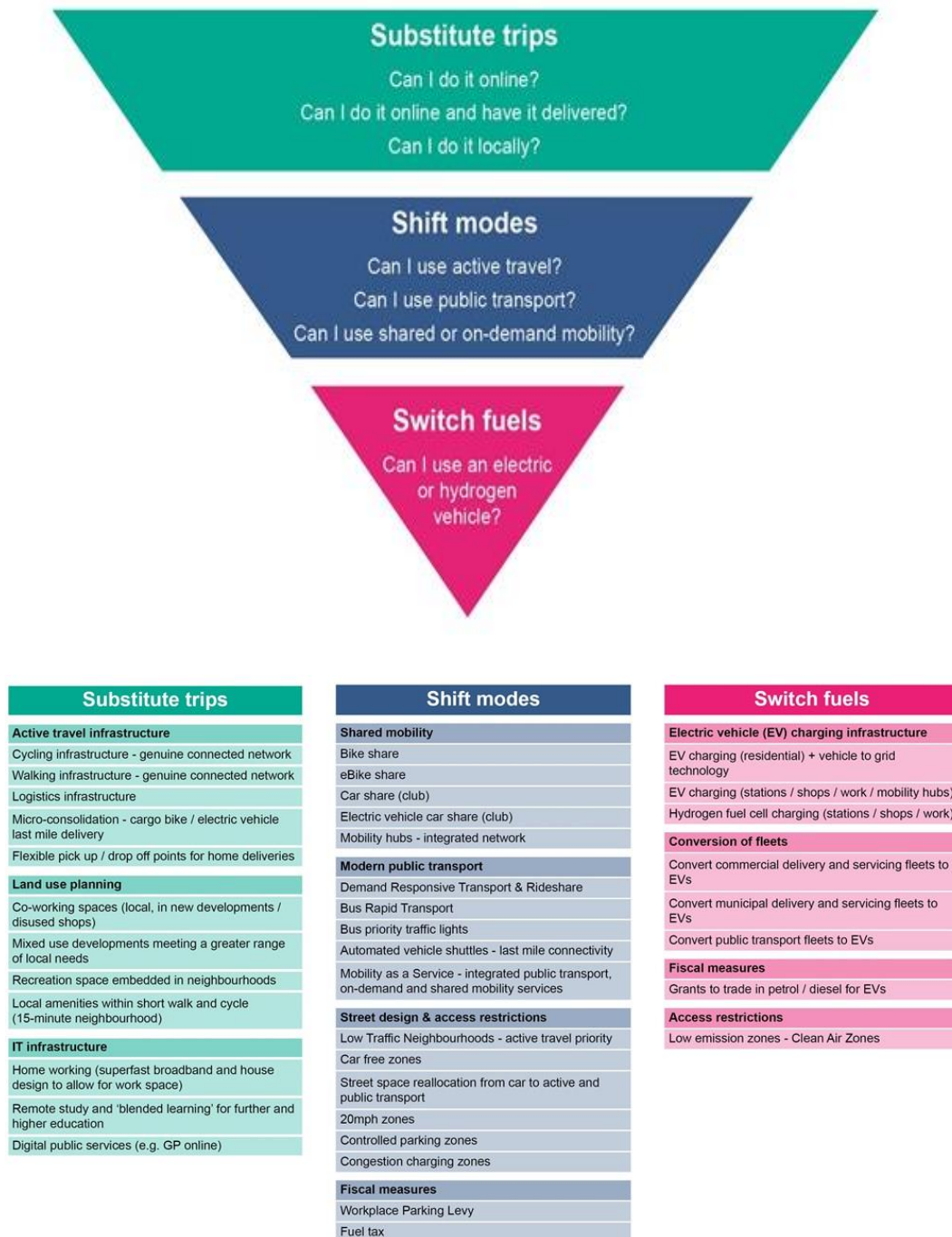
5.28 The research created a spatial vision for each of the place typologies in 2030: a unicentric city, a polycentric conurbation, a regeneration town and a growing county. The vision maps out key carbon reduction interventions which show how an ambitious reduction pathway may look for different types of place and identifies the wider benefits.

5.29 The research starts from the premise that there is a clear relationship between spatial planning and carbon and that only a place-based approach can deliver net zero transport emissions and be a catalyst for better place-making. To date the planning system frequently delivers the wrong type of development in the wrong place and does not fully consider the impact of development on carbon emissions. *“a place-based approach to net zero transport should focus on solutions that create better places and healthier, happier, more resilient communities. These objectives are critical to good planning, linking the imperative to reduce transport emissions with wider objectives related to decarbonisation, housing growth and nature recovery.”*

Sustainable Accessibility and Mobility Network (SAM) Framework

- Substitute Trips: Replace the need to travel beyond your community
- Shift modes: For longer trips, use active, public and shared forms of transport
- Switch fuels: For any trips that must be made by car, ensure the vehicle is zero emission

Figure 8: SAM Framework

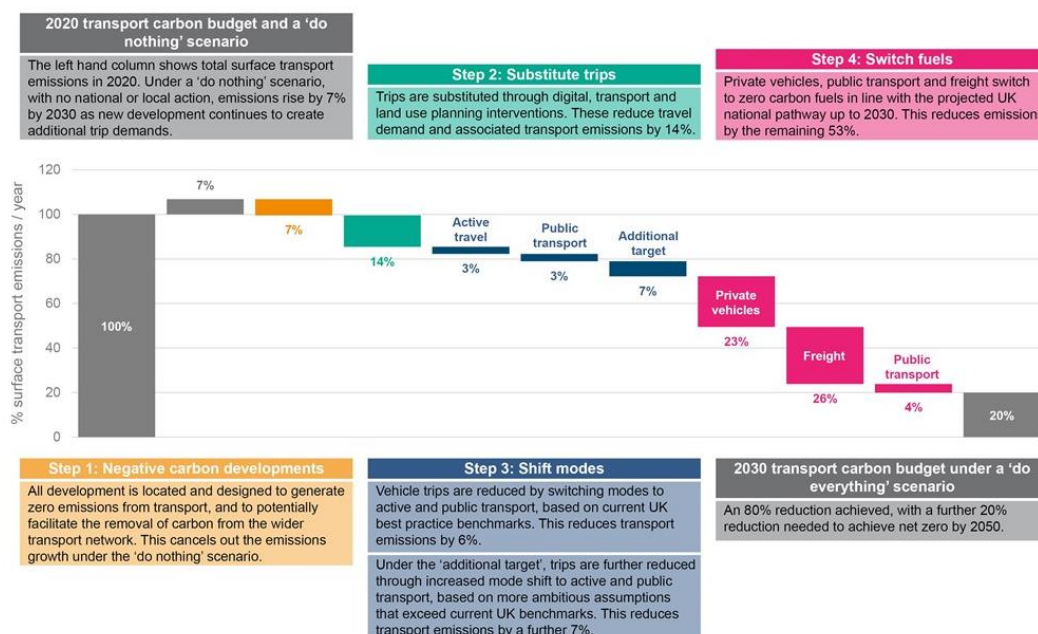


5.30 The research found that no single intervention, or combination of interventions is enough to reach the 80% reduction target in surface transport emissions by 2030. Also, in order to achieve the 80% reduction, progress in reducing the number of trips and increasing the share of journeys made via walking, Cycling and electric public transport must exceed the best practice scenarios that previous evidence

suggests is possible. This reflects how far behind the UK transport is on the road to decarbonisation.

- 5.31 There is an urgent need now to move away from the traditional ‘predict and provide’ approach of the UK transport planning and towards a ‘vision and validate’ approach that sets clear targets for trip reduction, mode sharing and carbon emissions. Effective implementation will be achieved only through an integrated approach between transport and land use planning, which puts carbon reduction at the top of priorities.

Figure 9: An 80% carbon reduction pathway for 2020 to 2030



Planning for net zero transport – a new model of spatial planning

- 5.32 Without radical change the transport and land use planning systems are not going to deliver the net zero outcomes required to meet our legal targets and avoid catastrophic climate change. The report emphasises that the planning system in England is overly focussed on the promotion and delivery of housing and commercial development without giving enough consideration to the impact on carbon emissions, or the vital role of place making in local living. The focus is too often focussed on the current business model of private developers, but not the creation of good quality homes in sustainable communities. Furthermore, transport planning is constrained by the traditional approach of predicting demand and

providing road capacity to meet it, when it needs to be focussing on trip reduction and the promotion of active and public transport as true alternatives to the private car. Both planning systems often work in isolation.

- 5.33 Planning outcomes have to look beyond numerical housing targets, road capacity and architectural design. Net zero must be a prerequisite of new development and a priority of urban renewal. The outcomes must cover all of the elements that combine to make great places e.g. accessible local amenities for work and leisure, child-friendly streets, multi-functional GI, and a sense of place and belonging that encourages people to want to live and work locally and travel less.

25 Year Environment Plan 2018 - 'A Green Future: Our 25 Year Plan to Improve the Environment'

- 5.34 The targets of the environment plan include achieving clean air, clean and plentiful water, thriving plants and wildlife, reducing the risks of harm from environmental hazards, using resources from nature sustainably, mitigating and adapting to climate change, minimising waste, managing exposure to chemicals and enhancing biosecurity.

Place Principle and Place Standards – Scotland

- 5.35 The Place Principle has been developed to 'tackle complex problems' – the significant health, climate and fiscal, and socio-economic challenges that communities are facing. Place-based approaches are collaborative, requiring collective action that brings knowledge, experience and creativity together to understand how to deliver multiple benefits.
- 5.36 The Place Principle is the over-arching context for place -based working in Scotland. It recognises that:
- *Place is where people, location and resources combine to create a sense of identity and purpose, and is at the heart of addressing the needs and realising the full potential of communities. Places are shaped by the way resources, services and assets are directed and used by the people who live in and invest in them*

- *A more joined-up, collaborative, and participative approach to services, land and buildings, across all sectors within a place, enables better outcomes for everyone and increased opportunities for people and communities to shape their own lives.*

5.37 And requests that:

- *all those responsible for providing services and looking after assets in a place need to work and plan together, and with local communities, to improve the lives of people, support inclusive and sustainable economic growth and create more successful places.*
- *there is a commitment to a collaborative, place-based approach with a shared purpose to support a clear way forward for all services, assets and investments which will maximise the impact of their combined resources.*

'Building for a Healthy Life' (BHL) (June 2020)

5.38 'Building for a Healthy Life is the new name and edition of 'Building for Life 12', a government-endorsed industry standard for well-designed places. Written in partnership with Homes England, NHS England and NHS Improvement, BHL consists of a series of considerations designed to help structure discussions between local communities, local planning authorities, developers and other stakeholders, and to help local planning authorities assess the quality of proposed and completed developments.

5.39 Organised across three headings, 12 considerations are presented to help those involved in new developments to think about the qualities of successful places and how these can be best applied to the individual characteristics of a site and its wider context. These three headings will guide you from macro through to micro scale considerations.

