

Rother District Council Local Plan Habitats Regulations Assessment

Regulation 18 Habitats Regulations Assessment

Rother District Council

March 2024

Quality information

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1. Introduction

Background

- 1.1 AECOM has been appointed by Rother District Council (the Council) to undertake a Habitats Regulations Assessment (HRA) of the emerging Rother Local Plan (RLP). The first stage of this process is an initial Test of Likely Significant Effects (aka HRA Screening) on the identified (those sites previously allocated and with planning permission) and potential sites for housing and commercial development and associated proposed policies.
- 1.2 The objective of the screening is to identify any aspects of the Plan that may result in Likely Significant Effects (LSEs) on the integrity of the National Site Network (NSN), either in isolation or in combination with other plans and projects. The NSN is comprised of Habitats Sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and, as a matter of Government policy, Ramsar sites). Habitats Sites were previously known as European sites.
- 1.3 The planning period for the emerging Draft (Regulation 18) RLP is 2020 to 2040; there is thus some overlap with the 2014 Core Strategy and its planning period of 2011 to 2028.
- 1.4 A summary of the Habitats Sites (previously “European Sites”) considered within the context of this HRA screening are Dungeness (SAC), Dungeness, Romney Marsh and Rye Bay (SPA and Ramsar) (together known as the Dungeness Complex), Hastings Cliffs (SAC), Pevensey Levels (SAC and Ramsar), Ashdown Forest (SAC and SPA), and Lewes Downs SAC. Recreational disturbance, water quality (and flows) and air quality are the main development-related impact pathways that apply to these designations.

Legislation

- 1.5 The UK left the European Union (EU) on 31 January 2020 under the terms set out in the European Union (Withdrawal Agreement) Act 2020 (“the Withdrawal Act”). While the UK is no longer a member of the EU, a requirement for Habitats Regulations Assessment will continue as set out in the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019¹.
- 1.6 The HRA process applies the ‘Precautionary Principle’² to Habitats sites. Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the European site(s) in question. To ascertain whether or not site integrity will be affected, an Appropriate Assessment should be undertaken of the Plan or project in question. Figure 1 below sets out the legislative basis for Appropriate Assessment.
- 1.7 Plans and projects that are associated with potential adverse impacts on European sites may still be permitted if there are no reasonable alternatives and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network.

¹ These don't replace the 2017 Regulations but are just another set of amendments.

² The Precautionary Principle, which is referenced in Article 191 of the Treaty on the Functioning of the European Union, has been defined by the United Nations Educational, Scientific and Cultural Organisation (UNESCO, 2005) as: “*When human activities may lead to morally unacceptable harm [to the environment] that is scientifically plausible but uncertain, actions shall be taken to avoid or diminish that harm. The judgement of plausibility should be grounded in scientific analysis*”.

Conservation of Habitats and Species Regulations 2017 (as amended)

The Regulations state that:

“A competent authority, before deciding to ... give any consent, permission or other authorisation for, a plan or project which – (a) is likely to have a significant effect on a European site ... (either alone or in combination with other plans or project)... must make an appropriate assessment of the implications of the plan or project in view of the site’s conservation objectives... The competent authority may agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site”.

Figure 1: The legislative basis for Appropriate Assessment

- 1.8 Over time the phrase ‘Habitats Regulations Assessment’ (HRA) has come into wide currency to describe the overall process set out in the Regulations from screening through to IROPI. This has arisen in order to distinguish the process from the individual stage described in the law as an ‘Appropriate Assessment’.
- 1.9 In spring 2018 the ‘Sweetman’ European Court of Justice ruling³ clarified that ‘mitigation’ (i.e., measures that are specifically introduced to avoid or reduce a harmful effect on a Habitats site that would otherwise arise) should **not** be taken into account when forming a view on Likely Significant Effects. Mitigation should instead only be considered at the Appropriate Assessment stage. This HRA is cognisant of that ruling.

Habitats site scope of the project

- 1.10 There is no pre-defined guidance that dictates the physical scope of an HRA of a Plan document. Current guidance suggests that the following Habitats Sites should be included in the scope of an HRA assessment:
 - All Habitats Sites within the boundary of the Rother District; and,
 - Habitats Sites located outside of the District boundary shown to be linked to development in the Rother Local Plan through a known ‘pathway’ (discussed below).
- 1.11 Generally, it is uncommon for development plans to be deemed to have significant impacts on Habitats Sites situated more than 10km from areas of growth. For example, most core recreational catchments (except for some coastal sites) are under 10km in size and the average vehicle commuting distance of a UK resident is approx. 10km. However, there are exceptions and it should be noted that the presence of a conceivable impact pathway linking a Plan to a Habitats Site does not mean that Likely Significant Effects (LSEs) will occur.
- 1.12 In particular, development impacts can extend beyond 10km, particularly where hydrological pathways and surface water catchments are involved, which is why the source-pathway-receptor concept is also used to help determine whether there are potential pathways connecting development to Habitats Sites. This takes site-specific sensitivities into account, including issues such as nutrient neutrality or water levels, quantity and flow.
- 1.13 Briefly defined, impact pathways are routes by which the implementation of a policy within a Local Plan document can lead to an effect upon a Habitats Site. An example of this would be new residential development resulting in an increased population and thus increased recreational pressure, which could affect Habitats Sites through, for example, disturbance of ground-nesting birds. Guidance from the Ministry of Housing, Communities and Local Government (MHCLG, now the Department for Levelling Up, Housing and Communities (DLUHC)) states that the HRA should be ‘*proportionate to the geographical scope of the*

³ People Over Wind and Sweetman v Coillte Teoranta (C-323/17)

[plan policy]' and that 'an AA need not be done in any more detail, or using more resources, than is useful for its purpose' (MHCLG, 2006, p.6).

- 1.14 This basic principle has also been reflected in court rulings. The Court of Appeal⁴ has ruled that provided the Council (competent authority) was duly satisfied that proposed mitigation could be 'achieved in practice' to satisfy that the proposed development would have no adverse effect, then this would suffice. This ruling has since been applied to planning permissions (rather than a Plan level document)⁵. In this case the High Court ruled that for 'a multistage process, so long as there is sufficient information at any particular stage to enable the authority to be satisfied that the proposed mitigation can be achieved in practice it is not necessary for all matters concerning mitigation to be fully resolved before a decision maker is able to conclude that a development will satisfy the requirements of Reg 61 of the Habitats Regulations'.
- 1.15 Habitats Sites within 10km and/or those judged to have impact pathways present, are discussed this HRA:
- Dungeness SAC (within and to the east of the Rother district boundary),
 - Dungeness, Romney Marsh and Rye Bay SPA and Ramsar sites (within and to the east of the Rother district boundary),
 - Hastings Cliffs SAC (Adjacent to the south of the Rother district boundary),
 - Pevensey Levels SAC and Pevensey Levels Ramsar (within and to the west of the Rother district boundary),
 - Ashdown Forest SAC (approximately 15 km to the west of the Rother district boundary), and
 - Lewes Downs SAC (approximately 22 km to the west of the Rother district boundary).
- 1.16 The distribution of the above Habitats Sites in relation to Rother District is shown in Figure 1Figure 3. An introduction to the qualifying features (species and habitats), Conservation Objectives, and threats and pressures to the integrity of these Habitats Sites are set out in Chapter3.
- 1.17 In order to fully inform the screening for LSEs stage, several studies and online information databases have been consulted. These include:
- HRA of the adopted Development and Site Allocations Plan (DaSA), adopted 2019, and emerging Neighbourhood Plans;
 - The Dungeness Sustainable Access and Recreation Management Strategy (SARMS);
 - Future development proposed (and, where available, HRAs) for the adjoining authorities of Hastings, Folkestone and Hythe, Ashford, Tunbridge Wells, and Wealden as well as other relevant authorities of Sevenoaks, Tandridge, Crawley, Horsham, Adur, Brighton and Hove, and Lewes (in relation to previous considerations on impacts on the Ashdown Forest);
 - Road traffic statistics from the Department for Transport (<https://roadtraffic.dft.gov.uk>);
 - Journey-to-work data from the Population Census 2011 or 2021 (<https://www.nomisweb.co.uk/census/2011/WU03UK>);

⁴No Adastral New Town Ltd (NANT) v Suffolk Coastal District Council Court of Appeal, 17th February 2015

⁵High Court case of R (Devon Wildlife Trust) v Teignbridge District Council, 28 July 2015

- Surface water catchment GIS Shapefiles for the Pevensey Levels hydrological catchment;
- Site Improvement Plans and Supplementary Conservation Advice Notes for relevant Habitats Sites published by Natural England;
- The UK Air Pollution Information System (www.apis.ac.uk); and
- Multi Agency Geographic Information for the Countryside (MAGIC) and its links to SSSI citations and the JNCC website (www.magic.gov.uk).

Quality Assurance

- 1.18 This report was undertaken in line with AECOM's Integrated Management System (IMS). Our IMS places great emphasis on professionalism, technical excellence, quality, environmental and Health and Safety management. All staff members are committed to establishing and maintaining our certification to the international standards BS EN ISO 9001:2008 and 14001:2004 and BS OHSAS 18001:2007. In addition, our IMS requires careful selection and monitoring of the performance of all sub-consultants and contractors.
- 1.19 All AECOM Ecologists working on this project are members (at the appropriate level) of the Chartered Institute of Ecology and Environmental Management (CIEEM) and follow their code of professional conduct (CIEEM, 2019)

2. Methodology

Introduction

- 2.1 The HRA has been carried out with reference to the general EC guidance on HRA⁶ and general guidance on HRA published by government in July 2019 and February 2021⁷. AECOM has also been mindful of the implications of European case law in 2018, notably the Holohan ruling and the People over Wind ruling, both discussed below.
- 2.2 Figure 2 below outlines the stages of HRA according to current EC guidance. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the Plan.

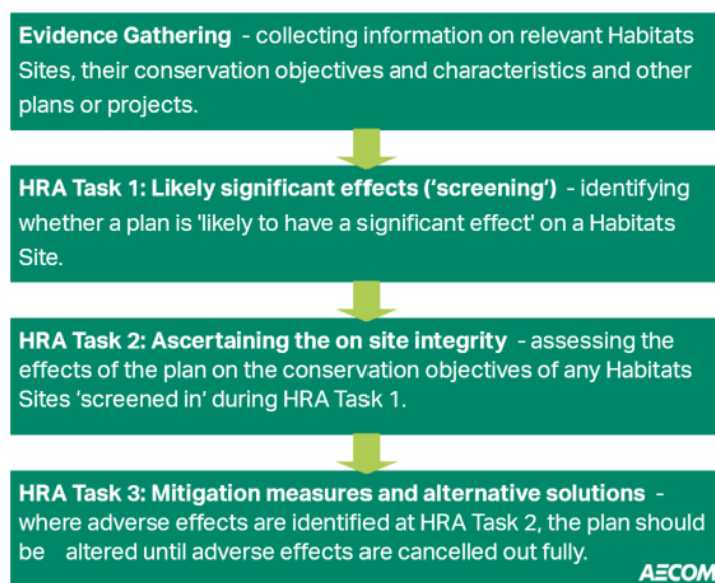


Figure 2: Four Stage Approach to Habitats Regulations Assessment. Source EC, 2001¹.

Description of HRA Tasks

HRA Task 1 – Screening for Likely Significant Effects (LSEs)

- 2.3 Following evidence gathering, the first stage of any Habitats Regulations Assessment is the screening for Likely Significant Effects (LSEs), essentially a high-level assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:

"Is the project, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon Habitats sites?"

- 2.4 The objective is to filter out those Plans and projects that can, without any detailed appraisal, be concluded to be unlikely to result in any impacts upon Habitats Sites, usually because there is no mechanism for a negative interaction. This stage is undertaken in Chapter 5 of this report and in Appendix A and B.

⁶ European Commission (2021): Assessment of plans and projects significantly affecting Natura 2000 Sites: Methodological Guidance on the Provisions of Article 6(3) and 6(4) of the Habitats Directive.

⁷ <https://www.gov.uk/guidance/appropriate-assessment> <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>

HRA Task 2 – Appropriate Assessment (AA)

- 2.5 Where a conclusion of 'no Likely Significant Effects (LSEs)' cannot be drawn, the analysis proceeds to the next stage of HRA known as Appropriate Assessment. Case law has clarified that 'Appropriate Assessment' is not a technical term. In other words, there are no particular technical analyses, or level of technical analysis, that are classified by law as belonging to Appropriate Assessment compared to the screening stage.
- 2.6 By virtue of the fact that it follows screening for LSEs, there is a clear implication that the analysis will be more detailed than undertaken at the previous stage. One of the key considerations during Appropriate Assessment is whether there is available mitigation that would entirely address the potential effect. In practice, the Appropriate Assessment would take any proposed policies or identified and potential sites that could not be dismissed following the high-level screening and assess the potential for an effect in more detail, with a view to concluding whether there would be a potential for an adverse effect on site integrity (in other words, disruption of the coherent structure and function of the Habitats Site(s)). A decision by the European Court of Justice⁸ concluded that measures intended to avoid or reduce the harmful effects of a proposed Plan or project on a Habitats Site may no longer be considered by competent authorities at the screening for LSEs stage of HRA. That ruling has been taken into account in producing this HRA.
- 2.7 Also, in 2018 the Holohan ruling⁹ was handed down by the European Court of Justice. Among other provisions paragraph 39 of the ruling states that '*As regards other habitat types or species, which are present on the site, but for which that site has not been listed, and with respect to habitat types and species located outside that site, ... typical habitats or species must be included in the appropriate assessment, if they are necessary to the conservation of the habitat types and species listed for the protected area*' [emphasis added]. Due account of this decision has been given in this HRA in relation to the Ashdown Forest SPA, which is designated for mobile ground-nesting birds (although it is to be noted that the qualifying species are not considered to be critically dependent on functionally linked habitats).

HRA Task 3 – Avoidance and Mitigation

- 2.8 Where necessary, measures are recommended for incorporation into the Plan in order to mitigate and / or avoid adverse effects on Habitats Sites. There is considerable precedent concerning the level of detail that a Local Plan document needs to contain regarding mitigation for impact pathways on Habitats Sites (e.g. regarding recreational pressure). The implication of this precedent is that it is not necessary for all measures to be fully developed prior to adoption of the Plan, but the Plan must provide an adequate policy framework within which these measures can be delivered.
- 2.9 When discussing mitigation for a Local Plan, one is concerned primarily with the policy framework to enable the delivery of such mitigation rather than the details of the mitigation measures themselves since a Local Plan document is a high-level policy document.
- 2.10 In any Local Plan, there are numerous policies for which there is a limit to the degree of assessment that is possible at the Plan level. This is because either:
- The policy in question does not contain any specifics as to what will be delivered or where, and so cannot be assessed in detail at the Plan level. In these cases, the Appropriate Assessment focusses on precautionary mitigation that can be included in the plan to ensure that whatever proposals come forward will not result in adverse effects on integrity; or
 - The nature of potential impacts (e.g. visual and noise disturbance arising from construction or loss of functionally linked habitat) are related to how the development will be designed and constructed, and therefore cannot be assessed in detail at the plan

⁸ People Over Wind and Sweetman v Coillte Teoranta (C-323/17)

⁹ Case C-461/17

level. In these instances, the Appropriate Assessment focusses on available mitigation measures, the extent to which such measures would be achievable and effective, and whether an adequate protective framework exists to ensure that the policy would not lead to an adverse effect on the integrity of any internationally designated sites.