5.40 Each consideration is illustrated with clear written and visual prompts helping you to identify good practice and avoid common pitfalls.

5.41 BHL can help local communities to set clear expectations of new developments by offering a series of easy-to-understand considerations that will also allow local communities to more easily identify the qualities (or deficiencies) of development proposals.

'ATE Planning Application Assessment Toolkit' (May 2023)

- 5.42 The 'ATE Planning Application Assessment Toolkit' was published by Active Travel England. It helps to assess the active travel merits – walking, wheeling and cycling – of a development proposal – based on existing national and local active travel policy requirements.
- 5.43 Active Travel England's has an overall objective for half of all journeys in towns and cities to be cycled or walked by 2030, transforming the role that walking and cycling play in England's transport system and making it a great walking and cycling nation.

'Active Design' (May 2023)

- 5.44 'Active Design' was published by Sport England with support from Active Travel England and the Office for Health Improvement and Disparities. Active Design sets out how the design of our environments can help people to lead more physically active and healthy lives. It's about helping to create 'active environments'.
- 5.45 Active environments are the spaces and places for people to be active. They are not just focused on delivering opportunities for sport and formal exercise. They seek to encourage all physical activity — such as active travel, children's play, outdoor leisure and anything else that maximises opportunities for people to be active, as well as sport and exercise. By providing opportunities for physical activity, active environments can help improve the physical and mental health of adults and children.
- 5.46 Where we live, work, travel and play has a major role in shaping our activity choices. By applying Active Design principles to our built and natural environments, we can create active environments that encourage people to be active through their everyday lives.
- 5.47 Through the promotion of the Active Design 'Ten Principles', the guide seeks to help planners, designers and everyone involved in delivering and managing our places to create and maintain active environments.

- 5.48 The Ten Principles of Active Design are:

1. Activity for all.
2. Walkable Communities.
3. Providing connected active travel routes.
4. Mixing uses & co-locating facilities.
5. Active buildings, inside and out.
6. Providing activity infrastructure.
7. High-quality streets & spaces.
8. Network of multi-functional open spaces.
9. Maintaining high-quality flexible spaces.
10. Activating spaces.

RDC Evidence

RDC Renewable and Low Carbon Energy Background Paper November 2016

- 5.49 The paper considers the potential and impacts of wind turbines, biomass, solar and other technologies: district heating systems ground source heating and hydropower. The NPPF expects LPAs to have positive strategy to promote energy from renewable and low carbon sources.
- 5.50 The Council's earlier '*Low Carbon & Renewable Potential Study*' (2010) noted that, overall; the District has good opportunities for low carbon and renewable technologies, particularly wind and biomass. Other technologies such as solar technologies and ground source heating are also suitable but will need to be subject to more detailed analysis on a site by site basis. These individual technologies are the subjects of subsequent sections.
- 5.51 Positive support for renewable and low carbon energy is consistent with the aims of AONB designation. The High Weald AONB Unit states '*It is clear that there is a significant potential for the generation of renewable energy as electricity and heat within the High Weald AONB.*' It also considers that this protected landscape only allows for small-scale renewable energy schemes.
- 5.52 Energy Statement/ Strategy - The Planning Advisory Service advises that an energy statement should be a requirement of development. Rother's Core Strategy (Policy SRM1(i)) was one of few local plans that required proposed developments above

certain thresholds to provide a comprehensive energy strategy. These were set at a low level of 10 dwellings or 1,000sqm of non-residential floorspace .

- 5.53 The background paper noted that in practice, the policy was difficult to apply. This raised questions about whether the threshold should be amended (e.g. from 10 dwellings to 50 dwellings to be more realistic and/or whether there is a need to clarify what the Energy Statement/Strategy should include).
- 5.54 The paper suggested that the Energy Strategy/Statement could realistically address the following matters:
- A site-specific feasibility study into different renewable or low carbon technologies.
 - Proposals for improved fabric thermal efficiencies
 - Proposals for increased heating, hot water, ventilation and lighting efficiencies
 - A review of the location of any local heat network
- 5.55 The paper suggested that the requirements of Policy SRM1(i) seemed to be unduly onerous on small development and that the threshold to provide an energy strategy or statement could be increased to developments of more than 50 or non-residential developments of 5,000m² of floorspace.
- 5.56 Policy SRM1(i) was replaced with DaSA Policy DRM3, which was considered to be consistent with the NPPF's policy to 'support the move to a low carbon future' (paragraph 95) by introducing a development management policy that states that, at any scale of development, a scheme that positively embraces options for renewable and low carbon energy will be a factor weighing in the favour of a proposed development. It also raised the threshold for developers required to demonstrate that due regard has been had to energy efficiency, including through the use of renewable and low carbon energy technologies, to 100 dwellings or 10,000sqm of non-residential floorspace.
- 5.57 Wind turbines – There are good opportunities in the district. The Low Carbon and Renewable Potential Study suggests that the most appropriate developments may be single turbine or small clusters of up to 3 turbines, probably of 1.5-2MW capacity.

- 5.58 The HW AONB Energy Use and Generation Audit noted that a high deployment of small-scale wind turbines can in theory provide a significant contribution to electricity demand. Although large turbines have more output, there opportunities are more limited in Rother. Potential locations are Fairlight, Hastings and Heathfield Ridge, which factor in the requirement of consistent wind speeds in excess of 6-6.5 metres per second.
- 5.59 Ministerial Statement - On the 18th June 2015, a Ministerial Statement was published by the Government with regards to development involving more than one wind turbine. The details of this have been set out above in chapter. The general view from the industry is that the WMS makes it difficult to get on-shore wind turbines approved.
- 5.60 Biomass – if the fuel used consists of fuel waste or construction wood waste this is a County planning matter, however if the wood is from woodland management it is a district planning matter. There are still relatively few large CHP plants in the region, as the following map shows:

Figure 10: CHP installations across the South-East



- 5.61 A proposal in Northiam was refused on grounds of scale, AONB impact and 24-hour traffic movements. Several smaller biomass boilers have since been approved.

5.62 Theoretically there is significant potential from local wood sources, which will also support woodland management.

5.63 Areas of potential – there is the greatest concentration of managed woodland around Battle, Netherfield and Mountfield, locations which also have a decent connection with the A2100/A21.

5.64 The former South East Plan had a useful policy (NRM16), which cited the following as factors in the consideration of biomass plants:

'The proximity of biomass combustion plants to the fuel source and the adequacy of local transport networks; and availability of connection to the electricity distribution network.'

5.65 Large scale biomass plants seem to be less viable in the district, however smaller scale plants, particularly ones fuelled by wood fuel, may be viable with potential in more rural parts of the district, concentrating on those areas that are 'fuel poor' due to not having gas connections to the main gas network.

5.66 Solar – The PPG section on Renewable and Low Carbon Energy provides extensive guidance on solar energy (paragraph 013):

- The extent to which there may be additional impacts if solar arrays follow the daily movement of the sun;
- The colour and appearance of the modules, particularly if not a standard design.
- The need for, and impact of, security measures such as lights and fencing;
- The potential to mitigate landscape and visual impacts through, for example, screening with native hedges;
- The importance of siting systems in situations where they can collect the most energy from the sun. The energy generating potential, which can vary for a number of reasons including, latitude and aspect.

5.67 Active solar technology, (photovoltaic and solar water heating) on or related to a particular building is often permitted development provided the installation is not of an unusual design or does not involve a listed building or ancient monument or is within a designated area.

- 5.68 Information on network capacity, including mapping, is available from UK Power Networks. The High Weald Energy Use and Generation Audit, dated January 2011, considers the potential of the designated area to contribute to a low carbon economy. The report noted that there could be potential for electricity generated by large scale solar PV farms, however *'The highest potential for roll-out of renewable energy technologies at a local building-integrated level is likely to be roof mounted solar PV and solar thermal systems, (and biomass boilers/ stoves).'*
- 5.69 Options are solar roofs, the preferred option for large scale solar arrays, and ground mounted solar, however the AONB and other protected areas of the district do not lend themselves to large scale ground mounted commercial solar farms, despite it being recognised that the farms are temporary structures and can be removed entirely when no longer in use. Proposals should be accompanied by an ecology study and habitat management plan.
- 5.70 District Heating Systems – The national heat map and the UK Combined Heat and Power (CHP) development map are published by the [Department for Business, Energy & Industrial Strategy](#).
- 5.71 The South East England Partnership Board had already assessed the potential for CHP and Distributed Heat and identified that Rother *does not* have a high level of strategic opportunity for this type of renewable energy. Localised systems were considered:
- District heating networks are only viable in areas of high heat demand density, ideally with a mix of uses; and
 - Opportunities for policy intervention are primarily in areas of new development and their surroundings – there are significant barriers to retrofit solutions, not least the inertia of entrenched ideas and systems.
- 5.72 Even when taking into account these considerations the 'Low Carbon and Renewable Potential Study (2010)' noted that the opportunities for district heating are low in Rother. Because of this the study did not consider it necessary to carry out heat demand mapping of the district.

5.73 Ground Source Heating and Cooling Schemes – these use the solar energy stored in the ground, and in ground water, to heat and cool buildings. Generally permitted development, so it has previously been considered that a policy is not necessary. Furthermore, the EA regulates the open-loop ground source heating and cooling schemes through permits and licences. The EA has concerns about schemes near groundwater source protection zones • contaminated land • rivers • wetlands • cesspits or septic tanks, as GSHC schemes can damage the water environment. This is shown in the map below.

Figure 11: Sensitive locations for Ground Source Heating and Cooling

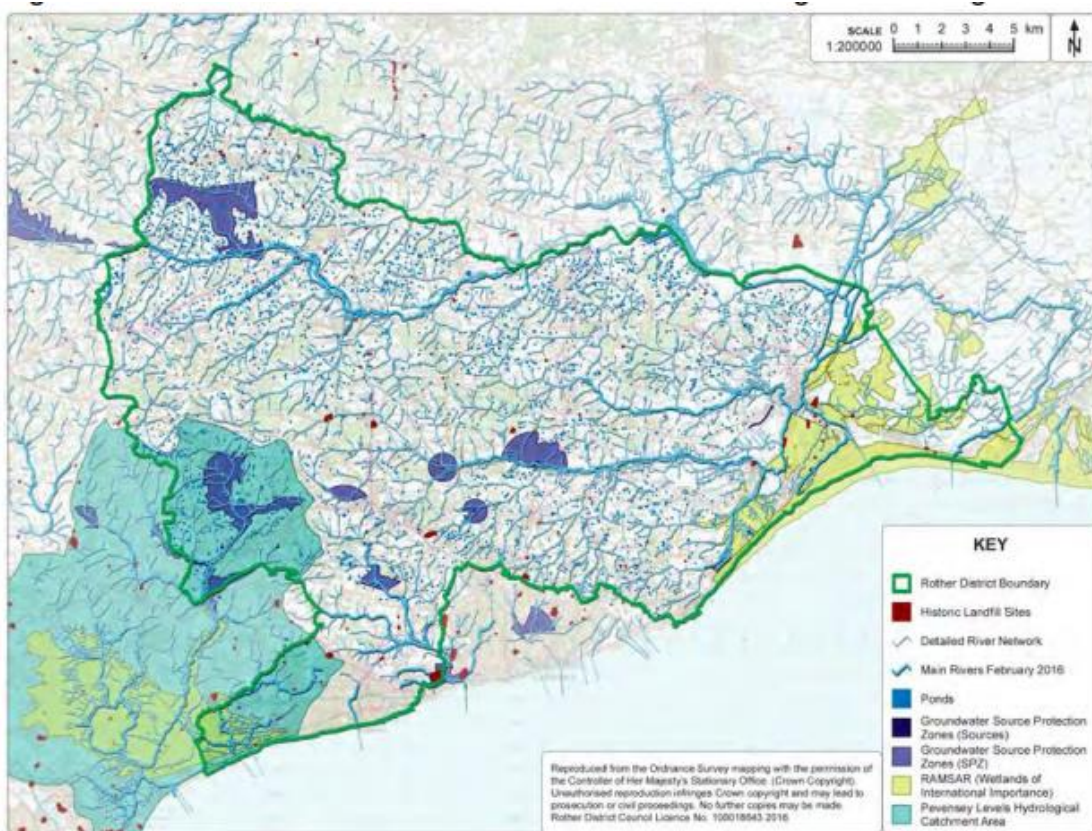
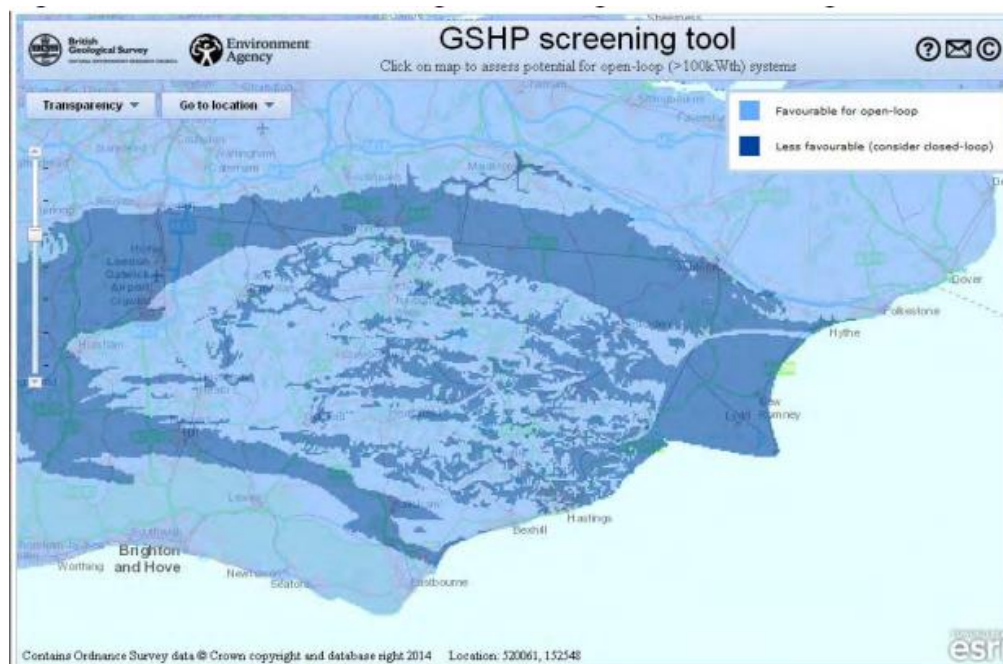


Figure 12: Ground Source Heating and Cooling



Source: British Geological Survey & Environment Agency

- 5.74 Hydropower - The Rother DC 'Low Carbon and Renewable Potential Study (2010) assessed and concluded that Rother offers no opportunities for large, medium or small scales on hydro installations due to the geography and river flow conditions of the district.

Rother District Wind Energy Feasibility Study May 2021

- 5.75 The study provides updated guidance for the potential siting of wind energy developments in the boundaries of the district.

Figure 13: Turbine scales and dimensions (for the purpose of the study)

Turbine Scale	Tip Height (m)	Rotor Diameter (m)	Hub Height (m)	Power	Source
Large	135	100	85	2.5 MW	Industry standard for planning applications
Medium	115	90	70	2.3 MW	To match the dimensions of the Little Cheyne Court Wind Farm turbines (Nordex N90/2500 ⁹)
Small	60	39	40.5	500 kW	Dimensions of the mid-size Distributed Generation Ltd turbines ¹⁰ .

- 5.76 The report identifies that an area in Rye/Camber/Playden has the most potential for a range of turbine sizes based on:

- its proximity to an already established wind farm, Little Cheyne Court Wind Farm (LCCWF), which may provide a precedent for similar planning
- the fact that LCCWF has similar topography indicating sufficient wind resource for power generation
- the potential for large scale turbines will allow for increased power output and economies of scale

5.77 The alternative sites in North and West of Bexhill, do not offer the same advantages as Rye/Camber/ Playden, after initial investigation. Public and community consultation is yet to be undertaken.

Climate Change Study - Ove Arup & Partners September 2023

5.78 RDC commissioned multi-disciplinary consultants Ove Arup & Partners to produce a Climate Change Study for the district as a key document for the district's net zero evidence base. The report brings together inputs from specialists in town planning, quantity surveying, climate and sustainability to present a comprehensive view of Rother's current context in terms of carbon emissions, sequestration, renewable energy, and planning policies. These study areas fed into the modelling and analysis of carbon impacts of different spatial growth scenarios and net zero building measures and finally into a series of policy recommendations which reflect the findings of the carbon and renewable energy analysis and build upon examples of policy best practice elsewhere.

5.79 The report is set out in the following sections:

- **Understanding Rother Today** which establishes the carbon emissions baseline and policy context for Rother
- **Examining Best Practice** identifies examples of measures which have been applied elsewhere including industry standards and policy case studies.
- **Synthesising Policy Options** assesses how the measures taken from best practice apply to Rother in three policy packages.
- **Carbon Impacts of Growth Scenarios** applies carbon modelling techniques to three spatial growth scenarios to guide development and transport throughout the district. This modelling indicates the relative performance of each scenario in terms of carbon emissions and sequestration.

- **Net Zero Buildings Analysis of Rother Typologies** builds upon the previous chapters to examine the potential impacts of building typologies in Rother on future carbon emissions and measures which may be implemented to improve efficiency.
- **Carbon Impacts of Policy Options** applies carbon modelling techniques to three policy packages to indicate relative performance of each package in terms of carbon emissions
- **Net Zero Buildings Feasibility and Costs** provides further detail of the feasibility and cost implications of implementing net zero building requirements
- **Renewable Energy and District Heat Network Analysis** sets out the opportunities and implications for renewable energy and district heat networks within Rother.
- **Net Zero Buildings Policy Recommendations** bring together the findings of the previous chapters into a series of policy recommendations based upon the results of the carbon analysis

5.80 The report contains key recommendations to achieve carbon reductions in the district, covering how buildings are constructed, where they are located and how they are grouped, as determined through local plan site allocations and growth scenarios.

5.81 Recommendations for growth scenarios indicate that the 'intensification of urban areas' option shows the largest potential for sustainable growth. Intensification reduces gross floor area in residential development and in turn a reduced heating demand. Intensification also goes hand in hand with the assumptions of district heating to serve non-residential loads, and the intensification of urban areas would also reduce trip levels and mileage, encouraging a mode shift to EV uptake and active travel.

5.82 This option is beneficial as it allows local authorities to use the Local Plan to influence heating demand and look for ways to meet this sustainably through low-carbon heat networks. The installation of on-site PV is recommended because PV would minimise emissions associated with growth whilst creating opportunities to decarbonise existing stock. Battery storage and decentralised networks should be prioritised to optimise emissions savings and maximise cost benefits. PV initiatives have potential to benefit all three growth option scenarios.

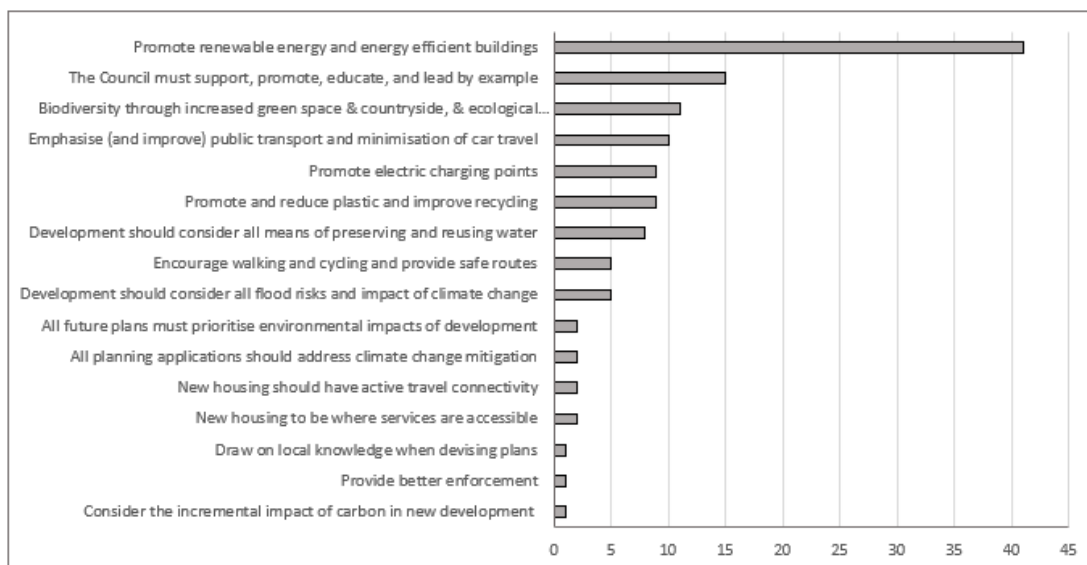
- 5.83 The development of brownfield areas and the intensification of urban centres should be prioritised (although it is recognised that options are limited in Rother) and land with high sequestration potential is advised to be protected and enhanced wherever possible.
- 5.84 Recommendations for Local Plan policy cover the following policy areas:
- Net zero building standards for minor and major residential development (including conversions)
 - Net zero new building standards for minor and major non-residential development (including conversions)
 - Heat network requirements for residential and non-residential development
 - Net zero refurbishment standards for minor and major residential and non-residential development
- 5.85 The recommendations set out policy targets for recognised net zero standards and requirements for energy statements, energy provision and monitoring.