- 2.11 In these instances, the advice of Advocate-General Kokott¹⁰ is also worth considering. She commented that: *'It would ...hardly be proper to require a greater level of detail in preceding plans [rather than planning applications] or the abolition of multi-stage planning and approval procedures so that the assessment of implications can be concentrated on one point in the procedure. Rather, adverse effects on areas of conservation must be assessed at every relevant stage of the procedure to the extent possible on the basis of the precision of the plan. This assessment is to be updated with increasing specificity in subsequent stages of the procedure'* [emphasis added].

Confirming Other Plans and Projects That May Act In Combination

- 2.12 It is a requirement of the Regulations that the effects of any land use plan being assessed are not considered in isolation but in-combination with other plans and projects that may also be affecting the Habitats site(s) in question.
- 2.13 In considering the potential for combined regional housing development to affect Habitats sites, the primary consideration is the impact of visitor numbers – i.e., recreational pressure and urbanisation.
- 2.14 When undertaking this part of the assessment it is essential to bear in mind the principal intention behind the legislation, i.e. to ensure that those projects or plans (which in themselves may have minor effects) are not simply dismissed on that basis but are evaluated for any cumulative contribution they may make to an overall significant effect. In practice, in-combination assessment is therefore of greatest relevance when proposed Planning policies would otherwise be screened out because their individual contribution is inconsequential.
- 2.15 The following plans and guidance notes are considered to have the potential to act in-combination with the RLPP:
- Hastings Draft Local Plan 2019-2039¹¹
 - East Sussex, South Downs, and Brighton & Hove Waste and Minerals Plan (2013)¹²
 - East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan - Revised Policies¹³
 - Folkestone and Hythe Core Strategy Review 2022¹⁴
 - Kent Waste and Minerals Local Plan (2016) ¹⁵
 - KMWLP as amended by the Early Partial Review 2020¹⁶
 - Wealden Draft Local Plan (Regulation 18) March 2024¹⁷

¹⁰ Opinion of Advocate General Kokott, 9th June 2005, Case C-6/04. Commission of the European Communities v United Kingdom of Great Britain and Northern Ireland, paragraph 49

<http://curia.europa.eu/juris/document/document.jsf?docid=58359&doclang=EN>

¹¹ <https://hastings.oc2.uk/> [Accessed 23/02/24]

¹² <https://eastsussex.objective.co.uk/file/2442406> [Accessed 23/02/24]

¹³ <https://eastsussex.objective.co.uk/file/6244231> [Accessed 08/04/24]

¹⁴ [Folkestone & Hythe District Council Core Strategy Review 2022 \(folkestone-hythe.gov.uk\)](https://www.folkestone-hythe.gov.uk/) [Accessed 23/02/24]

¹⁵ Available at https://www.kent.gov.uk/_data/assets/pdf_file/0004/112585/Kent-Minerals-and-Waste-Local-Plan-2013-2030.pdf [Accessed 08/04/24]

¹⁶ Available at <https://www.wealden.gov.uk/UploadedFiles/Full-Draft-Local-Plan-Accessible-Version-RGB-2.pdf> [Accessed 05/03/24]

¹⁷ Available at [adopted-ashford-local-plan-2030.pdf](https://www.adopted-ashford-local-plan-2030.pdf) [Accessed 05/03/24]

- Ashford Local Plan Adopted February 2019 ¹⁸
- Tunbridge Wells Borough Local Plan 2020 – 2038 Submitted October 2021 ¹⁹
- South Downs Local Plan 2014-2033²⁰

2.16 It should be noted that, while their broad potential effects are considered, this assessment does not undertake full HRA of each of these planning documents. Instead, existing HRAs that have been carried out for surrounding LPAs were drawn upon.

¹⁸ <https://www.kent.gov.uk/about-the-council/strategies-and-policies/service-specific-policies/housing,-regeneration-and-planning-policies/planning-policies/minerals-and-waste-planning-policy> [Accessed 05/03/24]

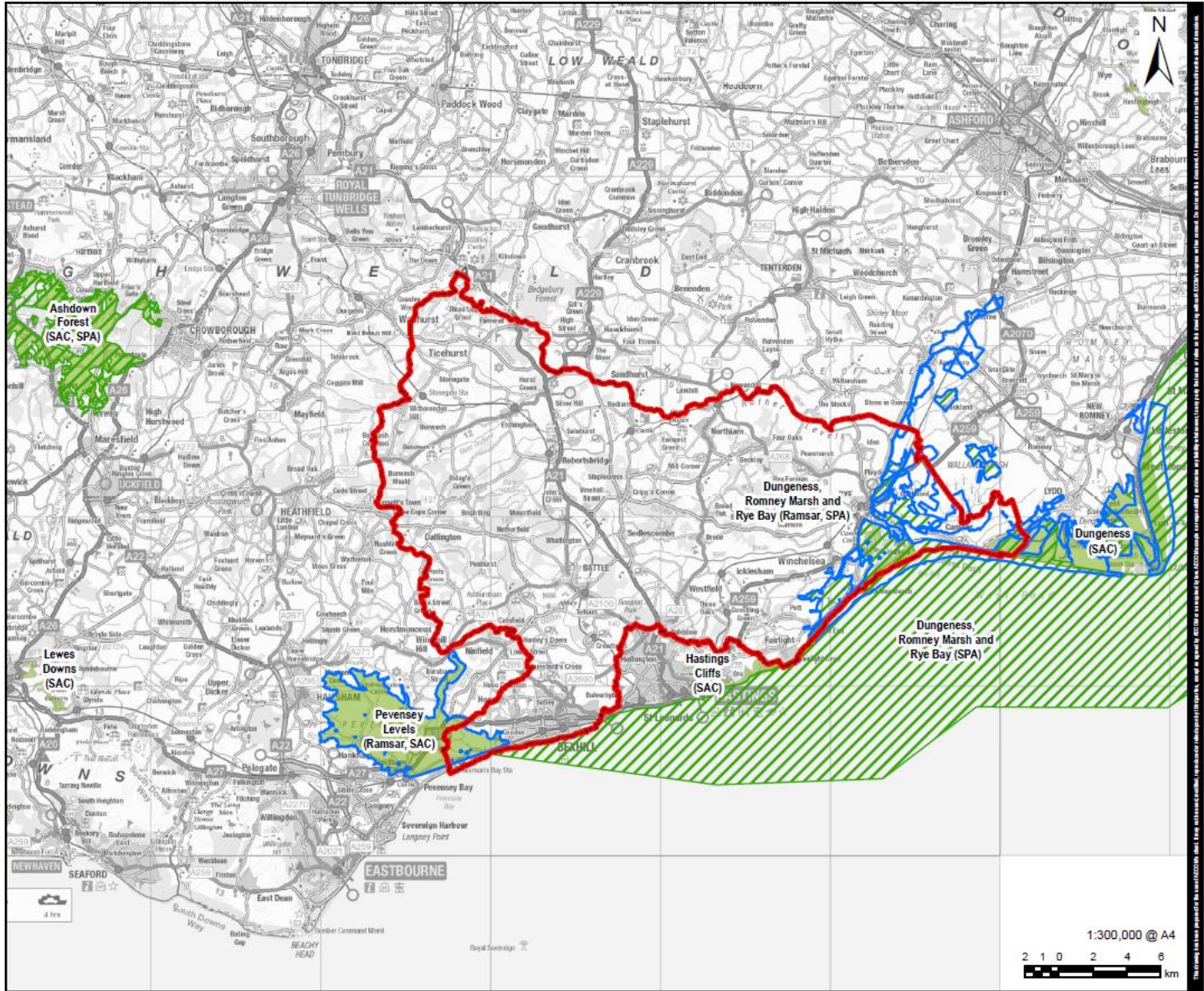
¹⁹ Available at [Submission Local Plan \(tunbridgewells.gov.uk\)](https://www.tunbridgewells.gov.uk/submitting-local-plan) [Accessed 05/03/24]

3. Habitats Sites

Figure 3 Habitats Sites relevant to the Rother Local Plan HRA

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LEGEND

- Rother District
- Ramsar
- Special Protection Area (SPA)
- Special Area of Conservation (SAC)

NOTES

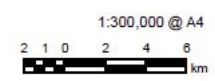
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ISSUE PURPOSE
FOR INFORMATION

PROJECT NUMBER
60719400

FIGURE TITLE
European Sites Within and Surrounding Rother District

FIGURE NUMBER
Figure 1



Ashdown Forest SAC

Introduction

- 3.1 Ashdown Forest (approximately 15 km to the west of the Rother District) contains one of the largest single continuous blocks of lowland heath in south-east England, with both dry heaths and, in a larger proportion, wet heath. The wet heath element provides suitable conditions for several species of bog-mosses (*Sphagnum spp.*), bog asphodel (*Narthecium ossifragum*), deergrass (*Trichophorum cespitosum*), common cotton-grass (*Eriophorum angustifolium*), marsh gentian (*Gentiana pneumonanthe*) and marsh clubmoss (*Lycopodiella inundata*). The site supports important assemblages of beetles, dragonflies, damselflies and butterflies, including the nationally rare silver-studded blue (*Plebejus argus*).
- 3.2 The dry heath in Ashdown Forest is dominated by heather (*Calluna vulgaris*), bell heather (*Erica cinerea*) and dwarf gorse (*Ulex minor*), with transitions to other habitats. It supports important lichen assemblages, including species such as *Pycnothelia papillaria*. This site supports the most inland remaining population of hairy greenweed (*Genista Pilosa*) in Britain.
- 3.3 The damming of streams, digging for marl, and quarrying have produced several large ponds in a number of areas of the forest. Although often largely free of aquatic vegetation there may be localised rafts of broadleaved pondweed (*Potamogeton natans*), beds of reedmace (*Typha latifolia*) and water horsetail (*Equisetum fluviatile*). These species are particularly abundant in the marl pits. Some of the ponds have large amphibian populations, including the great crested newt (*Triturus cristatus*).

Qualifying Features²¹

- 3.4 Annex I habitats that are a primary reason for selection of this site:
- H4010 Northern Atlantic wet heaths with *Erica tetralix*
 - H4030 European dry heaths
- 3.5 Annex II species present as a qualifying feature, but not a primary reason for site selection:
- S1166 Great-crested newt *Triturus cristatus*

Conservation Objectives^{22 23}

- 3.6 With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features'), and subject to natural change;
- 3.7 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;
- The extent and distribution of qualifying natural habitats and habitats of qualifying species
 - The structure and function (including typical species) of qualifying natural habitats
 - The structure and function of the habitats of qualifying species

²¹ Available at: <https://publications.naturalengland.org.uk/file/6357909449474048> [Accessed on 12/12/2023]

²² Available at: <https://publications.naturalengland.org.uk/file/6711339502534656> [Accessed on 12/12/2023]

²³ Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0030080.pdf> [Accessed on 12/12/2023]

- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

Threats / Pressures on Site Integrity²⁴

- 3.8 Natural England's Site Improvement Plan lists the following threats / pressure on the site integrity of the Ashdown Forest SAC and Ashdown Forest SPA:
- Change in land management,
 - Air pollution: Impact of atmospheric nitrogen deposition,
 - Public access / disturbance,
 - Hydrological changes.

Ashdown Forest SPA

Introduction

- 3.9 The Ashdown Forest SPA (approximately 15 km to the west of the Rother district boundary) is an extensive area of common land on mainly sandy soils between East Grinstead and Crowborough in East Sussex. It comprises a mosaic of wet and dry heath, valley bog and woodland, and supports several uncommon plants, a rich invertebrate fauna and nationally important numbers of breeding nightjar and Dartford warbler.

Qualifying Features²⁵

- 3.10 This site qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting populations of national importance of the following species:

Breeding species:

- A224 European nightjar (*Caprimulgus europaeus*)
- A302 Dartford warbler (*Sylvia undata*)

Conservation Objectives^{26 27}

- 3.11 With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;
- 3.12 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;
- The extent and distribution of the habitats of the qualifying features
 - The structure and function of the habitats of the qualifying features
 - The supporting processes on which the habitats of the qualifying features rely

²⁴ Available at: <https://publications.naturalengland.org.uk/file/6679502935556096> [Accessed on the 12/12/2023]

²⁵ Available at: <https://publications.naturalengland.org.uk/file/6357909449474048> [Accessed on 12/12/2023]

²⁶ Available at: <https://publications.naturalengland.org.uk/file/6711339502534656> [Accessed on 12/12/2023]

²⁷ Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0030080.pdf> [Accessed on 12/12/2023]

- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

Threats / Pressures on Site Integrity²⁸

3.13 Natural England's Site Improvement Plan lists the following threats / pressure on the site integrity of the Ashdown Forest SAC and Ashdown Forest SPA:

- Change in land management,
- Air pollution: Impact of atmospheric nitrogen deposition,
- Public access / disturbance,
- Hydrological changes.

Dungeness SAC Introduction

3.14 Dungeness SAC (within and to the east of the Rother District) consists of the UK's largest shingle structure which is one of the best examples of a vegetated shingle beach in Britain and Europe. The shingle beach has many diverse features such as vegetated shingle comprising of two Annex 1 Habitats (Perennial Vegetation of Stony Banks (PVSB) and Annual Vegetation of Drift Lines (AVDL)), saline lagoons, natural freshwater pits and basin fens. These in turn support over 600 species of plants, many uncommon, and one of the most important assemblages of invertebrates in Britain with an unusually high number of rare and scarce species, including some endemics.

3.15 The combination of the shingle beaches, dunes, reedbeds, saltmarsh and grazing marshes result in a landscape that is renowned for its impressive geomorphology, and that is considered one of the best examples of a Cuspate Foreland in the world. The active and static geomorphological interest of the area is an SSSI notification feature and is described as underpinning the Habitats site designations. The active processes have created and continue to create the unique habitats found at Dungeness. It is fundamental to the mix of animals and plants found on the site.