6 Consultation and Engagement

Early Engagement Responses

- 6.1 The Council has published its Early Engagement Document and Strategy which set out how the Council would engage throughout the Local Plan process. It contains a table that outlines how the Council will undertake their Duty to Cooperate functions with partner organisations. Alongside this, the Council conducted a wide-ranging questionnaire on all matters that the emerging Local Plan could address.
- 6.2 The following question was asked regarding climate change:
‘What suggestions do you have for the Council to fulfil its commitments to addressing the wider strategic climate emergency through planning policies?’
- 6.3 The bar chart below compiles the responses. Renewal energy promotion and energy efficient buildings comes at the top of respondent’s priorities.

Figure 14: Responses regarding addressing the climate emergency



- 6.4 **Actions** - The overriding response to help meeting the Council’s Climate Emergency was promoting renewable energy and energy efficient buildings, with the Council leading by example, with improving biodiversity and sustainable transport modes being other popular responses.

6.5 The Council will be proactively looking to help meet the Climate emergency by delivering schemes and developing policy which supports carbon neutrality and other ambitions of the Climate emergency. The Planning Policy team will need to work collaboratively with other departments within the Council along with external partners in order to deliver its ambitions.

Climate Change Steering Group - comprises of 8 Councillors

6.6 The Group was established by Cabinet to develop, plan and initiate the steps that the council will take to meet the carbon neutral target of the 2019 declared Climate Change Emergency.

6.7 The objectives of the Group are as follows:

- To produce an action plan or strategy that is designed to ensure that the operations of the Council are carbon neutral by 2030.
- To identify relevant existing powers that the Council may exercise, and any additional powers to be requested from Central Government, that could be used to encourage carbon neutrality throughout the district.
- To identify which policies, strategies and working practices of the Council might require amendment, and to outline a timescale for reviewing these.
- Identify and consult with existing external bodies and partnerships; and make recommendations on new partnerships that should be established to help achieve the 2030 target.
- Identify citizens across Rother who are climate champions for their communities and to use them to inform on ideas to implement locally.
- To investigate all possible sources of external funding and match funding to support this commitment.
- Investigate what Rother District Council can do to minimise the emission of gases other than CO₂ which adversely affect climate change.
- To present a pre-consultation draft action plan to Council for consideration no later than 24 February 2020, including recommendations for next steps and resource requirements.

6.8 In January 2022 the ToR were amended to add two further objectives:

- To agree and monitor a set of Key Performance Indicators to ensure that the Council meets its carbon neutral objective by 2030.
- To investigate all possible sources of external and internal funding, including the Council's Community Infrastructure Levy's Climate Emergency Bonus Fund and match funding to support this commitment.

Working Groups

- 6.9 Cross department working groups were set up with the intention/aim of discussing policy development with officers who were likely to have an interest in the topic areas, due to the impact the policy could potentially have on their area of work.
- 6.10 A general introduction to the background paper and the topic areas of living well locally, net zero development and renewable energy generation were discussed at the first meeting, with officers invited to make initial comments on the topics and on the 'green to the core' approach of the new Local Plan.
- 6.11 The discussion was broadly focussed around the viability of policy proposals, retrofitting and the importance of policy aspirations being broadly aligned with those of neighbouring LPAs, Wealden and Hastings. Other issues highlighted were the impact on affordable housing and consume demand i.e. house buyers who want net zero homes due to the climate impact and also for reduced energy costs.

Duty to Cooperate

- 6.12 Climate change is a strategic issue and RDC is working with neighbouring authorities to deliver a comprehensive policy approach based on a shared evidence base.

7 Key Issues

7.1 The previous chapters have highlighted existing policies addressing the climate emergency and evidence of how this must be accelerated. The Core Strategy 2014 set a framework for adaptation and mitigation through two sustainable resource management policies: SRM1 'Towards a low carbon future' and SRM2 'Water supply and wastewater management'. Both mitigation and adaptation criteria are set out within each policy.

7.2 The DaSA expanded on these in the Resource Management chapter with policies DRM1: Water efficiency, DRM2: Renewable energy developments and DRM3: Energy requirements, setting policy for water efficiency, low carbon and renewable energy schemes and the support of proposals which incorporate renewable and low carbon energy generation.

7.3 Section 19(1A) of the Planning and Compulsory Purchase Act 2004 (as amended in 2008) requires development plan documents to include policies 'designed to secure' climate mitigation and adaptation. This requires, in terms of mitigation, planning for a 'radical reduction in emissions'¹⁰ to support the net-zero commitment under the Climate Change Act 2008:

- An understanding of baseline CO² emissions and local trends to identify Rother's opportunities and challenges¹¹.
- A spatial strategy to enable people to live well locally (supporting local facilities and active and shared transport improvements)¹² through an adapted 20-minute neighbourhood approach.
- Setting net-zero carbon standards for new development¹³.
- Prioritising decentralised renewable and low-carbon energy supplies¹⁴ (including electric vehicle infrastructure).

7.4 In terms of adaptation, this requires:

¹⁰ Paragraph 152 of the NPPF, 2021

¹¹ Paragraph 007 of the Climate Change section of the Planning Practice Guidance (PPG)

¹² Paragraph 007 as above

¹³ Planning and Energy Act 2008

¹⁴ Paragraphs 001 and 003 of the Climate Change section of the Planning Practice Guidance (PPG)

- Building in resilience to water-based change by minimising the risk and impact of flooding; protecting water quality and conserving water supplies¹⁵; and
- Delivering linked multi-functional green infrastructure and local nature recovery areas that maximise carbon storage and sequestration; achieve meaningful biodiversity net gain and support our community's adaptation through better local facilities and services, greater interaction, connection with nature and local food production.

Adaptation measures are addressed in other background papers.

7.5 We have drawn extensively on the research published by the TCPA and the RTPi documenting how the planning system is well placed if not vital to address the current crisis, and their proposed strategies to ensure that planning delivers carbon reduction through land use policies.

7.6 Once the evidence base was reviewed the following key issues were identified:

- Live Well Locally
- Net Zero Development
- Renewable Energy Generation
- Water Efficiency

Live Well Locally

7.7 The Living Well Locally concept is explored in the Development Strategy background paper and, in brief, should consider the following issues to meet the local planning authority's climate change response obligations:

- Consideration of the impact of 'On-demand' bus services (East Sussex Bus Service Improvement Plan and Transport Strategy for the South East), acknowledgement that car ownership in Rother has declined and how to encourage a continued modal shift.

¹⁵ Paragraph 153 of the NPPF, 2021 and the Flood and Water Management Act 2010

- Living locally approaches are necessary for both towns and rural areas, i.e. linked villages with shared services e.g. Hurst Green-Ticehurst-Etchingham and also town hubs with easy access from satellite villages e.g. Battle -Netherfield-Crowhurst.
- Cycling & walking plans- Rother has the lowest levels of adults who walk or cycle in East Sussex (Environmental Statement). Monitoring shows that the numbers of the local population with reasonable access to a town centre has decreased.
- The opportunities this spatial concept provides for transitioning to Net Zero Transport through a transport hierarchy – *Substitute trips*: co-working spaces (local, in new development/disused shops), mixed use development meeting a greater range of local needs, recreation space embedded in neighbourhoods, local amenities within a short walk/cycle ride. *Shift modes*: active travel and public transport. *Switch fuels*: accessible and local EV charging infrastructure
- Ensuring an integrated approach between land use and transport planning (Rother DC and East Sussex CC)
- A place-based vision, moving away from traditional ‘predict and provide’ approach to transport planning.

Net-Zero Carbon Development

7.8 Carbon emissions from the built environment are responsible for 25% of the UK’s total GHG emissions¹⁶. Reducing these will be one of the key objectives of RDC’s net zero strategy, achieved through the implementation of planning policy which will address the following issues:

- Levels of energy use to be set for all new development
- Decentralised heating and energy or district heating networks in new development.
- Energy Statement requirements for new development as per RDC Core Strategy, option to lower threshold from 10 dwellings
- Low carbon design approaches, passivhaus and solar design (see PPG)
- Green self-build (*evidence needed*)

¹⁶ [Climate change - UKGBC - UK Green Building Council](#)

Renewable Energy Generation

7.9 We are planning for all new development to generate sufficient renewable energy to supply the development and potentially off-site need. Our evidence base will determine the most suitable methods of generation for the district, the thresholds of development size to which this will be applicable and recommended levels of energy use. Key issues are:

- Energy in all new development over a specified number of units to be generated by on site renewables
- Identified sites for renewables: solar roofs on commercial buildings and ground mounted solar considering AONB constraints, wind power (Little Cheyne Court site in Rye)
- Neighbourhood Plans encouraged to allocate renewable sites.

8 Vision and Spatial Objectives for the Local Plan

Vision

- 8.1 The Council declared a climate emergency in 2019 when the UK Government amending the Climate Change Act 2008 to set a target for emissions in the UK to become net zero by 2050. The Council have pledged to support net zero through the development of planning policy as well as other areas that the council has influence.
- 8.2 The over-arching objective of the Local Plan is to mitigate and adapt to climate change; this is embodied in our 'Green to the Core' concept. This policy approach will underpin each policy area of the Plan, shaping places to contribute to radical reductions in carbon emissions and planning for long-term climate change adaptation. The Plan seeks to protect the District's strong rural and coastal character setting, the High Weald Area of Outstanding Natural Beauty (AONB) and all other environmental land designations. As mentioned above/earlier, the priority areas emerging from the council's early engagement are renewable energy promotion and energy efficient buildings, contributing to the net zero commitment of the Climate Change Act, and which will be reflected in policy.
- 8.3 Sustainable communities will be resilient to the effects of climate change through the implementation of policy that both allows mitigation and adaptation, moving towards net zero emissions and renewable energy supplies which will minimise the risk and impact of flooding, encourage green infrastructure and create biodiversity net gain.
- 8.4 Neighbourhood planning will continue to be used by communities in order to steer the location and type of development in towns and parishes and will place a greater emphasis on the design of low carbon development. Conversations with Parish and Town Councils will allow an exchange of ideas about how community commitment to climate action will be harnessed/integrated to create local solutions/interventions that really work for each neighbourhood.

Spatial Objectives

- 8.5 The Plan will seek to create and support zero carbon communities, one of the key tenets of being Green to the Core, supporting the net zero commitment of the Climate Change Act 2008 and more recently the Government's 6th Carbon Budget. Development will be guided by principle of 'living locally', providing for people to live, work and play in their local area by supporting local facilities, employment opportunities and active and shared transport options as well as electric vehicle infrastructure.

Objective 1: Climate Emergency

- 8.6 'The Local Plan will respond to the Climate Emergency by shaping places in ways that contribute to radical reductions in carbon emissions and delivering its zero carbon ambitions through effective supportive planning policies.'
- 8.7 This will be achieved by working with other departments and key partners to deliver renewable energy schemes and provide local solutions which can be delivered by organisations, local individuals and town and parish councils. This will be enabled by planning policy that supports delivery of zero carbon ambitions whilst still encouraging viable development.

Objective 7: Sustainable Locations

- 8.8 'Focus growth in sustainable locations across the District, or places that can be made sustainable through supporting infrastructure and community facilities.'
- 8.9 The Settlements Review and HELAA will help to understand the sustainability of Rother towns and villages and identify locations for potential development. Once this process is complete the IDP will assist in prioritising strategic and local infrastructure needs.

Objective 8: 'Local Communities'

'Enhance the sustainability and connectivity of local communities through sustainable transport measures and improved internet network coverage.'

- 8.10 This will be achieved by using the outcomes to both the Settlement Review, which provides a greater understanding of sustainability and the form and function of towns and villages, and the Local Plan Transport Assessment, which will look into ways to enhance sustainable transport options. Part of this process will require the LPA to liaise with infrastructure providers as part of the IDP.

Objective 10: Neighbourhood Planning

- 8.11 ‘Balance strategic planning with the opportunities for local delivery through neighbourhood planning and support the delivery of community renewable energy schemes.’
- 8.12 Neighbourhood Plans are recognised for their role in harnessing community energy and channelling it into local issues. The Council will work with Parish and Town Councils to make sure there is a balance between strategic delivery and ensure the conversations include the delivery of renewable energy at a local level.

9 Policy Options

Introduction

- 9.1 The Plan will incorporate both mitigation and adaptation policy, as required by the Planning and Compulsory Purchase Act 2004, and broadly be divided into two climate action approaches of ‘Placemaking’ and ‘Delivery and Development’.
- 9.2 ‘Placemaking’ policy will address ‘live well locally’, sustainable transport and active travel, and combine high quality public spaces with vital multi-functional green infrastructure whilst supporting local nature networks, meeting the expectations of residents and visitors to experience beautiful places, socialise in welcoming spaces, grow their own food and benefit from good health and well-being in their own neighbourhood.
- 9.3 ‘Delivery and Development’ policy will set net zero standards for new development, seek opportunities for local renewable energy and low carbon energy supplies, including how much heating a building will need as well as setting targets for overall energy use in buildings and seek to minimise the risk of flooding and protect water supplies.

Live Well Locally

Supporting text:

- 9.4 The RTPI have published a clear hierarchy on the changes required to people’s day to day living, in order to achieve carbon net zero by 2050. Local Plan monitoring on walking and cycling in Rother highlights some of the challenges faced in introducing this concept across the district, with the numbers of both being the lowest in East Sussex. Furthermore, the percentage of people in rural areas within 30 minutes transport time of services has decreased over the last year as has the percentage of people within reasonable access (15 mins) to a town centre by public transport or walking. Superfast broadband cover of 87%, and ultra-fast of only 1%, compared with London’s 80% coverage, contribute to the challenge of ‘living locally’ being achieved in Rother.

9.5 The live locally policies will:

Facilitate Working Locally

- Encourage opportunities for employment units and flexible work/co-working spaces e.g. village halls, community centres, employment site allocation for pods/units, which facilitate this. It will also support NPs to deliver the same locally (see *Hurst Green NP Policy HG17: Supporting Local Employment Opportunities* [Hurst-Green-Neighbourhood-Plan-Pre-Submission-Draft-July-2022.pdf \(hurstgreen2030.uk\)](#)).

Support Active Transport

- Support the scope of Parish Councils and neighbourhood plans to promote PROWs (NALC and Highways Act). Support initiatives which identify across district routes, linking spatial clusters and beyond. Local networks, accentuate/compliment PROW with cycleways Wheelchair access.
- Support introduction of 'quiet-ways' (ESCC).
- Support and integrate with sustainable transport projects such as 'Greenways'.
- Low traffic neighbourhoods/areas or car free zones

Support and Encourage Local Services

- Support allocations for doctor surgeries and not support change of use away from surgeries, support small retail units
- Enhance how rural clusters relate to each other and promote shared services between villages.
- Mixed-use development meets a range of local needs. These policy areas are appraised through the development strategy.

Live Well Locally Policy 1: Compact Development

Proposals for new residential development must contribute to achieving well-designed, attractive, and healthy places that make efficient use of land and deliver appropriate densities. The following density ranges, expressed as dwellings per hectare (dph), will apply to different area types, as defined by Rother's Density Study:

- a. Urban areas in Bexhill, Battle and Rye: 60-80 dph, with higher densities around transport hubs and town and district centres.
- b. Suburban areas in Bexhill, Battle, Hasting Fringes and Rye: 40-50 dph.
- c. Live well locally areas: 45-60 dph.
- d. Villages areas (villages with development boundaries): 20-40 dph.
- e. Countryside areas (villages and hamlets without development boundaries): in the instances where residential development is supported by policies in this plan, the density should reflect the existing character of the area.

Development proposals must meet the minimum density in the ranges above, unless there are overriding reasons concerning townscape, landscape character, design, and environmental impact. This will support a critical mass for multiple local services/facilities and the viability of public transport including Demand Responsive Transport (DRT), shuttle bus services and car clubs.

Densities in excess of the maximum will be encouraged within these zones where the development is the result of a robust high-quality design-led approach; there is good access to shops, services and public transport connections; and/or the proposals are in accordance with a neighbourhood plan, design code or other adopted policy guidance.

Alternative policy

The alternative would be to not have a new policy. Existing Local Plan policy would continue to be pertinent/carry forward:

Core Strategy policy

Policy SRM1: Towards a low carbon future

The strategy to mitigate and adapt to the impacts of climate change is to:

- vii) Promoting more sustainable travel patterns in accordance with transport policy TR2, and through widespread fast broadband coverage;

Policy TR2: Integrated Transport:

- (iii) Supporting the provision of a high-quality cycle network to encourage a modal shift away from the car

(iv) Improvements to the pedestrian environment and wider public realm to encourage integration between different modes of transport, employment areas and settlement centres

DaSA policy

None relevant

Live Well Locally Policy 2: Facilities & Services

(A) All development proposals for one or more new dwellings must meet the following criteria:

i) **Accessible Centres.**

In Urban, Suburban and 'Live Well Locally' Area types, be located within an 800m safe, usable walking distance of a mix of local amenities (either within the site or outside but accessed via an accessible walking network) appropriate to the development proposed. Examples of local amenities include:

- a. A food shop which sells fresh fruit & vegetables.
- b. A park or green space.
- c. An indoor meeting place (pub, cafe, community centre, place of worship)
- d. A primary school
- e. A post office or bank
- f. A GP surgery

In Village and Countryside Area Types be located within an acceptable safe, useable walking or cycling distance of the listed mix of local amenities. This may be more than 800m.

Where a mix of local amenities are not accessible by walking and cycling, development must be located on safe, useable walking routes, that are an appropriate distance to a suitable bus stop facility, served by an appropriate public transport service(s), which connects to destination(s) in a site's respective sub-area that contains the remaining local amenities.

ii) **Public Squares + Spaces.** Provide, or contribute to, a connected and accessible network of safe, attractive, varied public squares and open spaces with paths and other routes into and through, places to rest and interact e.g. benches and other types of seating and provide good signage and wayfinding

that is accessible to all. This should form part of a wider connected accessible Green Infrastructure network which includes food growing opportunities (allotments and community gardens) and prioritises locally native plant species.

iii) **Play, Sports, Food Growing Opportunities + Recreational Facilities.** Provide, or contribute to, play, sports, food growing opportunities and other recreational facilities that must not be hidden away within developments but located in prominent safe, secure, overlooked locations that can help encourage new and existing residents of all ages and abilities to share a space. Whether public or privately managed there must be well considered management arrangements and a long-term maintenance plan.

(B) All development proposals of more than 150 dwellings must meet the following criteria:

(i) **Indoor Meeting Place.** Either by upgrading existing facilities, such as school or village halls, or by contributing to a new facility, provide a digitally connected, flexible and multifunctional indoor place that meets the needs of the community and is suitable for co-working, hosting events such as markets, training and to supports social prescribing.

Alternative policy

The alternative would be to not have a new policy. Existing Local Plan policy would continue to be pertinent/carry forward:

Core Strategy policy

Policy SRM1: Towards a low carbon future

The strategy to mitigate and adapt to the impacts of climate change is to:

vii) Promoting more sustainable travel patterns in accordance with transport policy TR2, and through widespread fast broadband coverage;

Policy TR2: Integrated Transport:

(iii) Supporting the provision of a high-quality cycle network to encourage a modal shift away from the car

(iv) Improvements to the pedestrian environment and wider public realm to encourage integration between different modes of transport, employment areas and settlement centres

DaSA policy

None relevant

Live Well Locally Policy 3a: Walking, Wheeling, Cycling & Public Transport (Outside the Site)

(A) All major development proposals for new dwellings must meet the following criteria:

- i) **Access and Provision of Public Transport.** Be located on sites that have access to effective and convenient public transport, particularly in relation to scheduled bus routes to train stations, but also through, Demand Responsive Transport (DRT) or shuttle bus services. This must be either through proximity to existing routes or through the provision of new or extended routes, within a 400m walking distance of all properties.
- ii) **Active Travel Infrastructure.** Provide or financially contribute to the delivery of walking, wheeling and cycling (active travel) infrastructure, integrating with any applicable Local Cycling and Walking Infrastructure Plans and the East Sussex Local Transport Plan, evidenced through the submission of a Transport Assessment that:
 - a. Provides a quantitative analysis of the multi-modal trip generation of the development, considering the routing of these trips to inform further considerations about the impacts and quality of existing routes within and outside the development.
 - b. Provides qualitative analysis of the accessibility of the site for all users particularly those most vulnerable e.g. older people, young and disabled and highlight deficiencies and opportunities in surrounding walking, wheeling, and cycling infrastructure through consideration of policy and guidance provided

in CIHT 'Planning for Walking' 2015, LTN 1/20¹⁷ and Active Travel England's active travel design tools. Development should consider new guidance and tools, as issued by Active Travel England as they become available.

- c. Provides detail and justification of proposed improvements to infrastructure and any other supporting strategies which seek to enable an increase in walking, wheeling, and cycling rates for all users particularly the most vulnerable.

Facilities at bus stops and rail stations must already exist (or be provided) that enable ease of access by active travel modes, for all users, to public transport so as to create mobility hubs, including:

- a. Secure and overlooked cycle parking and facilities (including hire).
 - b. Seating provision.
 - c. Lighting.
 - d. Adequate shelter to accommodate likely demand.
 - e. Service information (including RTI).
 - f. Raised kerb and dropped kerb access at bus stops.
 - g. Appropriate signage and wayfinding.
 - h. Electric charging.
 - i. Parcel collection.
- iii) **Coastal Access.** Public access to the coast must be retained and improved where possible (e.g., through the creation of new path links). Where appropriate, the King Charles III England Coast Path National Trail must be protected, and opportunities must be taken to enhance the route (e.g., re-aligning the trail closer to the sea).