Qualifying Features²⁹

3.16 Annex I habitats:

- 1210 Annual vegetation of drift lines
- 1220 Perennial vegetation of stony banks

3.17 Annex II species present that are a primary reason for site selection:

- 1166 Great-crested newt *Triturus cristatus*

Conservation Objectives³⁰

3.18 With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features'), and subject to natural change;

3.19 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

²⁸ Available at: <https://publications.naturalengland.org.uk/file/6679502935556096> [Accessed on the 12/12/2023]

²⁹ Available at: <https://sac.jncc.gov.uk/site/UK0013059> [Accessed on the 08/11/2023]

³⁰ Available at: <https://publications.naturalengland.org.uk/file/6239619956080640> [Accessed on the 08/11/2023]

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

Threats / Pressures to Site Integrity

3.20 The following threats / pressures to the integrity of the Dungeness SAC have been identified in Natural England's Site Improvement Plan³¹ for the SAC:

- Military,
- Vehicles: Illicit,
- Predation,
- Changes in species distribution,
- Invasive species,
- Inappropriate scrub control,
- Overgrazing,
- Public Access/Disturbance,
- Direct impact from 3rd party,
- Air pollution: Impact of atmospheric deposition,
- Inappropriate water levels,
- Inappropriate ditch management,
- Coastal squeeze,
- Water pollution,
- Fisheries: Commercial marine and estuarine.

Dungeness, Romney Marsh and Rye Bay SPA

Introduction³²

3.21 Dungeness, Romney Marsh and Rye Bay SPA is located (within and to the east of the Rother district boundary) on the south coast of England between Hythe in Kent crossing the county border of East Sussex to Norman's Bay. This is a large area with a diverse coastal and marine landscape comprising a number of habitats, which appear to be unrelated to each other. However, all of them persist because coastal processes have formed and continue to shape a barrier of extensive coastal shingle beaches and sand dunes across an area of intertidal mud and sand flats. The site includes the largest and most diverse area of shingle beach in Britain, with low-lying hollows in the shingle providing

³¹ Available at: <https://publications.naturalengland.org.uk/publication/6291480347934720> [Accessed on the 08/11/2023]

³² Available at: <https://publications.naturalengland.org.uk/file/4840798817878016> [Accessed on the 08/11/2023]

nationally important saline lagoons, natural freshwater pits and basin fens. Rivers draining the Weald to the north were diverted by the barrier beaches, creating a sheltered saltmarsh and mudflat environment, which was gradually infilled by sedimentation, and then reclaimed on a piecemeal basis by man. This area is fringed by important intertidal habitats, and contains relict areas of saltmarsh, extensive grazing marshes and reedbeds.

- 3.22 The site also includes a diverse range of broadscale habitats within the marine environment which support a variety of prey species for the foraging seabirds. These habitats include subtidal and intertidal sand and muddy sand, subtidal biogenic reef, intertidal stony reef, coarse and mixed sediments, and moderate energy infralittoral and circalittoral rock.

Qualifying Species³³

- 3.23 This site qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting populations of European importance of the following species:

Breeding species:

- A081 Marsh Harrier (*Circus aeruginosus*),
- A132 Avocet (*Recurvirostra avosetta*),
- A176 Mediterranean Gull (*Larus melanocephalus*),
- A191 Sandwich Tern (*Sterna sandvicensis*),
- A193 Common Tern (*Sterna hirundo*),
- A195 Little Tern (*Sterna albifrons*).

Passage species

- A294 Aquatic Warbler (*Acrocephalus paludicola*)

Wintering species

- A037 Bewick's Swan (*Cygnus columbianus bewickii*)
- A021 Great Bittern (*Botaurus stellaris*),
- A082 Hen Harrier (*Circus cyaneus*),
- A140 Golden Plover (*Pluvialis apricaria*),
- A151 Ruff (*Philomachus pugnax*),

- 3.24 This site also qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting populations of importance:

- A056 Shoveler (*Anas clypeata*).

Conservation Objectives³⁴

- 3.25 With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features'), and subject to natural change;
- 3.26 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

³³ Available at: <https://publications.naturalengland.org.uk/file/4840798817878016> [Accessed on the 08/11/2023]

³⁴ Available at: <https://publications.naturalengland.org.uk/file/6239619956080640> [Accessed on the 12/12/2023]

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats,
- The structure and function of the habitats of qualifying species,
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely,
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

Threats / Pressures to Site Integrity

3.27 The key environmental sensitivities and impact pathways are summarised in the corresponding section on the Dungeness SAC above because Natural England's Site Improvement Plan covers both the SAC and SPA Further detail of features is provided in the supplementary advice provided by Natural England³⁵.

Dungeness, Romney Marsh and Rye Bay Ramsar

Introduction

- 3.28 Dungeness, Romney Marsh and Rye Bay is located on the south coast of England (within and to the east of the Rother district boundary), on the border of East Sussex and Kent between Hastings and New Romney. This is a large area with a diverse coastal landscape comprising a number of habitats, which appear to be unrelated to each other. However, all of them exist today because coastal processes have formed and continue to shape a barrier of extensive shingle beaches and sand dunes across an area of intertidal mud and sand flats. The site includes the largest and most diverse area of shingle beach in Britain, with low-lying hollows in the shingle providing nationally important saline lagoons, natural freshwater pits and basin fens. Rivers draining the Weald to the north were diverted by the barrier beaches, creating a sheltered saltmarsh and mudflat environment, which was gradually in-filled by sedimentation, and then reclaimed on a piecemeal basis by man.
- 3.29 Today this area is still fringed by important intertidal habitats, and contains relict areas of saltmarsh, extensive grazing marshes and reedbeds. Human activities have further modified the site, resulting in the creation of extensive areas of wetland habitat due to gravel extraction. As a whole, Dungeness, Romney Marsh and Rye Bay is important for breeding, wintering and passage waterbirds, wetland plants, bryophytes and invertebrates, and natural or near-natural wetland habitats. In addition to the internationally important wetland habitats and species, the Ramsar site and adjacent areas are also of national and international importance for a variety of non-wetland habitats and species.

Qualifying Criteria³⁶

3.30 The site qualifies as a Ramsar site under the following criteria

Criterion 1

The site qualifies under Criterion 1 because it contains representative, rare, or unique examples of natural or near-natural wetland types:

- Annual vegetation of drift lines and the coastal fringes of perennial vegetation of stony banks (Ramsar wetland type E – sand, shingle or pebble shores)

³⁵ Available at: [Designated Sites View \(naturalengland.org.uk\)](https://naturalengland.org.uk/designated-sites-view) [Accessed on the 12/12/2023]

³⁶ Available at: [dungeness-romney-rye-ramsar-documents.pdf \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/dungeness-romney-rye-ramsar-documents.pdf) [Accessed on the 29/02/2024]

- Natural shingle wetlands: saline lagoons (Ramsar wetland type J – coastal brackish/saline lagoons), freshwater pits (Ramsar wetland type K – coastal freshwater lagoons) and basin fens (Ramsar wetland type U – non-forested peatlands)

Criterion 2

The site qualifies under Criterion 2 because it supports threatened ecological communities:

- The bryophyte flora includes an assemblage of wetland thread-mosses *Bryum* species. These mosses are colonists of unshaded calcareous sand that must be persistently damp all year but not inundated by standing water. They occur on wet sand beside large freshwater gravel pits and small pools in Dungeness RSPB Reserve.
- Foremost amongst the assemblage are the suites of species associated with grazing marsh and saltmarsh (including brackish ditches and wetlands associated with low-lying depressions within shingle areas). Saltmarshes and other brackish wetlands are particularly rich, with at least eight nationally scarce species, including the vulnerable sea barley *Hordeum marinum*, Borrer's saltmarsh-grass *Puccinellia fasciculata* and slender hare's-ear *Bupleurum tenuissimum*, and the near-threatened sea-heath *Frankenia laevis*. Grazing marshes support the nationally rare (and critically endangered) sharp-leaved pondweed *Potamogeton acutifolius* and at least six nationally scarce species, including the vulnerable divided sedge *Carex divisa* and rootless duckweed *Wolffia arrhiza*. The remaining species are chiefly associated with gravel pits and their margins, saline lagoons, shingle beaches and fens.
- The freshwater wetlands (with the exception of the deep, cold and largely sterile open waters of the main gravel pits) exhibit a number of similar characteristics. Shallow open water and emergent vegetation, largely comprising common reed *Phragmites australis* and bulrush *Typha latifolia*, supports a rich water beetle assemblage. Other noteworthy aspects of the invertebrate assemblage include a suite of reed beetles *Donacia*, snail-killing flies (Sciomyzidae) and soldierflies (Stratiomyidae) that are typical of coastal marshes. Much of this assemblage is found within the ditch systems. The saline and brackish gradients of the saltmarsh, saline lagoons, brackish ditches and damp brackish hollows in the shingle beaches also share many characteristics in terms of the habitats they provide for invertebrates.
- The site also supports 9 individual wetland species of international importance that are vulnerable, endangered or critically endangered, including greater water-parsnip *Sium latifolium* (UK BAP priority species), Warne's thread-moss *Bryum warneum* (UK BAP priority species), water vole *Arvicola amphibious* (UK BAP priority species), aquatic warbler *Acrocephalus paludicola* (UK BAP priority species), great-crested newt *Triturus cristatus* (UK BAP priority species), medicinal leech *Hirudo medicinalis* (Red Data Book species), a ground beetle *Omophron limbatum* (Red Data Book species), marsh mallow moth *Hydraecia osseola hucherardi* (UK BAP priority species and Red Data Book species) and De Folin's lagoon snail *Caecum amoricum*

Criterion 5

The site qualifies under Criterion 5 because it regularly supports 20,000 or more waterbirds. In the non-breeding season, the site regularly supports 34,957 individual waterbirds (5 year peak mean 2002/3 – 2006/7).

Criterion 6

The site qualifies under Criterion 6 because it regularly supports 1% of the individuals in the populations of the following species or subspecies of waterbird in any season:

- Mute swan *Cygnus olor*; 348 individuals (1.1%) of the overwintering Britain population (5-year peak mean 2002/3-2006/7),
- Northern shoveler *Anas clypeata*; 485 individuals (1.2%) of the overwintering NW & C Europe population (5-year peak mean 2002/3-2006/7).

Conservation Objectives

3.31 Not defined for Ramsar sites.

Threats / Pressures to Site Integrity³⁷

3.32 The key environmental sensitivities and impact pathways are summarised in the corresponding section on the Dungeness SAC above because Natural England's Site Improvement Plan covers both the SAC and SPA. The Ramsar citation does not include any additional threats or pressures.

Hasting Cliffs SAC

Introduction

3.33 This SAC (adjacent to the south of the Rother district boundary) is a 182.47ha large site comprising a variety of habitats, including shingle / sea cliffs (30%), broad-leaved deciduous woodland (25%), heath / scrub (13%) and dry grassland (8%). The Hastings Cliffs are located on England's south coast and are an area of actively eroding soft cliffs, including the most southerly exposure of the lower Hastings Beds. Within the SAC are three valleys which support woodland and scrub with a rare bryophyte flora. On the border with the sea, tree growth is stunted and bryophytes are dominant, including the fragrant crestwort *Lophocolea fragrans*. Close to the cliff edges there is maritime scrub, coastal heathland and grasslands sustaining various maritime species (e.g. thrift *Armeria maritima*). Active processes such as erosion are required to sustain the succession of the SAC's habitats.

3.34 The SAC is situated within the High Weald Area of Outstanding Natural Beauty (AONB) and the High Weald National Character Area. The Hastings Cliffs also partly overlap with the Hastings Country Park Local Nature Reserve (LNR), which is popular for recreational activities such as countryside hiking. One of its important characteristics is that it reveals where the Weald's sand and clay geologies are exposed to the sea. The cliffs are permeated by many faults, which make it an important site for botanical and vertebrate fossils. Dinosaur footprints and petrified forests are visible during low tides.

Qualifying Features³⁸

3.35 Annex I habitats:

- H1230 Vegetated sea cliffs of the Atlantic and Baltic coasts

Conservation Objectives³⁹

3.36 With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features'), and subject to natural change;

3.37 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

³⁷ Available at: <http://publications.naturalengland.org.uk/publication/5793096570765312> [Accessed on the 12/12/2023]

³⁸ Available at: <https://publications.naturalengland.org.uk/file/5060393060007936> [Accessed on the 08/11/2023]

³⁹ Available at: <https://sac.incc.gov.uk/site/UK0013059> [Accessed on the 08/11/2023]

- The extent and distribution of qualifying natural habitat,
- The structure and function (including typical species) of qualifying natural habitat, and
- The supporting processes on which qualifying natural habitat rely.

Threats / Pressures to Site Integrity

3.38 The following threats / pressures to the integrity of the Dungeness SAC have been identified in Natural England's Site Improvement Plan⁴⁰ for the SAC:

- Inappropriate Coastal Management,
- Water pollution, and
- Air pollution: Risk of atmospheric nitrogen deposition.

Lewes Downs SAC

Introduction⁴¹

3.39 Lewes Downs (approximately 22 km to the west of the Rother district boundary) is an isolated block of downland which forms part of the South Downs. It is important for the extremely rich chalk grassland and scrub vegetation, which contains a number of southern and oceanic-southern species as well as a nationally rare orchid. The site also supports a rich invertebrate fauna including a rare moth, and an important breeding community of downland birds.

3.40 This block of downland has a south-facing scarp slope which is an unusual feature within the South Downs. The majority of the site comprises unimproved species-rich chalk grassland, developed on steep slopes over thin rendzina soils. Other habitats which add to the diversity and interest of the site include areas of mixed scrub and semi-natural woodland.

3.41 Lewes Downs is situated within the South Downs National Character Area (NCA). The South Downs area consists of dramatic white chalk cliffs and downland which create a sense of openness, whilst both enclosure and remoteness can be found in woodland and even in close proximity to urban areas. The Arun, Adur, Cuckmere and Ouse Rivers in the area dissect the chalk ridge in its eastern half, separating it into blocks, as they drain south to the sea.

Qualifying Features⁴²

3.42 Annex I habitats that are a primary reason for selection of this site:

- H6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (*Festuco-Brometalia*) (important orchid sites); Dry grasslands and scrublands on chalk or limestone (important orchid sites).

Conservation Objectives⁴³

3.43 With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features'), and subject to natural change;

⁴⁰ Available at: <https://publications.naturalengland.org.uk/file/6205547831361536> [Accessed on the 08/11/2023]

⁴¹ Available at: <https://publications.naturalengland.org.uk/file/6413276653289472> [Accessed on the 09/11/2023]

⁴² Available at: <https://publications.naturalengland.org.uk/file/6589251500376064>

<https://sac.jncc.gov.uk/site/UK0012832> [Accessed on the 09/11/2023]

⁴³ Available at: <https://publications.naturalengland.org.uk/file/6589251500376064> [Accessed on the 09/11/2023]

- 3.44 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;
- The extent and distribution of qualifying natural habitats,
 - The structure and function (including typical species) of qualifying natural habitats, and
 - The supporting processes on which qualifying natural habitats rely.