- (B) All development proposals of more than 50 homes must meet the following criteria:

- i) **High-quality Walking & Wheeling Routes.** Provide (if they do not already exist) a high-quality walking & wheeling route from the site to:

¹⁷ A local transport note (LTN), published in July 2020, that provides guidance to local authorities on delivering high quality, cycle infrastructure.

- a. a transport node (a regular public transport service which enables people to carry out daily duties such as employment and education);
- b. a primary school (if applicable); and
- c. a shop selling mostly essential goods or services which benefit the community e.g., medical services.
- d. Open green or blue space.

Reference should be made to the latest version of 'Manual for Streets' (DfT) and 'Designing for Walking' (Chartered Institution of Highways & Transportation) and Active Travel England's active travel design tools for details but, as a minimum, a route must:

- a. Be 2m wide (with limited pinch points of 1.5m due to street furniture) and localised widening to accommodate peak usage.
 - b. Step-free.
 - c. Have a smooth, even surface.
 - d. Have street lighting in line with the Institution of Lighting Professionals Towards a Dark Sky Standard.
 - e. Include appropriate crossings in compliance with standards set out in LTN 1/20 and Inclusive mobility.
 - f. Have frequent seating provision.
 - g. Have navigable features for those with visual, mobility or other limitations.
 - h. Routes incorporating 'Greenways', 'Quietways' and upgrades to existing or the provision of new Public Rights of Way (PROW) will be supported and encouraged.
- ii) **Cycle Routes to Key Destinations.** Provide off-site routes that consider compliance with LTN 1/20 and Active Travel England's active travel design tools to relevant destinations such as schools, local centres, employment centres, railway stations and the existing cycling network. All new or improved off site routes must be safe for cyclists of all abilities, ages, and mobility needs.

Alternative policy

The alternative would be to not have a new policy. Existing Local Plan policy would continue to be pertinent/carry forward:

Core Strategy policy

Policy SRM1: Towards a low carbon future

The strategy to mitigate and adapt to the impacts of climate change is to:

vii) Promoting more sustainable travel patterns in accordance with transport policy TR2, and through widespread fast broadband coverage;

Policy TR2: Integrated Transport:

(iii) Supporting the provision of a high-quality cycle network to encourage a modal shift away from the car

(iv) Improvements to the pedestrian environment and wider public realm to encourage integration between different modes of transport, employment areas and settlement centres

DaSA policy

None relevant

Live Well Locally Policy 3b: Walking, Wheeling, Cycling & Public Transport (Within the Site)

All development proposals for one new dwelling or more must meet the following criteria:

- i) **Connecting Beyond the Site.** Anticipate and respond to pedestrian and cycle 'desire lines' (the preferred route a person would take to travel from A-to-B). This may include the improvement of existing public rights of way.
- ii) **Connected Streets, Paths, and Routes.**
 - a. Use simple street patterns based on formal or more relaxed grid patterns.
 - b. Use straight or nearly straight streets to make pedestrian and cycle routes as direct as possible.
 - c. Continuous streets (with public access) along the edges of a development. Cul de sacs will not be supported where there are opportunities to create connections.
- iii) **Site Permeability.** Routes for walking, wheeling, and cycling that are shorter and more direct than the equivalent by car. This could be achieved by 'filtered permeability'.

- iv) **Walking, Wheeling & Cycling Access.** Maximise all opportunities for safe, step-free, fully accessible walking, wheeling, and cycling site access points and be greater in number than the number of access points for motor vehicles (except where additional accesses would provide no benefit to people walking, wheeling, or cycling). A motor vehicle access point with safe provision for both walking, wheeling, and cycling counts as a walking, wheeling, and cycling access point.
- v) **Safe Routes Accessible to All.** Walking, wheeling, and cycling routes which are fully accessible to all users and:
 - a. Prioritise safety by being overlooked wherever possible and be adequately lit at night in accordance with LTN 1/20 and Active Travel England's active travel design tools.
 - b. Provide frequent benches along all pedestrian routes to help those with mobility difficulties walk more easily between places.
 - c. Provide navigable features for those with visual, mobility or other limitations.
- vi) **Through Traffic.** Site accesses arranged to prevent private vehicle drivers from using the site as a shortcut while undertaking a longer journey. This is best achieved through filtered permeability, or by ensuring all general traffic accesses are taken from the same main road.
- vii) **Safety At Junctions.** All new or improved on-site junctions (including the site access) LTN 1/20 compliant, adhering to Active Travel England's active travel design tools and designed in line with the movement hierarchy: pedestrians, followed by cyclists, public transport users and private motor vehicles.
- viii) **Crossings.** The appropriate crossing type (signalised / zebra / uncontrolled / continuous footway) provided along forecasted desire lines and compliant with standards set out in LTN 1/20, Inclusive Mobility and Active Travel England's active travel design tools.
- ix) **Shared Use Routes.** Protected cycle ways provided along busy streets. Shared use routes (i.e., a path or surface which is available for use by both pedestrians and cyclists) avoided along all new or improved streets with the site, unless they fit in the limited acceptable situations listed in LTN 1/20.

- x) **Future Expansion.** Enable and propose the adoption of walking, wheeling, and cycling routes up to the site boundary to provide direct connections to existing or future development where sites are either anticipated, planned, proposed, or allocated through the local plan.

- xi) **Shared Mobility.** Integrate provision of infrastructure for Demand Responsive Transport, car clubs and car shares as well as Park and Ride schemes, if introduced.

- xii) **Zero Emission Vehicles.** Integrate provision of infrastructure for rapidly advancing electric car and other zero emission technology.

Alternative policy

The alternative would be to not have a new policy. Existing Local Plan policy would continue to be pertinent/carry forward:

Core Strategy policy

Policy SRM1: Towards a low carbon future

The strategy to mitigate and adapt to the impacts of climate change is to:

- vii) Promoting more sustainable travel patterns in accordance with transport policy TR2, and through widespread fast broadband coverage;

Policy TR2: Integrated Transport:

- (iii) Supporting the provision of a high-quality cycle network to encourage a modal shift away from the car
- (iv) Improvements to the pedestrian environment and wider public realm to encourage integration between different modes of transport, employment areas and settlement centres

DaSA policy

None relevant

Live Well Locally Policy 4: Distinctive Places

All development proposals for one or more new dwelling must meet the following criteria:

- i) **Response To Site, Character & Landscape Context.** Demonstrate a clear understanding of the context and landscape character (including townscape) of the site and beyond. New development must conserve, enhance, and draw inspiration from this context & character in either a traditional or contemporary style. The use of standard building or house types that take no account of local character, bad imitation of traditional design or simply replicate generic or mediocre design in the locality will not be acceptable.
- ii) **Design Concept.** Be visually attractive and be informed by a clear rationale and strong design concept developed in response to an understanding of the context and landscape character (including townscape). The design concept must also inform a consistent choice of high-quality materials, finishes, detailing and landscape design. Generally, unprepossessing late twentieth century and twenty-first century development in the area should not be used as precedents for material and finishes choices in new development.
- iii) **High Weald National Landscape.** All development within or affecting the setting of the High Weald National Landscape shall conserve and enhance its distinctive landscape character, ecological features, settlement pattern and scenic beauty, having particular regard to the impacts on its character components, as set out in relevant policies in this plan, the latest version of the High Weald National Landscape Management Plan and the High Weald AONB Design Guide and Colour Study.
- iv) **Material Banks for Future Development.** Building materials are valuable resources to be conserved and reused. All development must incorporate design for disassembly principles, allowing for the efficient removal and recovery of materials when a building is no longer needed.
- v) **Bioregional Design.** All development must be produced in a way that suits the local area and its resources. We strongly encourage the use of low carbon materials, such as local and certified well-managed wood, for building structures, cladding and external works.

- vi) **Existing Assets.** Use existing assets as anchor features, such as mature trees and capitalise on other existing features such as key views on or beyond a site.

- iv) **Futureproofing and Safeguarding.** Ensure that land is reused/used efficiently, effectively, and must not prejudice existing and future development and connectivity to and from adjoining sites. Where such potential may exist, development must progress within a comprehensive design masterplan framework or enable a co-ordinated approach to be adopted towards the development of adjoining sites in the future.

- v) **Stewardship.** Demonstrate how they will achieve long-term stewardship of places (streets and spaces), community assets and green infrastructure by producing a Stewardship Plan that;
 - a. includes a clear management plan that sets out the vision, objectives, standards, and actions for the delivery and maintenance of places, community assets and green infrastructure, and how they will contribute to the social, economic, and environmental well-being of the community.
 - b. includes a clear participation strategy that sets out how the community will be involved in the design and management of places, community assets and green infrastructure, including the use of participatory methods, co-design, co-production, and co-management.

The Council will support proposals that adopt community stewardship models of governance, such as informal community management groups, neighbourhood planning groups, community management of public spaces, community management of buildings and facilities, community management of local energy networks, community land trusts and community housing such as cooperatives and co-housing, that give the community a key role and stake in the ownership and management of community assets and green infrastructure. The Council will also support proposals that reinvest the surplus generated by community assets and green infrastructure into the community, such as through community funds, grants, or dividends.

- vii) **Residential Assessment Frameworks.** All residential development must address the 12 considerations of “Building for a Healthy Life”, and its companion

'Streets for a Healthy Life', written in partnership with Homes England, NHS England, and NHS Improvement.

- viii) **All Development Assessment Framework.** All development must address the ten principles of "Active Design," as published by Sport England and supported by Public Health England.

Live Well Policy 5: Built Form

- (A) All development proposals for one or more new dwellings must meet the following criteria:
- i) **Landscape Strategy.** The landscape strategy must help determine the capacity of the site and hence the appropriate developable area for the development. All layout or landscape plans for multiple unit or large building developments must have accurate contour plans and information about surface water flows. Single dwelling proposals must have levels on the site and contours for the site context clearly shown on relevant plans.
 - ii) **Orientation.** Provide evidence of how the orientation of buildings and streets has taken account of:
 - a. What is locally characteristic; (through an analysis of the existing site, context and landscape character, including townscape).
 - b. Microclimate.
 - c. Opportunities to maximise passive solar gain and roof-mounted energy collection, while ensuring against excessive internal heat gains in warmer seasons. New buildings and streets must prioritise southern exposure for passive heat gain, while minimising east-west orientation, (unless there are overriding reasons concerning context and landscape character).
 - d. Key views and vistas.
 - e. Topography and significant existing features.
 - f. The need for natural surveillance.
 - iv) **Legibility and Street Hierarchy.** Promote good legibility in the following ways:
 - a. Clear route hierarchy.
 - b. Strong and logical building layout and massing.

- c. Consistent choice of materials.
 - d. Use local landmarks and key views.
 - e. Retention of key distinctive features.
- v) **Perimeter Blocks.** Aim to respect existing or achieve new perimeter block layouts unless not feasible or not locally characteristic. Utilise cohesive building compositions that define appropriate building lines and create consistent, visually harmonious street edges to enhance the pedestrian experience.