Threats / Pressures to Site Integrity⁴⁴

- 3.45 Natural England's Site Improvement Plan highlights the following threats / pressures to the site integrity of the Lewes Downs SAC:
- Game management: Pheasant rearing,
 - Undergrazing,
 - Public access / disturbance, and
 - Air pollution: Impact of atmospheric nitrogen deposition.

Pevensey Levels Ramsar

Introduction

- 3.46 The Pevensey Levels (within and to the west of the Rother district boundary) is one of the largest and least-fragmented lowland wet grassland systems in southeast England. The low-lying grazing meadows are intersected by a complex system of ditches which support a variety of important wetland communities, including nationally rare and scarce aquatic plants and invertebrates. The site also supports a notable assemblage of breeding and wintering wildfowl. A small area of shingle and intertidal muds and sands is included within the site.

Qualifying Criteria⁴⁵

- 3.47 The site qualifies as a Ramsar site under the following criteria:

Criterion 2

The site supports an outstanding assemblage of wetland plants and invertebrates including many British Red Data Book species.

Criterion 3

The site supports 68% of vascular plant species in Great Britain that can be described as aquatic. It is probably the best site in Britain for freshwater molluscs, one of the five best sites for aquatic beetles Coleoptera and supports an outstanding assemblage of dragonflies Odonata.

Conservation Objectives

- 3.48 Not defined.

⁴⁴ Available at: <https://publications.naturalengland.org.uk/file/5534055007256576> [Accessed on the 12/12/2023]

⁴⁵ Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11053.pdf> [Accessed on the 12/12/2023]

Threats / Pressures to Site Integrity

- 3.49 The following threats / pressures to the integrity of the Pevensey Levels Ramsar have been identified in the Ramsar information sheet⁴⁶ :
- Introduction/invasion of non-native plant species.
 - Water quality – pollution from domestic sewage

Pevensey Levels SAC

Introduction

- 3.50 Pevensey Levels SAC is located in the low-lying area between Eastbourne and Bexhill in East Sussex. The High Weald Area of Outstanding Natural Beauty (AONB) lies to the northeast, the South Downs National Park to the southwest and the English Channel to the south.
- 3.51 The site lies within the Pevensey Levels National Character Area and is described as a low-lying, open landscape with few trees and wide views to surrounding high ground and the sea, giving the impression of remoteness. The geology of the Pevensey Levels consists of sandstones and clays overlain by fairly impermeable marine silts and clay. The combination of the flat and low-lying nature of the topography and poor drainage of the soils can result in long periods of standing water on the surface, particularly in winter, encouraging associated flocks of birds to the wet fields.
- 3.52 The area is largely reclaimed land with extensive grazed wet meadows actively maintained by purpose-built drainage systems and characteristic dykes. A small area of shingle and intertidal muds and sands is included within the site. The freshwater ditches criss-crossing the site reflect the historic reclamation of land which has been continuous since the 13th century. The relative permanence of the ditches and the continued pastoral use of much of the area mean that this landscape is a remarkable survival of a medieval field system in a lowland context.
- 3.53 The network of freshwater ditches provide botanical interest, public water supplies and wet fences for stock control, and act as flood storage reservoirs. Consequently, Pevensey Levels is one of the largest and least-fragmented lowland wet grassland systems in southeast England. The SAC feature is a small freshwater snail, little whirlpool ram's-horn snail (*Anisus vorticulus*). The site also supports a variety of important wetland communities, including nationally rare and scarce aquatic plants and invertebrates, and a notable assemblage of breeding and wintering wildfowl.
- 3.54 The site is of hydrological value for shoreline stabilisation and dissipation of erosive forces, recharge and discharge of groundwater, flood water storage / desynchronisation of flood peaks, and maintenance of water quality (removal of nutrients).
- 3.55 The majority of the site is used for low intensity livestock farming. Nearly all land within the SAC is under private ownership comprising approximately 200 owner occupiers and about 60 – 80 active managers. A small portion of the site area (around 100 hectares) is owned by Natural England and Sussex Wildlife Trust. Current recreation and tourism activities include walking and horse riding on the public footpaths and bridleways, recreational cycling, angling, and rowing.

Qualifying Features⁴⁷

- 3.56 Annex I species:

⁴⁶ Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11053.pdf> [Accessed on the 08/11/2023]

⁴⁷ Available at: <https://publications.naturalengland.org.uk/file/6099562012082176> [Accessed on the 08/11/2023]

- S4056 *Anisus vorticulus*; Little whirlpool ram's-horn snail

Conservation Objectives⁴⁸

- 3.57 With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features'), and subject to natural change;
- 3.58 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;
- The extent and distribution of the habitats of qualifying species,
 - The structure and function of the habitats of qualifying species,
 - The supporting processes on which the habitats of qualifying species rely,
 - The populations of qualifying species, and,
 - The distribution of qualifying species within the site.

Threats / Pressures to Site Integrity

- 3.59 The following threats / pressures to the integrity of the Pevensey Levels SAC have been identified in Natural England's Site Improvement Plan⁴⁹ :
- Inappropriate water levels,
 - Invasive species, and
 - Water pollution.

4. Identified Impact Pathways

Atmospheric Pollution (Nitrogen Deposition)

- 4.1 The main pollutants of concern for Habitats Sites are oxides of nitrogen (NO_x), ammonia (NH₃) and sulphur dioxide (SO₂) and are summarised in Table 1. Ammonia can have a directly toxic effect upon vegetation, particularly at close distances to the source such as near road verges⁵⁰. NO_x can also be toxic at very high concentrations (far above the annual average Critical Level). High levels of NO_x and NH₃ are likely to increase the total nitrogen (N) deposition to soils, potentially leading to deleterious knock-on effects in resident ecosystems. Increases in nitrogen deposition from the atmosphere can, if sufficiently great, enhance soil fertility and lead to eutrophication. This often has adverse effects on the community composition and quality of semi-natural, nitrogen-limited terrestrial and aquatic habitats^{51 52}.

⁴⁸ Ibid

⁴⁹ Available at: <https://publications.naturalengland.org.uk/file/6616793980338176> [Accessed on the 08/11/2023]

⁵⁰ http://www.apis.ac.uk/overview/pollutants/overview_NOx.htm.

⁵¹ Wolseley, P. A.; James, P. W.; Theobald, M. R.; Sutton, M. A. (2006). Detecting changes in epiphytic lichen communities at sites affected by atmospheric ammonia from agricultural sources. *Lichenologist* **38**: 161-176.

⁵² Dijk, N. (2011). Dry deposition of ammonia gas drives species change faster than wet deposition of ammonium ions: evidence from a long-term field manipulation. *Global Change Biology* **17**: 3589-3607.

Table 1: Main sources and effects of air pollutants on habitats and species⁵³

Pollutant	Source	Effects on habitats and species
Sulphur Dioxide (SO ₂)	<p>The main sources of SO₂ are electricity generation, and industrial and domestic fuel combustion. However, total SO₂ emissions in the UK have decreased substantially since the 1980's.</p> <p>Another origin of sulphur dioxide is the shipping industry and high atmospheric concentrations of SO₂ have been documented in busy ports. In future years shipping is likely to become one of the most important contributors to SO₂ emissions in the UK.</p>	<p>Wet and dry deposition of SO₂ acidifies soils and freshwater, and may alter the composition of plant and animal communities.</p> <p>The magnitude of effects depends on levels of deposition, the buffering capacity of soils and the sensitivity of impacted species.</p> <p>However, SO₂ background levels have fallen considerably since the 1980's and are now not regarded a threat to plant communities. For example, decreases in Sulphur dioxide concentrations have been linked to returning lichen species and improved tree health in London.</p>
Acid deposition	<p>Leads to acidification of soils and freshwater via atmospheric deposition of SO₂, Nox, ammonia, and hydrochloric acid. Acid deposition from rain has declined by 85% in the last 20 years, which most of this contributed by lower sulphate levels.</p>	<p>Gaseous precursors (e.g. SO₂) can cause direct damage to sensitive vegetation, such as lichen, upon deposition.</p> <p>Can affect habitats and species through both wet (acid rain) and dry deposition. The effects of acidification include lowering of soil pH, leaf chlorosis, reduced decomposition rates, and compromised reproduction in birds / plants.</p> <p>Not all sites are equally susceptible to acidification. This varies depending on soil type, bed rock geology, weathering rate and buffering capacity. For example, sites with an underlying geology of granite, gneiss and quartz rich rocks tend to be more susceptible.</p>
Ammonia (NH ₃)	<p>Ammonia is a reactive, soluble alkaline gas that is released following decomposition and volatilisation of animal wastes. It is a naturally occurring trace gas, but ammonia concentrations are directly related to the distribution of livestock and also emits from some industrial processes and some vehicle exhausts.</p> <p>Ammonia reacts with acid pollutants such as the products of SO₂ and NO_x emissions to produce fine ammonium (NH₄⁺) – containing aerosol. Due to its significantly longer lifetime, NH₄⁺ may be transferred much longer distances (and can therefore be a significant trans-boundary issue).</p> <p>While ammonia deposition may be estimated from its atmospheric concentration, the deposition rates are strongly influenced by meteorology and ecosystem type.</p>	<p>The negative effect of NH₄⁺ may occur via direct toxicity, when uptake exceeds detoxification capacity and via nitrogen accumulation.</p> <p>Its main adverse effect is eutrophication, leading to species assemblages that are dominated by fast-growing and tall species. For example, a shift in dominance from heath species (lichens, mosses) to grasses is often seen.</p> <p>As emissions mostly occur at ground level in the rural environment and NH₃ is rapidly deposited, some of the most acute problems of NH₃ deposition are for small relict nature reserves located in intensive agricultural landscapes.</p>
Nitrogen oxides (NO _x)	<p>Nitrogen oxides are mostly produced in combustion processes. Half of NO_x emissions in the UK derive from motor vehicles, one quarter from power stations and the rest from other industrial and domestic combustion processes. Nox concentrations have been falling for decades due to improvements in vehicle emissions</p>	<p>Direct toxicity effects of gaseous nitrates are likely to be important in areas close to the source (e.g. roadside verges). A critical level of Nox for all vegetation types has been set to 30 ug/m3.</p>

⁵³ Information summarised from the Air Pollution Information System (<http://www.apis.ac.uk/>).

Pollutant	Source	Effects on habitats and species
	technology and this will accelerate after 2035 as electric vehicles (or other non-combustion engine vehicles) spread through the vehicle fleet following the Government's ban on the sale of new petrol and diesel cars and vans in 2035.	Deposition of nitrogen compounds (nitrates (NO ₃), nitrogen dioxide (NO ₂) and nitric acid (HNO ₃)) contributes to the total nitrogen deposition and may lead to both soil and freshwater acidification. In addition, NO _x contributes to the eutrophication of soils and water, altering the species composition of plant communities at the expense of sensitive species.
Nitrogen deposition (N)	The pollutants that contribute to the total nitrogen deposition derive mainly from oxidized (e.g. NO _x) or reduced (e.g. NH ₃) nitrogen emissions (described separately above). While oxidized nitrogen mainly originates from major conurbations or highways, reduced nitrogen mostly derives from farming practices. The nitrogen pollutants together are a large contributor to acidification (see above).	All plants require nitrogen compounds to grow, but too much overall N is regarded as the major driver of biodiversity change globally. Species-rich plant communities with high proportions of slow-growing perennial species and bryophytes are most at risk from nitrogen eutrophication. This is because many semi-natural plants cannot assimilate the surplus nitrogen as well as many graminoid (grass) species. Nitrogen deposition can also increase the risk of damage from abiotic factors, e.g. drought and frost.
Ozone (O ₃)	A secondary pollutant generated by photochemical reactions involving No _x , volatile organic compounds (VOCs) and sunlight. These precursors are mainly released by the combustion of fossil fuels (as discussed above). Increasing anthropogenic emissions of ozone precursors in the UK have led to an increased number of days when ozone levels rise above 40ppb ('episodes' or 'smog'). Reducing ozone pollution is believed to require action at international level to reduce levels of the precursors that form ozone.	Concentrations of O ₃ above 40 ppb can be toxic to both humans and wildlife, and can affect buildings. High O ₃ concentrations are widely documented to cause damage to vegetation, including visible leaf damage, reduction in floral biomass, reduction in crop yield (e.g. cereal grains, tomato, potato), reduction in the number of flowers, decrease in forest production and altered species composition in semi-natural plant communities.

- 4.2 Sulphur dioxide emissions overwhelmingly derive from power stations and industrial processes that require the combustion of coal and oil, as well as (particularly on a local scale) shipping⁵⁴. As such these will not be associated with Local Plan growth. Ammonia emissions originate from agricultural practices⁵⁵, with some chemical processes also making notable contributions and traffic also contributing materially at a local scale. NO_x emissions are dominated by the output of vehicle exhausts (more than half of all emissions). A 'typical' housing development will contribute by far the largest portion of its overall NO_x footprint (92%) through associated road traffic. Other sources, although relevant, are of minor importance (8%) in comparison⁵⁶. Therefore, emissions of NO_x and ammonia can reasonably be expected to increase as a result of the Plan, primarily due to an increase in the volume of commuter traffic associated with housing growth.
- 4.3 The World Health Organisation has the following critical thresholds for plant communities: The critical NO_x concentration (critical level) for the protection of vegetation is 30 µgm⁻³ and the critical level for ammonia 1-3 µgm⁻³ (depending on whether normal vegetation or

⁵⁴ http://www.apis.ac.uk/overview/pollutants/overview_SO2.htm.

⁵⁵ Pain, B.F.; Weerden, T.J.; Chambers, B.J.; Phillips, V.R.; Jarvis, S.C. (1998). A new inventory for ammonia emissions from U.K. agriculture. *Atmospheric Environment* **32**: 309-313.

⁵⁶ Proportions calculated based upon data presented in Dore CJ et al. 2005. UK Emissions of Air Pollutants 1970 – 2003. UK National Atmospheric Emissions Inventory. <http://www.airquality.co.uk/archive/index.php> [Accessed on the 21/10/2021]

lichens and bryophytes are involved). Additionally, ecological studies have determined 'Critical Loads'⁵⁷ of atmospheric nitrogen deposition (that is, NO_x combined with ammonia NH₃).

- 4.4 According to the Department of Transport's Transport Analysis Guidance, beyond 200m, the contribution of vehicle emissions from the roads to local pollution levels is insignificant (Figure 4 and reference ⁵⁸). Therefore, this distance has been used throughout this HRA to determine whether Likely Significant Effects (LSEs) on sensitive Habitats Sites may arise due to implementation of the Plan.

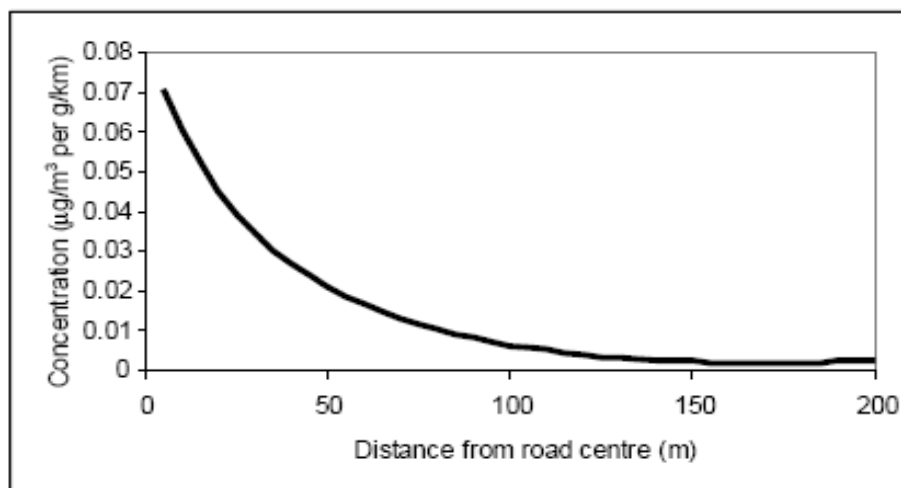


Figure 4: Traffic contribution to concentrations of pollutants at different distances from a road (Source: DfT⁵⁹)

- 4.5 Overall, the following Habitats Sites are considered potentially sensitive to atmospheric nitrogen deposition, primarily due to the presence of nutrient-limited habitats and are taken forward into screening:
- Ashdown Forest SAC (approximately 15 km to the west of the Rother district boundary), and
 - Dungeness SAC (within and to the east of the Rother district boundary),
 - Dungeness, Romney Marsh and Rye Bay SPA and Ramsar sites (within and to the east of the Rother district boundary),
 - Hastings Cliffs SAC (Adjacent to the Rother district boundary),
 - Lewes Downs SAC (approximately 22 km to the west of the Rother district boundary).
- 4.6 The Pevensy Levels SAC and Ramsar interest features are not sensitive to atmospheric ammonia, NO_x or nitrogen deposition. This is supported by reference to the UK Air Pollution Information System which does not list any interest features of the SAC as being sensitive to atmospheric nitrogen deposition, NO_x or ammonia. It is also noted that the Site Improvement Plan produced by Natural England does not mention air quality as a concern and AECOM understands from personal communication from Natural England officers that they do not see atmospheric nitrogen deposition as a risk to the integrity of this site. The Pevensy Levels SAC is designated for its population of lesser ramshorn whirlpool snail (*Anisus vorticulus*), while the Ramsar site is designated for both this snail and a range of other internationally important aquatic invertebrates and aquatic plants in

⁵⁷ The critical load is the rate of deposition beyond which research indicates that adverse effects can reasonably be expected to occur.

⁵⁸ Available at: <http://www.dft.gov.uk/webtag/documents/expert/unit3.3.3.php#013> [Accessed on the 21/10/2021]

⁵⁹ Available at: <http://www.dft.gov.uk/ha/standards/dmrb/vol11/section3/ha20707.pdf> [Accessed on the 21/10/2021]

the ditch network on site. The site also provides habitat for breeding and wintering birds but these are not a reason for Ramsar designation.

- 4.7 While eutrophication (excessive vegetation growth from nutrient enrichment) is a risk, the ditches of the Pevensey Levels (like most freshwater bodies) are understood to be 'phosphate-limited', meaning that phosphate is the most important nutrient to control. Phosphate does not derive from atmosphere but does come in large volumes from agricultural runoff and treated sewage effluent.

Functionally Linked Habitat

- 4.8 While most Habitats Sites have been geographically defined to encompass the key features that are necessary for coherence of their structure and function, and the support of their qualifying features, this is not necessarily the case. A diverse array of qualifying species including birds, bats and amphibians are not always confined to the boundary of designated sites.
- 4.9 For example, the highly mobile nature of both wader and waterfowl species implies that areas of habitat of crucial importance to the integrity of their populations lie outside the physical limits of Habitats Sites. Despite not being part of the formal designation, these habitats are integral to the maintenance of the structure and function of the designated site, for example by encompassing important foraging grounds. Therefore, land use plans that may affect such functionally linked habitat require further assessment.
- 4.10 There is now an abundance of authoritative examples of HRA cases on plans affecting bird populations, where Natural England the potential importance of functionally linked land. For example, bird surveys in relation to a previous HRA established that approximately 25% of the golden plover population in the Somerset Levels and Moors SPA were affected while on functionally linked land, and this required the inclusion of mitigation measures in the relevant plan policy wording. Another important case study originates from the Mersey Estuary SPA / Ramsar, where adjacently located functionally linked land had a peak survey count of 108% of the 5-year mean peak population of golden plover. This finding led to considerable amendments in the planning proposal to ensure that the site integrity was not adversely affected.
- 4.11 Generally, the identification of an area as functionally linked habitat is not always a straightforward process. The importance of non-designated land parcels may not be apparent and thus might require the analysis of existing data sources (e.g. Bird Atlases or data from records centres) to be firmly established. In some instances, data may not be available at all, requiring further survey work.
- 4.12 Overall, the available baseline information suggests that the following Habitats Sites are sensitive to the loss of functionally linked habitats due to the presence of mobile waterfowl and are taken forward into screening:
- Dungeness, Romney Marsh and Rye Bay SPA and Ramsar sites (within and to the east of the Rother district boundary).

Recreational Pressure

- 4.13 There is concern over the cumulative impacts of recreation on key nature conservation sites in the UK, as most sites must fulfill conservation objectives while also providing recreational opportunity. Various research reports have provided compelling links between changes in housing and access levels⁶⁰, and impacts on Habitats protected sites^{61 62}. This

⁶⁰ Weitowitz D.C., Panter C., Hoskin R. & Liley D. (2019). The effect of urban development on visitor numbers to nearby protected nature conservation sites. *Journal of Urban Ecology* 5. <https://doi.org/10.1093/jue/juz019>

⁶¹ Liley D, Clarke R.T., Mallord J.W., Bullock J.M. (2006a). The effect of urban development and human disturbance on the distribution and abundance of nightjars on the Thames Basin and Dorset Heaths. Natural England / Footprint Ecology.

⁶² Liley D., Clarke R.T., Underhill-Day J., Tyldesley D.T. (2006b). Evidence to support the appropriate Assessment of development plans and projects in south-east Dorset. Footprint Ecology / Dorset County Council.

applies to any habitat, but recreational pressure from housing growth is of particular significance for Habitats Sites designated for their bird interest. Different Habitats Sites are subject to different types of recreational pressures and have different vulnerabilities. Studies across a range of species have shown that the effects from recreation can be complex. HRAs of planning documents tend to focus on recreational sources of disturbance as a result of new residents⁶³.

Trampling Damage, Nutrient Enrichment and Wildfires

4.14 Most terrestrial habitats (especially heathland, woodland and dune systems) can be affected by trampling and other mechanical damage, which dislodges individual plants, leads to soil compaction and erosion. The following studies have assessed the impact of trampling associated with different recreational activities in different habitats:

- Wilson & Seney⁶⁴ examined the degree of track erosion caused by hikers, motorcyclists, horse riders and cyclists in 108 plots along tracks in the Gallatin National Forest, Montana. Although the results proved difficult to interpret, it was concluded that horses and hikers disturbed more sediment on wet tracks, and therefore caused more erosion, than motorcycles and bicycles.
- Cole et al⁶⁵ conducted experimental off-track trampling in 18 closed forest, dwarf scrub and meadow & grassland communities (each trampled between 0 – 500 times) over five mountain regions in the US. Vegetation cover was assessed two weeks and one year after trampling, and an inverse relationship with trampling intensity was discovered, although this relationship was weaker after one year than two weeks indicating some recovery of the vegetation. Differences in plant morphology was found to explain more variation in response than soil and topographic factors. Low-growing, mat-forming grasses regained their cover best after two weeks and were considered most resistant to trampling, while tall forbs (non-woody vascular plants other than grasses, sedges, rushes and ferns) were considered least resistant. The cover of hemicryptophytes and geophytes (plants with buds below the soil surface) was heavily reduced after two weeks but had recovered well after one year and as such these were considered most resilient to trampling. Chamaephytes (plants with buds above the soil surface) were least resilient to trampling. It was concluded that these would be the least tolerant of a regular cycle of disturbance.
- Cole⁶⁶ conducted a follow-up study (across four vegetation types) in which shoe type (trainers or walking boots) and trampling weight were varied. Although immediate damage was greater with walking boots, there was no significant difference after one year. Heavier trampers caused a greater reduction in vegetation height than lighter trampers, but there was no differential impact on vegetation cover.
- Cole & Spildie⁶⁷ experimentally compared the effects of off-track trampling by hikers and horse riders (at two intensities – 25 and 150 passes) in two woodland vegetation types (one with an erect forb understorey and one with a low shrub

⁶³ The RTP1 report 'Planning for an Ageing Population' (2004) which states that 'From being a marginalised group in society, the elderly are now a force to be reckoned with and increasingly seen as a market to be wooed by the leisure and tourist industries. There are more of them and generally they have more time and more money.' It also states that 'Participation in most physical activities shows a significant decline after the age of 50. The exceptions to this are walking, golf, bowls and sailing, where participation rates hold up well into the 70s'.

⁶⁴ Wilson, J.P. & J.P. Seney. (1994). Erosional impact of hikers, horses, motorcycles and off-road bicycles on mountain trails in Montana. *Mountain Research and Development* **14**:77-88

⁶⁵ Cole, D.N. (1995a). Experimental trampling of vegetation. I. Relationship between trampling intensity and vegetation response. *Journal of Applied Ecology* **32**: 203-214

Cole, D.N. (1995b). Experimental trampling of vegetation. II. Predictors of resistance and resilience. *Journal of Applied Ecology* **32**: 215-224

⁶⁶ Cole, D.N. (1995c). Recreational trampling experiments: effects of trampler weight and shoe type. Research Note INT-RN-425. U.S. Forest Service, Intermountain Research Station, Utah.

⁶⁷ Cole, D.N., Spildie, D.R. (1998). Hiker, horse and llama trampling effects on native vegetation in Montana, USA. *Journal of Environmental Management* **53**: 61-71

understorey). Horse trampling was found to cause the largest reduction in vegetation cover. The forb-dominated vegetation suffered greatest disturbance but recovered rapidly. Generally, it was shown that higher trampling intensities caused more disturbance.

- In heathland sites, trampling damage can affect the value of a site to wildlife. For example, heavy use of sandy tracks loosens and continuously disturbs sand particles, reducing the habitat's suitability for invertebrates⁶⁸. Species that burrow into flat surfaces such as the centres of paths, are likely to be particularly vulnerable, as the loose sediment can no longer maintain their burrow. In some instances, nature conservation bodies and local authorities resort to hardening paths to prevent further erosion. However, this is concomitant with the loss of habitat used by wildlife, such as sand lizards and burrowing invertebrates.
- 4.15 A major concern for nutrient-poor terrestrial habitats (e.g. heathlands, sand dunes, bogs and fens) is nutrient enrichment associated with dog fouling (addressed in various reviews, e.g.⁶⁹). It is estimated that dogs will defecate within 10 minutes of starting a walk and therefore most nutrient enrichment arising from dog faeces will occur within 400m of a site entrance. In contrast, dogs will urinate at frequent intervals during a walk, resulting in a wider distribution of urine. For example, in Burnham Beeches National Nature Reserve it is estimated that 30,000 litres of urine and 60 tonnes of dog faeces are deposited annually⁷⁰. While there is limited information on the chemical constituents of dog faeces, nitrogen is one of the main components⁷¹. Nutrient availability is the major determinant of plant community composition and the effect of dog defecation in sensitive habitats is comparable to a high-level application of fertiliser, potentially resulting in a shift towards plant communities that are more typical of improved grasslands.

Bird Disturbance

- 4.16 Human activity can affect birds either directly (e.g. by eliciting flight responses) or indirectly (e.g. by damaging habitat or reducing bird fitness in less obvious ways such as through inducing stress responses). The most obvious direct effect is that of immediate mortality such as death by shooting, but human activity can also lead to much subtler behavioural (e.g. alterations in feeding behaviour, avoidance of certain areas and use of sub optimal areas etc.) and physiological changes (e.g. an increase in heart rate). While such changes are less noticeable, they might result in major population-level changes by altering the balance between immigration / birth and emigration / death⁷².
- 4.17 Concern regarding the effects of disturbance on birds stems from the fact that they are expending energy unnecessarily and time spent responding to disturbance is time that is not spent feeding⁷³. Disturbance therefore increases energetic expenditure while reducing energetic intake, which can adversely affect the 'condition' and ultimately survival of birds. Additionally, displacement of birds from one feeding site to another can increase the pressure on the resources available within alternative foraging sites, which must sustain a greater number of birds⁷⁴. Moreover, the higher proportion of time a breeding bird spends away from its nest, the more likely it is that eggs will cool and the more vulnerable they, or any nestlings, are to predators. Recreational effects on ground-nesting birds are

⁶⁸ Taylor K., Anderson P., Liley D. & Underhill-Day J.C. (2006). Promoting positive access management to sites of nature conservation value: A guide to good practice. English Nature / Countryside Agency, Peterborough and Cheltenham.

⁶⁹ Taylor K., Anderson P., Taylor R.P., Longden K. & Fisher P. (2005). Dogs, access and nature conservation. English Nature Research Report, Peterborough.

⁷⁰ Barnard A. (2003). Getting the facts – Dog walking and visitor number surveys at Burnham Beeches and their implications for the management process. *Countryside Recreation* 11:16-19.

⁷¹ Taylor K., Anderson P., Liley D. & Underhill-Day J.C. (2006). Promoting positive access management to sites of nature conservation value: A guide to good practice. English Nature / Countryside Agency, Peterborough and Cheltenham.

⁷² Riley, J. (2003). Review of Recreational Disturbance Research on Selected Wildlife in Scotland. Scottish Natural Heritage.

⁷³ Riddington, R. *et al.* (1996). The impact of disturbance on the behaviour and energy budgets of Brent geese. *Bird Study* 43:269-279.

⁷⁴ Gill, J.A., Sutherland, W.J. & Norris, K. (1998). The consequences of human disturbance for estuarine birds. *RSPB Conservation Review* 12: 67-72.

particularly severe, with many studies concluding that urban sites support lower densities of key species, such as stone curlew and nightjar^{75 76}.

- 4.18 Several factors (e.g. seasonality, type of recreational activity) may have pronounced impacts on the nature of bird disturbance. Disturbance in winter may be more impactful because food shortages make birds more vulnerable at this time of the year. In contrast, this may be counterbalanced by fewer recreational users in the winter months and lower overall sensitivity of birds outside the breeding season. Evidence in the literature suggests that the magnitude of disturbance clearly differs between different types of recreational activities. For example, dog walking leads to a significantly higher reduction in bird diversity and abundance compared to hiking⁷⁷. Scientific evidence also suggests that key disturbance parameters, such as areas of influence and flush distance, are significantly greater for dog walkers than hikers⁷⁸. Furthermore, differences in on-site route lengths and usage patterns likely imply that key spatial and temporal parameters (such as the area of a site potentially impacted and the frequency of disturbance) will also differ between recreational activities. This suggests that activity type is a factor that ought to be taken into account in HRAs.