Non-residential developments that are delivered as a series of individual parcels with their own surface level car parks set back from the street will not be supported.

- vi) **Active Frontage.** Streets must have active frontages with dual aspect homes on street corners with windows serving habitable rooms. Street corners with blank or largely blank sided buildings and/or driveways, street edges with garages or back garden spaces enclosed by long stretches of fencing or wall must be avoided. Windows must be clear along the ground floor of non-residential buildings (avoid obscure windows).
- vii) **Transitions.** Transitions between existing and new development must be sensitive and well considered so that building heights, typologies and tenures sit comfortably next to each other.
- viii) **Edges.** New settlement edges must look both ways, responding to the countryside while also knitting into the existing fabric of a settlement. Where possible, new development should address the countryside directly and not turn its back onto it, unless this is not locally characteristic.
- (B) All major housing developments must meet the following criteria:
- (ix) **Form Factor.** 50% of dwellings have a form factor of 1.7 or less to ensure that housing is designed to be energy-efficient and environmentally sustainable.

Live Well Locally Policy 6: Streets for All

- (A) All development proposals must meet the following criteria:
- i) **Design Speed of New Streets.** New or improved streets designed (no centre line, horizontal deflection, narrow width) and signed for vehicles to travel at a max speed of 20mph.
 - ii) **Shared Streets.** Street space shared fairly between pedestrians, cyclists, and motor vehicles (See Manual for Streets User hierarchy) and be inclusively designed so that people with visual, mobility or other limitations will be able to use the street confidently and safely. Incorporate a variety of street furniture (e.g., benches, places to sit, rest and interact), sensitively and appropriately located at regular intervals, along with good signage and wayfinding that is accessible to all to encourage walking and prioritise vulnerable users.

They must be adopted, managed, and resourced as public open space rather than as public highway with its conventional emphasis upon motorised traffic movement.

- iii) **Dementia Friendly District.** Streets and spaces designed to adhere to best practice 'designing for dementia' principles, to contribute towards making Rother's outdoor environments more age and dementia-friendly.
- iv) **Use Buildings to Define Streets & Spaces.** Well defined new streets and spaces enclosed by buildings or landscape elements, particularly street trees, and boundary structures.
- v) **Tree Lined Streets.** For cooling and carbon capture, with appropriate native and climate resilient trees that are in the public realm rather than on private property, have a wider canopy form for cooling and shade, have sufficient space to grow above and below ground and have long term management arrangements in place.
- vi) **Animated Streets.** Create animated streets, incorporating public art, cultural installations, street furniture and heritage features to enrich the visual appeal and cultural identity of public spaces.

- vii) **Landscaping.** Provide landscape layers that add sensory richness to a place – visual, scent and sound and help settle parked cars into the street. With frontage parking, the space equivalent to a parking space must be given over to green relief (for instance every four bays). Areas identified as suitable for growing fruit and vegetables within the curtilage of the street or public courtyards will be supported.
- viii) **Sustainable Drainage Systems.** Incorporate sustainable drainage systems (SuDS), such as swales, rain gardens or ditches as well as infiltration zones such as grass verges, into streets.
- ix) **Services.** Incorporate all underground surfaces into shared trenches with common ducting where possible. This must be considered at an early stage in the design layout and be designed to be compatible with Green Infrastructure and SuDS. Landscape elements such as street trees must not be prejudiced by lighting columns or underground ducting.
- x) **Reducing Street Clutter.** Streamline the placement of signage, street furniture, and other elements in public spaces to reduce street clutter. Benches and bins must be consistent with the design concept for the site/development.
- xi) **Healthy Streets.** Address the ten ‘Healthy Streets’ indicators of the “Healthy Streets Toolkit,” as endorsed by the East Sussex LTP4.
- xii) **Historic Streets.** Address the guidance in “Streets for All: Advice for Highway and Public Realm Works in Historic Places,” as published by Historic England, where relevant to the context.
- (B) All development of more than 150 dwellings or 1500sqm of commercial floorspace) must meet the following criteria:
- xiii) **Meaningful Variation Between Street Types.** Use a street hierarchy to help people find their way around a place. For instance, principal streets can be made different to more minor streets using different spatial

characteristics, building typologies, building to street relationships, landscape strategies and boundary and surface treatments.

Live Well Locally Policy 7: Multimodal Parking

All development proposals must meet the following criteria:

- i. **Cycle Parking.** Provide cycle parking ensuring all users feel safe, consistent with the overall design concept for the site/development and provided in line with Table 11.1/Table 11.2 of LTN 1/20 (inc. requirement of 5% of spaces to be accessible for larger cycles).
 - a. **Residential Cycle Parking.** Secure, covered, well-lit cycle storage for all new dwellings, including flats, must be located close to people's front doors so that cycles are as convenient to choose as a car for short trips and easily accessible from the dwelling.
 - b. **Non-residential cycle Parking.** Secure, overlooked, well-maintained, well-lit cycle parking must be located closer to the entrance of schools, commercial, leisure + community facilities than car parking spaces or car drop off bays, except for blue badge spaces. Facilities must be suitable for a range of cycle types including electric bikes, cargo bikes, tandems, and tricycles. Where appropriate, secure external cycle parking must be provided where off-street parking does not exist.
- ii. **Car Parking Layout.** The proposed street design and parking management strategy demonstrably and physically discourage the blockage of footways, crossing points, sightlines, and cycle routes on and off site by indiscriminate and obstructive car parking.
- iii. **On Street Parking.**
 - a. Well integrated car parking design, with good landscape treatment avoiding a public realm dominated by cars, hard standing, too many materials and associated clutter. A parking strategy must inform the design layout from an early stage.
 - b. Landscape-led design with layout and materials responding to the landscape character of the place.

- c. Maximise opportunities for enhancing green infrastructure and sustainable drainage.
 - d. Minimise opportunities for anti-social car parking on pavements and green spaces.
 - e. Be safe, conveniently located for the dwellings they serve, overlooked and accessible for all.
- iv. **In Curtilage Garages.** Use limited on multi home developments. Repeated garages taking a large proportion of the ground floor frontage of a street avoided as this leads to a lack of fenestration and street animation. Garages which are designed to accommodate bicycles should meet minimum dimensions to ensure they can be accessed without the need to remove vehicles.
- v. **In Curtilage Parking.**
- a. Where in-curtilage parking for individual houses is to be used, car spaces must be to the side of the main building and at least 5.5m behind the building's front edge to prevent the vehicle protruding.
 - b. In-curtilage parking in front of narrow-fronted properties should be avoided if better alternatives are available and where unavoidable must be restricted to two adjoining properties to reduce the visual impact of parked vehicles on the street scene.
 - c. Drive widths must be at least 3.2m when also serving as the main pathway to the property.
 - d. Private car spaces and drives visible from the street should be surfaced in small unit permeable pavers, or other materials (such as gravel) which will allow sustainable drainage, raising the environmental quality of the scheme.
- vi. **Car Parking Courts.** Rear car parking courts serving houses must be avoided where possible.
- vii. **Allocations.** Where possible, street, and shared court car parking should not be allocated to individual properties as this is a much more efficient use of space.
- viii. **Parking Squares.** Parking squares designed with robust materials to function as attractive public spaces which also accommodate parked cars. This can be

achieved with generous and appropriate green infrastructure, surfaces other than tarmac and appropriate street furniture. Parking squares should aspire to also be attractive areas of multi-functional public space, providing opportunities for communal activities such as market stalls, ceremonies, events, the annual Christmas tree.

- ix. **Communal 'Remote' Car Parking.**
 - a. Car parking can be partly or wholly located in well-designed communal blocks, such as car barns or car ports, preferably still with some natural surveillance.
 - b. These communal blocks must be located within a short and convenient walking distance of the buildings it serves.
 - c. Where 'remote' car solutions are used, streets and spaces closer to homes must be designed to make uncontrolled car parking less easy, to discourage antisocial car parking behaviour.
 - d. Provision for disabled drivers, activities such as dropping off passengers and shopping and access for emergency vehicles, waste collection, bulky deliveries and removals to homes will still need to be fully considered.

- x. **Green Infrastructure.** Most car parking solutions will require generous green infrastructure, such as trees or rain gardens, to mitigate the visual impacts, maximise opportunities to enhance wildlife and provide shade. Too many materials, colour changes and small areas of kerbing and planting leads to an over busy result. Simple palettes and layouts are generally encouraged.

- xi. **Rural Car Parking.**
 - a. The design of car parks in the countryside or on the settlement edge must ensure they integrate into the surrounding landscape and avoid unwelcome visual impacts and suburban character.
 - b. The layout, scale, materials, and mitigation measures using green infrastructure must be landscape-led and aim to enhance local character.
 - c. Over-large car parks should be avoided where possible as they will conflict with local character and their visual impacts are more difficult to mitigate.
 - d. Simple materials, based on what is locally characteristic, an absence of highway elements such as kerbs and clutter and locally appropriate planting represent the best approach in most locations.

- ix) **Other Parking.** Provide safe, secure parking to support the use of powered two-wheelers. Facilities, with an electricity supply, must be suitable for a range of types including mopeds, scooters, and motorbikes. For specialist accommodation for older people and for people with disabilities, secure storage space under cover, with an electricity supply, is also required for powered wheelchairs or mobility scooters.

Green to the Core

Supporting text

- 9.6 Topics that these policies include are the levels of energy use for new development, how renewable energy will be expected to meet the energy need, and how whole life carbon emissions (emissions associated with building construction) will be taken into account. Building Regulations provide a thorough baseline position for Local Plan policy, which will follow the Energy Hierarchy by favouring a ‘fabric first’ approach. Minimum targets, informed by the LP evidence base including a best practice review and technical modelling, for operational and embodied carbon emissions will drive improvements in building construction and fabric.

Proposed Green to the Core Policy 1: Net Zero Building Standards

A. Operational Energy

All new development proposals must demonstrate, through an energy statement, how the following building performance standards for operational energy use and carbon emissions will be met using the energy hierarchy in the design, construction, and operation phases. This includes prioritising fabric first and orientation in order to minimise energy demand for heating, lighting and cooling; and considering opportunities to provide solar PV and energy storage and connecting with district heat networks, where possible, and decentralised electricity networks.

- (i) Residential development should achieve:

- a) LETI¹⁸ Total Energy Use Intensity (TEUI) Target for Operational Energy of 35 kWh/m²/year (GIA)
- b) For new buildings, a 4-star Home Quality Mark (HQM) score; or for conversions to residential development, a BREEAM 'Excellent' standard as minimum.
- c) A maximum space heating demand for new buildings (small scale housing) of 15 kWh/m² per year.

If LETI, Home Quality Mark or BREEAM is updated or replaced during the plan period the equivalent replacement requirements will be applied.

To demonstrate compliance, a BRE Home Quality Mark post-construction assessment or similar must be undertaken at practical completion.