Summary

- 4.19 Habitats Sites relevant to the Rother Local Plan are designated for habitats and species that are sensitive to recreational pressure, including the Ashdown Forest SAC (supports parcels of dry and wet heathland), Ashdown Forest SPA (supports nightjar and Dartford warbler, which nest on or close to the ground), Dungeness Complex (designated for habitats sensitive to trampling, waterfowl and waders and foraging seabirds) and Lewes Downs SAC (designated for semi-natural dry grassland and scrubland). The identified and potential sites for residential development in the Draft (Regulation 18) RLP will lead to an increase in the local population and demand for access to outdoor spaces. The HRA process needs to adequately assess potential recreational pressure effects of the Plan on these Habitats Sites.
- 4.20 The following Habitats Sites that could potentially link to the Draft (Regulation 18) RLP are sensitive to increased recreational access, due to the allocation of residential development and are taken forward into screening:
- Ashdown Forest SAC/SPA (at approximately 15 km distance from the Rother district boundary).
 - Lewes Downs SAC (at approximately 22 km distance from the Rother district boundary).
 - Dungeness SAC (within and to the east of the Rother district boundary),
 - Dungeness, Romney Marsh and Rye Bay SPA and Ramsar sites (within and to the east of the Rother district boundary).

Water Quality

- 4.21 The impacts on water quality for the Pevensey levels have been assessed on the basis of the operational catchment areas defined in DEFRA's Data Catchment Explorer. The appropriate management catchment is "Cuckmere and Pevensey Levels Management Catchment" which consists of three operational catchments, identified sites within the Pevensey Levels hydrological catchment have been assessed. Those within the Combe Haven and Cuckmere Upper hydrological catchments have not been assessed in respect

⁷⁵ Clarke R.T., Liley D., Sharp J.M., Green R.E. (2013). Building development and roads: Implications for the distribution of stone curlews across the Brecks. *PLOS ONE*. <https://doi:10.1371/journal.pone.0072984>.

⁷⁶ Liley D. & Clarke R.T. (2003). The impact of urban development and human disturbance on the numbers of nightjar *Caprimulgus europaeus* on heathlands in Dorset, England. *Biological Conservation* **114**: 219-230.

⁷⁷ Banks P.B., Bryant J.Y. (2007). Four-legged friend or foe? Dog walking displaces native birds from natural areas. *Biology Letters* **3**: 14pp.

⁷⁸ Miller S.G., Knight R.L., Miller C.K. (2001). Wildlife responses to pedestrians and dogs. *Wildlife Society Bulletin* **29**: 124-132.

of the Pevensey Habitats Sites as they do not drain into the Pevensey Levels. This differs from the approach taken in the DaSa and reflects the potential (or lack of) to impact the Pevensey Habitat Sites.

- 4.22 The quality of the water that feeds Habitats Sites is an important determinant of the nature of their habitats and the species they support. Poor water quality can have a range of environmental impacts:
- At high levels, toxic chemicals and metals can result in immediate death of aquatic life, and can have detrimental effects even at lower levels, including increased vulnerability to disease and changes in wildlife behaviour.
 - Eutrophication, the enrichment of plant nutrients in water, increases plant growth and consequently results in oxygen depletion. Algal blooms, which commonly result from eutrophication, increase turbidity and decrease light penetration. The decomposition of organic wastes that often accompanies eutrophication deoxygenates water further, augmenting the oxygen depleting effects of eutrophication. In the marine environment, nitrogen is the limiting plant nutrient and so eutrophication is associated with discharges containing available nitrogen.
 - Some pesticides, industrial chemicals, and components of sewage effluent are suspected to interfere with the functioning of the endocrine system, possibly having negative effects on the reproduction and development of aquatic life.
- 4.23 The main risk associated with the Draft (Regulation 18) RLP is the discharge of treated sewage effluent (or untreated sewage effluent released during exceptional periods of heavy rain) from Wastewater Treatment Works (WwTWs) serving the district. This could increase the nutrient concentrations (both nitrogen and phosphorus) in Habitats Sites that are hydrologically linked to waterbodies that receive treated wastewater.
- 4.24 The Draft (Regulation 18) RLP assessed in this HRA provides for development in the area served by Southern Water, responsible for the public water supply and wastewater treatment in large areas of south and south-east England.
- 4.25 Overall, the following Habitats Sites are considered to be sensitive to negative changes in water quality and are taken forward into screening:
- Dungeness, Romney Marsh and Rye Bay SPA / Ramsar (water quality is not specifically listed as a threat or pressure for this site, however eutrophication has the potential to impact the inland grazing marshes and reed beds in particular)
 - Pevensey Levels SAC / Ramsar

Water Quantity, Level and Flow

- 4.1 The impacts on water quantity, level and flow for the Pevensey levels have been assessed on the basis of the operational catchment areas defined in DEFRA's Data Catchment Explorer. The appropriate management catchment is "Cuckmere and Pevensey Levels Management Catchment" which consists of three operational catchments, identified sites within the Pevensey Levels hydrological catchment have been assessed. Those within the Combe Haven and Cuckmere Upper operational catchments have not been assessed in respect of the Pevensey Habitats Sites as they do not drain into the Pevensey Levels. This differs from the approach taken in the DaSa and reflects the potential (or lack of) to impact the Pevensey Habitat Sites.
- 4.2 The unique nature of wetlands combines shallow water, high levels of nutrients and high primary productivity. These conditions are ideal for the growth of organisms at the basal level of food webs, which feed many species of birds, mammals, fish and amphibians. Overwintering and migrating wetland bird species are particularly reliant on these food sources, as they need to build up enough nutritional reserves to sustain their long migration routes.

- 4.3 Maintaining a steady water supply is of critical importance for many hydrologically dependent SPAs, SACs and Ramsars. For example, in many wetlands winter flooding is essential for sustaining a variety of foraging habitats for SPA / Ramsar wader and waterbird species. However, different species vary in their requirements for specific water levels. Splash and / or shallow flooding is required to provide suitable feeding areas and roosting sites for ducks and waders. In contrast, deeper flooding is essential to provide foraging habitats for Bewick's swans and other ducks.
- 4.4 Wetland habitats rely on hydrological connections with other surface waters, such as rivers, streams and lakes. A constant supply of water is fundamental to maintaining the ecological integrity of sites. However, while the natural fluctuation of water levels within narrow limits is desirable, excess or too little water supply might cause the water level to be outside of the required range of qualifying birds, invertebrate or plant species. This might lead to the loss of the structure and functioning of wetland habitats. There are two mechanisms through which urban development might negatively affect the water level in Habitats Sites:
- The supply of new housing with potable water will require increased abstraction of water from surface water and groundwater bodies. Depending on the level of water stress in the geographic region, this may reduce the water levels in Habitats Sites sharing the same catchment.
 - The proliferation of impermeable surfaces in urban areas increases the volume and speed of surface water runoff. As traditional drainage systems often cannot cope with the volume of stormwater, sewer overflows are designed to discharge excess water directly into watercourses. Often this pluvial flooding results in downstream inundation of watercourses and the potential flooding of wetland habitats.
- 4.5 Specifically, the Site Improvement Plans for the Pevensey Levels SAC and the Dungeness, Romney Marsh and Rye Bay SPA / Ramsar ⁷⁹ identify inappropriate water levels as threats to the respective sites. Increases to the quantity and rate of water delivery can result in summer flooding and prolonged / deeper winter flooding. This in turn results in the reduction of feeding and roosting sites for birds. For example, in areas where water is too deep, most waders will be unable to reach their food sources close to the ground.
- 4.6 The emerging Draft (Regulation 18) RLP could result in changes to the water quantity, level and flow in the catchment of several Habitats Sites if it required additional abstraction from such sites. This could alter the water level within the designated sites themselves with potential cascading effects on qualifying species. Overall, the following Habitats Sites are considered to be sensitive to changes in water quantity, level and are taken forward to screening:
- Dungeness, Romney Marsh and Rye Bay SPA / Ramsar
 - Pevensey Levels SAC / Ramsar

⁷⁹ <http://publications.naturalengland.org.uk/publication/6561001356918784> [Accessed 29/02/2024]

5. Screening for Likely Significant Effects (LSEs)

Atmospheric Pollution (Nitrogen Deposition)

Ashdown Forest SPA / SAC

- 5.1 Ashdown Forest SAC is primarily designated for its extensive, continuous block of lowland heathland, comprising northern wet heath with *Erica tetralix* and European dry heath. This supports the birds of the SPA. The Air Pollution Information System (APIS) identifies both habitats as being sensitive to atmospheric pollution with a nitrogen Critical Load (CL) of 5-15 kg N/ha/yr. An exceedance of the CL may lead to a change in botanical community composition, favouring more competitive grasses over heather species. High nitrogen concentrations can also make ericaceous species more susceptible to impacts from frost and drought. In dry heaths, elevated nitrogen levels may lead to a decline in lichens and changes in plant biochemistry. The current deposition trends for the SAC indicate that the minimum CL is already being exceeded, with maximum background nitrogen deposition in the 5km grid squares within which the SAC is situated being 14.6 kg N/ha/yr. The deposition rate will be greater than this close to roads.
- 5.2 Several studies have been previously commissioned to consider the impact of traffic associated with new housing and employment development at Ashdown Forest. For example, an Air Quality Monitoring and Modelling Study⁸⁰ was undertaken by Air Quality Consultants on behalf of Wealden District Council in 2018, which highlighted that the annual mean critical levels for both NH₃ and NO_x are being exceeded in close proximity to roads traversing the SAC. However, it has generally been difficult to attribute variation in these habitats, primarily due to a range of confounding variables such as grazing management, visitor pressure and other roadside physical disturbances (e.g. salt spray, particulates and debris). Another study undertaken by ECUS⁸¹ on behalf of Wealden District Council, investigated ecological impacts caused by nitrogen deposition along 15 road transects in the Ashdown Forest SAC.
- 5.3 The study⁸² determined that the transects showed low overall species richness, which tended to decline with distance from road (in other words diversity was greater closer to the road than more distant, the opposite of what one might expect if nitrogen deposition were the main factor governing vegetation composition). Furthermore, there was no correlation between soil total nitrogen levels with distance from road, implying that road traffic alone clearly does not account for soil chemistry variation and species composition. As a general rule, undergrazing and inadequate management is the primary reason more of this site does not support good quality heathland. Roads can have a significant effect, but their effect will be felt closest to the road which is generally the habitat less representative of SAC features and is affected by a range of other factors controlling vegetation composition, known as edge effects. Away from the roadside, agriculture makes the greatest contribution to nitrogen deposition across the SAC. Notwithstanding this, atmospheric pollution from road traffic clearly continues to be a contributing threat to the integrity of the Ashdown Forest SAC and requires particular attention in HRAs of Local Plans.

⁸⁰<https://www.wealden.gov.uk/UploadedFiles/Ashdown-Forest-Air-Quality-Monitoring-and-Modelling-August-2018-Volume-1.pdf> [Accessed Feb 2024]

⁸¹https://www.wealden.gov.uk/UploadedFiles/Ecological_Monitoring_At_Ashdown_Forest_Appendices.pdf [Accessed Feb 2024]

⁸²ibid

- 5.4 The critical load for nitrogen is already exceeded across Ashdown Forest SAC. With regard to this fact the following are relevant:
- Paragraph 5.26 of the Natural England guidance on the issue⁸³ states that ‘*An exceedance [of the critical level or load] alone is insufficient to determine the acceptability (or otherwise) of a project*’. So, the fact that the critical level for NOx or ammonia, or critical load for nitrogen are already exceeded is not a legitimate basis to conclude that any further NOx, ammonia, or nitrogen (no matter how small) will result in an adverse effect;
 - Paragraph 4.25 of the same guidance states ‘*...1% of critical load/level are considered by Natural England’s air quality specialists (and by industry, regulators and other statutory nature conservation bodies) to be suitably precautionary, as any emissions below this level are widely considered to be imperceptible...There can therefore be a high degree of confidence in its application to screen for risks of an effect*’.
- 5.5 The SAC sits entirely within Wealden District approximately 15 km to the west of Rother and is traversed by several potential commuter roads, including the A275, A22 and A26 as well as smaller routes that provide direct connections across the SAC. Review of habitat mapping on MAGIC.gov.uk indicates that extensive fragments of heathland are located very close to all these roads, within the 200m screening distance for roadside atmospheric pollution effects from vehicular traffic. These roads may form key routes for commuters travelling to / from Wealden District, or other authorities.
- 5.6 Natural England’s Site Improvement Plan⁸⁴ highlights atmospheric pollution as a pressure to the integrity of the SAC (second to inadequate land management), with parts of the site experiencing declines in heather coverage and becoming increasingly dominated by grasses, although the Supplementary Advice on the Conservation Objectives⁸⁵ identify the significant role of agriculture as a source of nitrogen.
- 5.7 The average vehicle journey made in the UK is 10.6km⁸⁶. Ashdown Forest sits outside a 10km buffer zone around the Rother District and there are no arterial roads connecting the SAC with development sites within the district.
- 5.8 Traffic modelling undertaken by Rother District Council for the adopted DaSA estimated a total net change in Annual Average Daily Traffic (AADT) through Ashdown Forest SAC/SPA from the A26 and A22 combined of less than 20 AADT attributable to commuting trips. This is unlikely to be materially different for the new Local Plan. This is unsurprising given that the main settlement in Rother District (Bexhill) is 30km from Ashdown Forest SAC/SPA, while the district’s other towns, Battle and Rye, are 37km and 57km distant respectively. Even if there were also some social and leisure trips affecting the Ashdown Forest (though these distances would suggest this negligible), a change this small to 24hr AADT flows through, or adjacent to, a Habitats site is very unlikely to materially alter any air quality modelling results (and thus ecological effects) for three reasons:
- Firstly, daily traffic flows are not fixed numerals but fluctuate from day to day. The AADT for a given road is an annual average (specifically, the total volume of traffic for a year, divided by 365 days). It is this average number that is used in air quality modelling, but the ‘true’ flows on a given day will vary around this average figure. Small changes in average flow will lie well within normal variation (known as the standard deviation or variance) and would not make a statistically significant difference in the total AADT.
 - Secondly, when converted into NOx concentrations, ammonia concentrations or nitrogen deposition rates, very small changes in AADT would only affect those

⁸³ ‘Natural England’s approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations. Version: June 2018’. <http://publications.naturalengland.org.uk/publication/4720542048845824>

⁸⁴ Available at: <https://publications.naturalengland.org.uk/file/6679502935556096> [Accessed on the 12/12/2023]

⁸⁵ Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0030080.pdf> [Accessed on 12/12/2023]

⁸⁶ GOV.UK (2019). Average number of trips made and distance travelled. <https://www.gov.uk/government/statistical-data-sets/nts01-average-number-of-trips-made-and-distance-travelled> , accessed 13/12/2023

decimal places that are never reported in air quality modelling to avoid false precision. For this reason, nitrogen deposition is generally not reported to more than 2 decimal places at most (0.01 kgN/ha/yr). Anything smaller is simply reported as less than 0.01 (< 0.01) i.e. probably more than zero but too small to model with precision.