(ii) Non-residential development (including building conversions) should achieve:

- a) A LETI TEUI Target for Operational Energy of:
 - For offices - 55 kWh/m²/year (GIA);
 - For light industrial - 65 kWh/m²/year (GIA); and
 - For industrial units (including warehouses), a feasibility statement to evidence a practicable TEUI Target.
- b) A BREEAM 'Outstanding' standard as a minimum.

B. Embodied Carbon

- (i) All residential development must achieve a LETI C rating for embodied carbon emissions, equating to 600 kgCO₂/m² upfront embodied carbon and 970 kgCO₂/m² total embodied carbon.

From 1 January 2030 a LETI A rating must be achieved, equating to 300 kgCO₂/m² upfront embodied carbon and 450 kgCO₂/m² total embodied carbon.

¹⁸ The Low Energy Transformation Initiative established in 2017 to support the transition to net zero, originally in London.

- (ii) All office development should achieve a LETI C rating for office development, equating to 600 kgCO₂/m² upfront embodied carbon and 970 kgCO₂/m² total embodied carbon.

From 1 January 2030, a LETI A rating must be achieved, equating to 350 kgCO₂/m² upfront embodied carbon and 530 kgCO₂/m² total embodied carbon.

C. Whole Life Carbon

Development proposals of more than 10 dwellings or 1,000 sqm of non-residential floorspace, must demonstrate that whole life carbon analysis has been applied in designing the scheme, including optimising operational and embodied carbon and energy, as well as integrating circular economy principles (following current LETI and RIBA guidance). Opportunities for reuse should be set through the provision of a whole life carbon statement.

Proposed Green to the Core Policy 2: Net Zero Retrofit Standards

Significant weight will be given to proposals which result in considerable improvements to the energy efficiency, reduction of carbon emissions and/or general suitability, condition and longevity of existing buildings will be supported. All proposed retrofit schemes must:

- (i) Provide an Energy Statement which aligns with the six principles for best practice in LETI's Climate Emergency Retrofit Guide.
- (ii) Meet BREEAM Domestic Refurbishment Excellent standard, as a minimum, when delivering 10 dwellings or more.

In relation to statutorily and non-statutorily protected historic buildings or Conservation Areas, Policy HER1 will apply, guided by Historic England advice on climate change and historic building adaptation.

Proposed Green to the Core Policy 3: Construction Materials and Waste

Development proposals will be required to demonstrate how they have implemented the principles and requirements set out below.

- (i) Reuse land and buildings wherever feasible and consistent with maintaining and enhancing local character and distinctiveness.
- (ii) Reuse and recycle materials that arise through demolition and refurbishment, including the reuse of excavated soil and hardcore within the site. When appropriate, undertake a BRE pre-demolition audit, or similar, to determine products and materials for re-use prior to demolition or major retrofit.
- (iii) Implement the Design for Disassembly approach on all schemes over ten dwellings or 1,000 sqm of non-residential floorspace, understanding the life-span of every building from the design stage and making provision for the re-use of its parts.
- (iv) Space is provided and appropriately designed to foster greater levels of recycling of domestic and commercial waste.

Proposed Green to the Core Policy 4: Water Efficiency

All new dwellings must be designed to achieve the Optional Technical Housing Standard of no more than 110 litres per person per day for water efficiency as described in Building Regulation G2.

The extent to which a proposal can demonstrate being water efficient will be a factor weighing in favour of a proposed development (where appropriate when accounting for design, heritage and safety considerations).

New development, including residential extensions and alterations, should minimise its impact on water resources. As such, rainwater and/or grey-water storage and recycling measures, green roofs and walls, and other water efficiency measures are encouraged.

Proposed Green to the Core Policy 5: Heat Networks

- A. The Council will support district heat networks where feasible and where one exists, new development will be expected to connect to it.
- B. All proposals of greater than 10 dwellings or 1,000 sqm of non-residential floorspace in Bexhill-on-Sea and all non-residential floorspace of greater than

1,000sqm in Rye Harbour are required to make developer contributions towards the establishment of district heat networks.

Proposed Green to the Core Policy 6: Renewable and Low Carbon Energy

- (A) Proposals for renewable and low energy generation will be supported and encouraged, subject to other Local Plan policies, where:
- i) They will not result in significant adverse impacts on landscape character that cannot be satisfactorily mitigated, including the High Weald National Landscape; trees, woodland and hedgerows; agricultural land use and local heritage,
 - ii) They will avoid unacceptable visual impact from the effect of glint and glare on the landscape, on neighbouring uses and aircraft safety.
 - iii) They have a direct benefit to the local community.
 - iv) Proposals for community led initiatives, including those proposed through Neighbourhood Planning should be supported.

In addition, the following criteria will be used to assess specific generation types:

Solar

- (B) Proposals for roof-mounted solar energy supply infrastructure will be supported and encouraged wherever possible, subject to other policies and Policy HER1 (Heritage Management) in particular. Stand-alone ground mounted installations will be supported, subject to other policies, on previously developed land or where evidence of community support can be demonstrated.

Wind

- (C) Proposals for wind energy supply infrastructure will be supported, subject to other policies, where they are in a 'broad location' identified on the Policies Map, or in a made Neighbourhood Plan, and where evidence of community support can be demonstrated.

Energy Storage

- (D) Proposals for energy storage will be supported. Subject to other policies, where it is co-located with an existing or proposed renewable energy development or can be shown to alleviate grid constraints.

Current local plan policy

Core Strategy

Policy SRM1: Towards a low carbon future

The strategy to mitigate and adapt to the impacts of climate change is to:

(ii) Ensure that all developments meet prevailing energy efficiency standards, and encourage them to meet higher standards and pursue low carbon or renewable energy generation, where practicable, by fully recognising related costs in assessing viability and developer contributions;

(iii) Support stand-alone renewable and low carbon energy generation schemes, particularly those utilising solar, biomass and wind energy technologies, that:

(a) do not have a significant adverse impact on local amenities, ecological and heritage assets or landscape character, and

(b) in respect of locations in or adjacent to the High Weald AONB and other sensitive landscapes, are generally small in scale;

(iv) Achieve high levels of energy performance on the strategic mixed use developments to the north east of Bexhill, including by Combined Heat and Power (CHP) and/or wind energy generation.

DaSA

Policy DRM2: Renewable Energy Developments

Proposals for low carbon and renewable energy schemes, including community-led initiatives, will be supported where they accord with Core Strategy policy SRM1, where applicable, and with other policies in this Plan, including DEN1, DEN2,

DEN3, DEN4 and DEN7. Proposals for large-scale stand-alone wind turbine schemes would be incompatible with the objectives of environmental designations across the district, although smaller schemes will be considered in accordance with the paragraph above.

10 Sustainability Appraisal

Purpose of the Sustainability Appraisal

- 10.1 The purpose of the sustainability appraisal process is to test any emerging policy options or strategies against the sustainability criteria that have been set and agreed in the SA framework of the SA/SEA Scoping Report. This framework pulls together 20 sustainability appraisal objectives that have been devised to cover the key areas of sustainability that are required to be assessed under planning legislation, and these generally match the Council’s key issues and evidence base. This forms a standard framework that policy options can be assessed in a consistent way and the outcomes will determine what the most sustainable options are for the Council.
- 10.2 A detailed analysis and summary of the sustainability appraisal of the development options can be found in Appendix 1 and 2 of this report. This provides an assessment of how each option performs (e.g. negative, neutral, positive) impacts against each of the 20 sustainability appraisal objectives, using the following annotations and scoring:

++	Strong positive impact (+2 points)	+	Positive impact (+1 points)	o	Neutral impact (0 points) – balanced impact or no/questionable impact	-	Negative impact (-1 points)	--	Strong negative impact (-2 points)
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Outcome of the Sustainability Appraisal

- 10.3 By undertaking the sustainability appraisal of each option in isolation, it is possible to see the individual merits of each option and allows a comparison with previous Local Plan policies when one or more exists. The appraisal has shown that all of the new Green to the Core policies have a positive impact on the sustainable objectives, and where relevant, are more sustainable than the earlier Local Plan policies regarding the same or similar topics. As all Green to the Core policies have been written expressly to improve the sustainability of new development in the district, it is unsurprising that the assessment of the new policies has not indicated

any negative impacts. All sustainability objectives are either impacted in a positive manner or receive no impact due to no obvious relevance. A justification for the assessment of each objective is given in the commentary column.

10.4 The options that have scored the highest are summarised as follows:

Policy number	Option	Comments and recommendation
1. Net Zero Development Building Standards	A standalone policy with sections on operational energy, embodied carbon and whole life carbon to support the raise in construction standards to net zero carbon emissions.	Core Strategy policy SRM1: Towards a Low Carbon Future requires for developments over 10 units to provide an energy strategy, ensures all developments meet the prevailing energy standards and pursue low carbon or renewable energy generation and when extending buildings to apply the prevailing standards to the whole building. DaSA policy DRM3: Energy Requirements lowers the requirement by changing the minimum number of dwellings from 10 to 100 dwellings. New policy 'Net Zero Development Building Standards' introduces standards for operational energy, embodied carbon and whole life carbon and is the preferred option in place of the existing policies. The SA indicates that the policy will have a positive impact on all relevant objectives.
2. Net Zero Retrofit Standards	A standalone policy with recommendations for all retrofit schemes to meet certain standards.	Core Strategy policy SRM1: Towards a Low Carbon Future encourages applications for extensions to apply the prevailing efficiency standards to the entire building. The new policy gives significant weight to proposals which result in considerable improvements to the energy efficiency of the building and requires <i>all</i> schemes to provide an energy statement as well as meeting BREEAM Excellent for developments over 10 dwellings. The new policy will have a positive impact on the sustainability objectives as demonstrate in the SA appraisal table.
3. Construction Materials and Waste	Standalone policy with several criteria recommending	This is a new policy topic, the only existing related policy is in the ESCC Waste and Minerals Plan 201-

Policy number	Option	Comments and recommendation
	ways to reduce construction site waste.	The policy has a positive impact on our objectives and does not replace or update existing Rother policy.
4. Water Efficiency	A standalone policy to promote efficient water use in new development	This policy carries forward DaSA Policy DRM1: Water efficiency with additional recommendations for new development to consider implementation of storage and recycling of rainwater and grey water. The policy has a positive impact on the sustainability objectives and expands on the existing policy.
5. Heat Networks	A standalone policy in support of heat networks.	DaSA policies DRM2: Renewable Energy Developments and DRM3: Energy Requirements make recommendations for renewable and low carbon energies, however this policy is recommended as it expressly supports heat networks, which earlier policies have not done.
6. Renewable and Low Carbon Energy	A standalone policy to support renewable and low carbon energy generation	This policy places more emphasis on renewable energy generation than previous policies (DRM2, DRM3), giving specific requirements for solar, wind and energy storage, whereas the earlier policies The policy has a positive impact on the sustainability objectives and the preferred option is for it to replace the existing policies.

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