- Thirdly, ecological interpretation of the air quality implications of any change in flows is required. Research has identified that heathland vegetation parameters (for example) such as species richness or percentage grass cover are not sensitive to extremely small changes in nitrogen dose. Natural England Commissioned Report 210⁸⁷ reports the nitrogen dose required to achieve particular changes in heathland vegetation at a range of background deposition rates. It is clear from this report that extremely small fluctuations in nitrogen deposition, such as would result from small changes in AADT, would not materially affect the vegetation response of a given dose.
- 5.9 Great-crested newts are an Annex II qualifying feature of the SAC, which rely on freshwater ponds for reproduction, with larvae emerging between August and October. They prefer well vegetated ponds in a range of settings, including pastoral and arable farmland. Newts do not necessarily require high water quality and have very broad terrestrial habitat requirements such that their use of an area is unlikely to be affected by atmospheric nitrogen deposition.
- 5.10 **Due to the distance of the closest identified sites within the Draft (Regulation 18) RLP from Ashdown Forest SAC/SPA, they are unlikely to result in a material increase in commuter journeys being undertaken within 200m of the sensitive heathland of the SAC. Therefore, Likely Significant Effects (LSEs) can be excluded, and the site is screened out for Appropriate Assessment regarding atmospheric pollution (nitrogen deposition).**

Dungeness Complex

- 5.11 The Dungeness Complex (includes the Ramsar, SPA and SAC designations) is designated for annual vegetation of drift lines and perennial vegetation of stony banks. Natural England's Site Improvement Plan (SIP) lists the impact of atmospheric nitrogen deposition as a threat to "H1220 Perennial vegetation of stony banks" with a stated measure to "control, reduce and ameliorate atmospheric nitrogen impacts". APIS identifies this habitat as having a minimum Critical Load of 5 kgN/ha/yr. Other habitats which are present within the SAC or SPA and Ramsar site (such as Coastal and Floodplain Grazing Marsh) have a Critical Load of 10-20 kg N/ha/year. The current deposition trends for the SAC/SPA indicate a maximum background nitrogen deposition in the 5km grid squares within which the SAC is situated being 12.9 kg N/ha/yr. The deposition rate is greatest close to roads.
- 5.12 The habitats of Dungeness SAC are very localised and there are no significant roads within 200m of the SAC that would experience a material change in Annual Average Daily Traffic due to housing and employment growth in Rother. With regard to the grazing marsh habitat of the SPA, a review of the road network shows that a potential commuter route (A259) runs through parts of the SPA / Ramsar site, notably in the vicinity of East Guldeford east of Rye, and between Rye and Winchelsea. APIS identifies the following species to be potentially vulnerable to nitrogen deposition on their habitats, and those habitats are present within 200m of the A259: Aquatic warbler, bittern, marsh harrier, golden plover and Mediterranean gull. This list does not include those species where impacts could be both positive and negative and thus balance.
- 5.13 **The Draft (Regulation 18) RLP will increase the population and employment opportunities within the district, likely resulting in more commuter journeys being undertaken within 200m of sensitive SPA/Ramsar areas. Therefore, Likely**

⁸⁷ CAPORN, S., FIELD, C., PAYNE, R., DISE, N., BRITTON, A., EMMETT, B., JONES, L., PHOENIX, G., S POWER, S., SHEPPARD, L. & STEVENS, C. 2016. Assessing the effects of small increments of atmospheric nitrogen deposition (above the critical load) on semi-natural habitats of conservation importance. Natural England Commissioned Reports, Number 210.

Significant Effects (LSEs) cannot be excluded, and the site is screened in for Appropriate Assessment regarding this atmospheric pollution (nitrogen deposition).

- 5.14 The following proposed policies contained in the Draft (Regulation 18) RLP are screened in for Appropriate Assessment in relation to atmospheric pollution, primarily because they may increase the number of commuter journeys within 200m of sensitive heathland in the Ashdown Forest SPA / SAC:
- Proposed Strategy: Overall Spatial Development and identified residential and employment sites associated with the strategy.
 - Proposed Strategy: Sites for Gypsies, Travellers and Travelling Showpeople (23 pitches)
- 5.15 Great-crested newts are an Annex II qualifying feature of the Dungeness SAC, which rely on freshwater ponds for reproduction, with larvae emerging between August and October. They prefer well vegetated ponds in a range of settings, including pastoral and arable farmland. Newts do not necessarily require high water quality and have very broad terrestrial habitat requirements such that their use of an area is unlikely to be affected by atmospheric nitrogen deposition.

Hastings Cliffs SAC

- 5.16 Hastings Cliffs SAC is designated for “vegetated sea cliffs of the Atlantic and Baltic coasts”. Natural England’s Site Improvement Plan (SIP) lists the impact of atmospheric nitrogen deposition as a threat and notes the requirement for further investigation into the impacts of atmospheric nitrogen on the site.
- 5.17 APIS gives the Critical Load for Maritime Cliff and Slopes as 20-30 kg N/ha/year, with potential impacts of and increase in graminoid (grass) biomass and a loss of sensitive lichen species. A review of the road network shows that a potential commuter route (A259) runs close to the SAC; however it is 360m away at its closest point. of the SAC. Therefore, road traffic arising from Rother will not contribute to nitrogen deposition across the SAC.
- 5.18 **LSEs of the Draft (Regulation 18) RLP on the Hastings Cliffs SAC regarding atmospheric pollution can be excluded and the site is screened out from Appropriate Assessment in relation to atmospheric pollution (nitrogen deposition).**

Lewes Downs SAC

- 5.19 Lewes Downs SAC is designated for Semi-natural dry grasslands and scrubland facies on calcareous substrates. Natural England’s Site Improvement Plan (SIP) list atmospheric nitrogen deposition as a threat to with a stated measure to “control, reduce and ameliorate atmospheric nitrogen impacts”. APIS gives a Critical Load of 10-20 kg N/ha/year, for the designated feature, Semi-natural dry grasslands and scrubland facies on calcareous substrates (*Festuco-Brometalia*).
- 5.20 The average vehicle journey made in the UK is 10.6km⁸⁸. Lewes Downes SAC sits well outside the 10km buffer zone around the Rother District and there are no arterial roads connecting the SAC with development sites within the district. A review of the road network shows that a potential commuter route runs directly adjacent to parts of the SAC and connects directly to allocated commercial and residential development sites within the Bexhill Parish; however, the distance to the part of the A26 within 200m of the SAC is 28km away, more than twice the average vehicle journey. As with Ashdown Forest, it is very likely that commuting journeys from new development in Rother will have a negligible impact on annual average daily traffic on the A26 past the SAC.
- 5.21 **The distance from proposed new sites in the Draft (Regulation 18) RLP makes any impact unlikely. Therefore, Likely Significant Effects (LSEs) can be excluded, and**

⁸⁸ GOV.UK (2019). Average number of trips made and distance travelled. <https://www.gov.uk/government/statistical-data-sets/nts01-average-number-of-trips-made-and-distance-travelled> , accessed 13/12/2023

the site is screened out for Appropriate Assessment regarding atmospheric pollution (nitrogen deposition).

Summary

5.22 The following Habitats Site is taken forward to Appropriate Assessment in Chapter 6 with regard to atmospheric pollution:

- Dungeness Complex of sites

Functionally Linked Habitat

Dungeness, Romney Marsh and Rye Bay SPA / Ramsar

- 5.23 The qualifying features of the SPA and Ramsar sites includes a number of waterfowl known to utilise inland habitats, particularly at high tide for example, Golden Plover (*Pluvialis apricaria*). Golden plovers utilise marine, intertidal, arable, heath, wetland and grassland habitats which are in abundance close to the Dungeness and Romney Marsh sites.
- 5.24 The SPA and/or Ramsar was specifically extended to include all significant areas of functionally-linked improved grassland and marshland within 12-13km of the coast. Additional extensive arable land is present and while not protected as a habitat site no changes are proposed to its existing use.
- 5.25 Identified sites proposed for development with close proximity of the Ramsar (5 km) are restricted to existing urban areas with low suitability as functionally linked habitat. None of the identified sites are within 10 km of Dungeness point itself.
- 5.26 **The extensive habitats which have the potential to be functionally linked for the designated birds are either protected as elements of the SPA / Ramsar or retain their existing usage with no impact from identified sites. Therefore, Likely Significant Effects (LSEs) can be excluded, and the site is screened out for Appropriate Assessment regarding atmospheric pollution (nitrogen deposition).**

Recreational Pressure

Ashdown Forest SAC

- 5.27 The heathland habitats for which the forest is designated are potentially sensitive to trampling damage. Increases in populations (as would be expected following increases in available housing) close to a Habitats Site are linked to increase visitor numbers. However, visitor surveys undertaken⁸⁹ at the SAC between 2016 and 2021 have identified a core recreational catchment of 7km.
- 5.28 The Ashdown Forest SAC is 15 km from the Rother District at its closest point and it is reasonable therefore to draw the conclusion that it is outside of the zone of influence for recreational disturbance resulting from increases in population in the Rother district. This conclusion is previously accepted by Natural England in relation to the Ashdown Forest SPA.
- 5.29 **Overall, LSEs of the Draft (Regulation 18) RLP on the Ashdown Forest SAC relating to recreational pressure can be excluded and the site is screened out from Appropriate Assessment in relation to recreational pressure.**

Dungeness Complex

- 5.30 The Draft (Regulation 18) RLP identified sites that could potentially deliver 5,158 to 7,2876 residential units in the Rother District. This increase in the local population will be

⁸⁹ <https://www.midsussex.gov.uk/media/8433/ashdown-forest-visitor-survey-report-7th-march-2022.pdf> [accessed 13/02/2024]

associated with an increased pressure on nearby recreational resources, including the Dungeness Complex which lies within the east of the Rother District.

- 5.31 Qualifying breeding birds (Mediterranean gulls, common terns and little terns) nest in shallow scrapes on beaches making them particularly susceptible to recreational disturbance, particularly by visitors who walk their dogs off lead. These species nest on or close to the ground and disturbance can lead to reduced time spent incubating eggs, provisioning for chicks, increased energy expenditure and, in the case of prolonged disturbance, abandonment of eggs. Recreational trampling can also lead to the destruction of eggs and killing of chicks. Natural England's SIP identifies public access as potentially impacting breeding birds in the SPA and that a strategic approach to visitor access management is required. The qualifying wintering species Bewick's swan and shoveler are also susceptible to disturbance from recreational users of the beach and the qualifying coastal shingle vegetation is susceptible to trampling damage.
- 5.32 The Dungeness Complex Sustainable Access and Recreation Management Strategy (SARMS) visitor assessment⁹⁰, shows the complex as an attractive and compelling destination, drawing visitors from a large geographical catchment. 70% of visitors were day-trippers or local residents with the remainder 30% being on holiday. 20% of visitors are regular visitors and 66% of those do so for the purpose of walking their dog(s). Almost all (90%) regular visitors (those who visit one or more times a week) were from the districts of Rother and Shepway (now Folkestone & Hythe). Therefore, it can be reasonably expected that residential growth in the district would result in increased visitor numbers and disturbance in the Complex.
- 5.33 The majority of the 90% of regular visitors are clustered in particular areas, most notably in and around:
- Greatstone, Lade and Lydd-On-Sea (33% of the total of 90% of regular visitors),
 - Rye and nearby (16%)
 - Camber (15%)
 - New Romney and Littlestone (9%)
 - Lydd (8.5%)
- 5.34 The future usage of the western beach, and hence the habitat value, may also be impacted upon by proposals which reduce the number of parking spaces at the central car park and redevelop those on the former putting green site (identified sites CAM0001 and CAM0002). While the current limitations on access, locationally and seasonally, may be suitable, any such proposals that could increase use of the western foreshore in winter should be subject to a clear understanding of the nature conservation impacts and any necessary resultant management measures⁹¹.
- 5.35 **The available evidence base highlights that recreational pressure is likely to increase as a result of the increase in housing (and therefore population) within the district. Therefore, LSEs of the Draft (Regulation 18) RLP on the Dungeness Complex regarding recreational pressure cannot be excluded and these sites are screened in for Appropriate Assessment.**
- 5.36 The following proposed policies contained in the Draft (Regulation 18) RLP are screened in for Appropriate Assessment in relation to recreational pressure, primarily because they will lead to an increase in the population of the Rother District and additional demand for recreational space:
- Proposed Strategy: Overall Spatial Development Strategy: provides for residential development on identified and potential sites (5,158 to 7,287 residential units) and

⁹⁰ [Dungeness Complex Sustainable Access and Recreation Management Strategy \(SARMS\) Supporting Document 4 – Visitor Assessment](#) (2017) [Accessed online, 10/11/2023]

⁹¹ [Dungeness Complex Sustainable Access and Recreation Management Strategy \(SARMS\)](#) (2017) [Accessed online, 13/12/2023]

employment land development (78,165 – 104,399 square metres) within the Plan period.

- Proposed Strategy: Sites for Gypsies, Travellers and Travelling Showpeople (23 pitches)

5.37 As such, recreational pressure impacting upon the Dungeness complex will be taken forward to Appropriate Assessment in Chapter 6. Whilst mitigation cannot be taken into account in the Likely Significant Effects stage of HRA, it is expected that the SARMS will continue to be the mitigation solution for this impact.

Hastings Cliffs SAC

5.38 The Draft (Regulation 18) RLP allocates 4,854 to 6,688 residential units in the Rother District, which lies directly adjacent to the Hastings Cliffs SAC which is within the borough of Hastings. This increase in the local population will be associated with an enhanced pressure on nearby recreational resources, including Hastings Cliffs SAC. The SAC itself is part of the Hastings Country Park, a coastal nature reserve comprising a variety of walking trails. Since 2000, the Country Park is subject to an active management plan⁹² that aims at preserving the site's coastal acid grassland.

5.39 The 2018 Country Park leaflet advertises the main areas of interest within the park, including The Firehills (a visitor centre surrounded by two 'access for all' trails), Warren Glen, Fairlight Glen, Ecclesbourne Glen, East Hill and North's Seat. Some of these areas of interest (e.g. Fairlight Glen) are within the designated SAC. All points of interest within the Country Park are interconnected via a network of well-maintained footpaths. These paths also enable access to several viewpoints offering expansive views over the English Channel. Overall, there is little incentive for visitors to leave the footpaths and thus it is very unlikely they will damage vegetation on or near the sea cliffs. It should also be noted that much of the designated habitat is associated with the cliff face, which forms a relatively inaccessible portion of the SAC thereby providing protection to the vegetation features.

5.40 Landscape and habitat management in the Hastings Country Park is carried out by a team consisting of rangers, conservation volunteers, a conservation group (Friends of Hastings Country Park) and the local Natural England office. Since the Country Park is much larger than the Hastings Cliffs SAC, there is scope to control recreational impacts (primarily through trampling) on SAC features without limiting public access to the remainder of the Country Park. Overall, it is considered that an appropriate delivery framework and mechanism is already in place to manage a potential increase in visitor numbers to the site.

5.41 In the wider geographic area, there is also an ongoing programme for the provision of accessible natural greenspace in the form of Country Parks or Local Nature Reserves. If adequately sited such greenspaces represent realistic alternative destinations that help divert recreational pressure from more sensitive Habitats Sites, such as the Hastings Cliffs SAC. For example, a partnership between the District Councils of Rother, Hastings and East Sussex has delivered the Combe Valley Countryside Park between St. Leonards and Bexhill. The park is continually being enhanced to increase its recreational draw. Combe Valley is close by (on the other side of Hastings) and it can reasonably be expected to absorb recreational pressure from new residents in this area of the Rother District. Certainly, Rother District does not lack access to publicly accessible large countryside sites which is a relevant consideration since absence to such sites is often one of the drivers of recreational pressure on Habitats Sites.

5.42 **In conclusion, it is considered that the inaccessible nature of much of the international interest of the SAC, the already well-managed nature of the Hastings Country Park, the fact that the majority of the country park is outside the SAC and the presence of ample alternative natural greenspace in the form of the vast Combe Valley Country Park, mean that the Draft (Regulation 18) RLP will not lead to Likely**

⁹²https://www.hastings.gov.uk/content/parks_gardens_allotments/park_management/438047/Hastings_Country_Park_Nature_Reserve_Management_Plan_2020-2030.pdf [Accessed online, 10/02/2024]

Significant Effects on the Hastings Cliffs SAC through the impact pathway recreational pressure. Therefore, the impact pathway is screened out from Appropriate Assessment in relation to this site. This matches the conclusion drawn for the same SAC in the HRA of the Hastings Local Plan.

Lewes Downs SAC

- 5.43 The calcareous grasslands of the SAC are an important site for orchids which are sensitive to trampling damage. Increases in residential development and thus human population (as would be expected following increases in available housing) close to a Habitats Site can be linked to increase visitor numbers. However, Lewes Downs SAC is located 22 km from Rother District at its closest point (actual access to the SAC is further) and it is reasonable to draw the conclusion that it is outside of the zone of influence for recreational disturbance resulting from increases in population in the Rother district. **Overall, LSEs of the Draft (Regulation 18) RLP on the Lewes Downs SAC relating to recreational pressure can be excluded and the site is screened out from Appropriate Assessment in relation to recreational pressure.**

Summary

- 5.44 The following Habitats Site is taken forward to Appropriate Assessment in Chapter 6 due to recreational pressure:
- Dungeness Complex of sites

Water Quality

Dungeness, Romney Marsh and Rye Bay SPA / Ramsar

- 5.45 The southeastern edge of the Rother District includes part of the Dungeness, Romney Marsh and Rye Bay SPA / Ramsar site. The site depends on maintaining its hydrological integrity. The SPA / Ramsar comprises various features that depend on water quality, including both freshwater (phosphorus limited) and marine (nitrogen limited) habitats. Grazing marsh, the supporting habitat of many of the SPA's / Ramsar's bird species, is naturally nutrient-rich and thus relatively insensitive to nutrification. However, the Ramsar's threatened invertebrate communities and critically endangered species are likely to be more sensitive to nutrient input from treated sewage effluent.
- 5.46 Furthermore, a section of the English Channel is included in the SPA designation for its importance to foraging terns, which depend on an adequate supply of herring, sprat, sandeel, saithe, whiting and cod. While terns are known to exhibit remarkable plasticity in foraging strategies, excessive nitrogen input from treated wastewater represents a threat to their prey communities. Eutrophication of the marine environment can lead to algal blooms which affect important water quality characteristics, such as dissolved oxygen concentration and turbidity. Such changes may lead to cascading effects through the food web, impairing the ability to forage efficiently.
- 5.47 New developments from which water is treated by WwTW which are hydrologically linked to the Ramsar / SPA site have the potential to impact discharge into this Habitats Site.
- 5.48 Southern Water have produced a Drainage and Wastewater Management Plan (DWMP)⁹³ for the Rother catchment which assesses future risks to 2050 and which identifies growth and urban creep as a key issue impacting changes in risk levels⁹⁴. The following operational catchments within the Rother Management Catchment include elements of the SPA and Ramsar:

⁹³ Southern Water (2023) [Drainage and Wastewater Management Plan – Strategic Environmental Assessment](#) [Accessed online, 13/12/2023]

⁹⁴ Southern Water (2023) [Drainage and Wastewater Management Plan – Brava for the Rother Catchment](#) [Accessed online, 13/12/2023]

- Reading Cradlebridge and RMC operational catchment
 - Romney Marsh South operational catchment
 - Brede and Tillingham Operational Catchment
 - Rother Levels
- 5.49 The DWMP states that “*Catchment wastewater systems: There are 56 wastewater systems in the Rother River basin district catchment “Baseline Risk and Vulnerability Assessment (BRAVA)” identified very significant issues relating to the majority of Planning Objectives. In particular, very significant issues across multiple planning objectives were identified in Rye (RYEW) and Fairlight (FAIR), and Pollution Risk, Storm Overflow performance and Nutrient Neutrality were identified as very significant issues across several of the sewer catchments.*”.
- 5.50 The DWMP outlines investment needs and potential benefits including to “*the condition of designated sites through nutrient budget assessment and surface water removal, potential receptors include Dungeness, Romney Marsh and Rye Bay*”. Plans for the improvements are not yet available.
- 5.51 In addition to treated wastewater, development sites within c. 200m of the Habitats Site have the potential to impact water quality through surface water run-off. A number of these sites are identified in Table 4: LSE screening assessment of the proposed policies contained in the Draft (Regulation 18) RLP. Table 3.
- 5.52 **Overall, LSEs of the Draft (Regulation 18) RLP on the Dungeness, Romney Marsh and Rye Bay SPA / Ramsar regarding water quality cannot be excluded. The site is screened in for Appropriate Assessment for water quality.**
- 5.53 The following proposed policies contained in the Draft (Regulation 18) RLP are screened in for Appropriate Assessment in relation to water quality:
- Proposed Strategy: Overall Spatial Development Strategy: 6 identified or potential sites for a total of 150 residential units within 200m of the SPA/ Ramsar.
 - ECO1: Employment Floorspace Need Policy (For the period up to 2040, the Council will plan for at least 74,189sqm of additional employment floorspace). 11 identified commercial sites (total 27,748) sqm are within 200m of the SPA /Ramsar with the potential for surface water run-off.
 - Proposed Strategy: Sites for Gypsies, Travellers and Travelling Showpeople (23 pitches)

Pevensy Levels SAC / Ramsar

- 5.54 Aquatic pollution poses a significant threat to biodiversity throughout the English lowlands. The major problem is the excessive input of phosphorus (the limiting nutrient in freshwater environments) and / or nitrogen (the limiting nutrient in the marine environment) from diffuse and point sources, potentially resulting in eutrophication.
- 5.55 The Pevensy Levels SAC / Ramsar is an area of extensively grazed freshwater wet meadows, which is maintained by a network of drainage ditches. The site’s interest features, including the little whirlpool ram’s-horn snail (SAC feature) and its assemblages of freshwater molluscs, Coleoptera and Odonata (all Ramsar features) are directly dependent on the freshwater input from its catchment. As such, the phosphorus input from surface water and groundwater bodies as well as in the runoff from urban surfaces has the potential to affect the designated features through a deterioration in water quality. Freshwater habitats and species are primarily phosphate limited, whereas nitrogen is of lower importance.

- 5.56 The Pevensey Levels hydrological catchment overlaps with the Rother District in the southwest of the district. The Wastewater Treatment Works (WwTW) which discharge into the Pevensey Levels hydrological catchment area located within the Rother District are:
- Catsfield WwTW
 - Hooe WwTW
 - Lunsford Cross WwTW
- 5.57 The quantum of residential and employment development identified in the Draft (Regulation 18) RLP and associated with these WwTWs is 1500 residential units and 3,886 sqm of commercial floorspace. There is potential for further sites to be identified for both residential and commercial units.
- 5.58 In addition to treated wastewater, development sites within 200 m of the Habitats Site have the potential to impact water quality through surface water run-off. These sites are identified in Table 3.
- 5.59 **Overall, Likely Significant Effects of the Draft (Regulation 18) RLP on the Pevensey Levels SAC and Ramsar regarding water quality cannot be excluded. The site is screened in for Appropriate Assessment for water quality.**
- 5.60 The following proposed policies contained in the Draft (Regulation 18) RLP are screened in for Appropriate Assessment in relation to water quality:
- Proposed Strategy: Overall Spatial Development:
 - 1500 identified or potential units on residential sites
 - 3,886 sqm of employment floorspace

Summary

- 5.61 The following Habitats Site is taken forward to Appropriate Assessment in Chapter 6:
- Dungeness, Romney Marsh and Rye Bay SPA / Ramsar
 - Pevensey Levels SAC / Ramsar

Water Quantity, Level and Flow

Dungeness, Romney Marsh and Rye Bay SPA / Ramsar

- 5.62 The Dungeness, Romney Marsh and Rye Bay SPA / Ramsar is designated for wader and wildfowl species, as well as for birds of prey and terns. All these features are dependent on a degree of hydrological continuity within the SPA / Ramsar. Owing to its faunal diversity and habitat complexity, changes in its hydrological regime may have a wide range of consequences. For example, a reduction in the water level of grazing marsh diminishes the habitat available to the invertebrate prey of waders. A reduction of freshwater input to the marine environment can lead to changes in water salinity and / or turbidity, with potential effects on invertebrate and fish populations. The water flow and levels in the SPA / Ramsar is largely maintained by the rivers Rother, Brede and Tillingham and an increased water abstraction from these surface waterbodies might reduce the water supplied to the ditches of the SPA/ Ramsar sites.
- 5.63 **Overall, Likely Significant Effects of the RLP on the Dungeness, Romney Marsh and Rye Bay SPA / Ramsar regarding water quantity, level and flow cannot be excluded. The site is screened in for Appropriate Assessment water quantity, level and flow.**
- 5.64 The following proposed policies contained in the RLP are screened in for Appropriate Assessment in relation to water quality:

- Proposed Strategy: Overall Spatial Development and the identified residential sites associated with the strategy.
- ECO1: Employment Floorspace Need Policy (For the period up to 2040, the Council will plan for at least 74,189sqm of additional employment floorspace). Eight identified commercial sites are within 200m of the SPA /Ramsar with the potential for surface water run-off.

Pevensey Levels SAC / Ramsar

- 5.65 Excessive changes to the hydrological integrity, such as through effects on water flow and volume, of Habitats Sites are most likely to be the consequence of increased water abstraction for the public water supply and surface water run-off from impermeable urban surfaces.
- 5.66 The Pevensey Levels SAC is designated for its population of ram's-horn snails and Natural England's Site Improvement Plan highlights that a maintenance of adequate water levels (0.3cm below ditch neck) is critical to the survival and migration of this species. Furthermore, the Ramsar site is designated for its outstanding assemblage of wetland plants and invertebrates, all of which depend on appropriate water levels throughout at least parts of their life cycle. The SAC has a relatively narrow hydrological catchment, and its water level is primarily maintained by a few key rivers that traverse the plain.
- 5.67 There is already a requirement within the DaSA that any net new hardstanding associated with development in the surface water catchment of the SAC/Ramsar site must be accompanied by at least three levels of SUDS which should have regard to all relevant factors (flood risk, compatibility for infiltration, groundwater, runoff characteristics, ground stability, topography, soils, geology, contamination issues, existing infrastructure and archaeology). It is understood that the lead flood authorities are considering increasing that requirement to at least four levels of SUDS.
- 5.68 **Overall, Likely Significant Effects of the Draft (Regulation 18) RLP on the Pevensey Levels SAC / Ramsar regarding water quantity, level and flow cannot be excluded. The site is screened in for Appropriate Assessment for water quantity, level and flow.**
- 5.69 The following policy contained in the Draft (Regulation 18) RLP are screened in for Appropriate Assessment in relation to water quantity level and flow:
- Proposed Strategy: Overall Spatial Development Strategy:
 - Identified sites sufficient for 1001 residential units with identified sites with potential for 1049 further residential units within the Pevensey Levels catchment

Summary

- 5.70 The following Habitats Site is taken forward to Appropriate Assessment in Chapter 6:
- Dungeness, Romney Marsh and Rye Bay SPA / Ramsar
 - Pevensey Levels SAC / Ramsar

6. Appropriate Assessment

Atmospheric Pollution (Nitrogen Deposition)

Dungeness, Romney Marsh and Rye Bay SPA/Ramsar

- 6.1 The Dungeness, Romney Marsh and Rye Bay SPA/ Ramsar is screened in for appropriate assessment for atmospheric pollution on the basis that the Draft (Regulation 18) RLP will significantly increase the population and employment opportunities within the district, likely resulting in more commuter journeys being undertaken within 200m of sensitive SPA/Ramsar areas.
- 6.2 The A259 is a likely commuting route linking coastal regions across the area of the Local Plan. The road runs directly through the Dungeness Complex in places and forms the northern boundary of large sections of the SPA/Ramsar to which it is adjacent.
- 6.3 Identified and potential sites within the Rye and Icklesham areas are most significant in this respect. An anticipated quantum of employment floorspace of 11,925sqm in Rye Harbour and 1,675 sqm in Rye will lead to an increase in commuting traffic into the area. Housing increases of 206 to 240 residential units across the area will also lead to some increases in commuting traffic along the A259.
- 6.4 APIS provides details of critical nitrogen loading for habitats related to the designated bird species for the SPA.
- 6.5 The MAGIC website system indicates that two relevant habitats are found within 200m of the road, these are:
- Coastal saltmarsh, and
 - Grazing marsh
- 6.6 Table 2 shows critical nitrogen loadings for the designated species and identified supporting habitats.

Table 2: Nitrogen critical loads for the designated species of the SPA by habitat present. Rows in bold denote species that could be adversely affected by nitrogen deposition according to APIS

Species	Habitat ⁹⁵	Minimum Critical Load for N (kg N/ha/yr)	Minimum Critical Load for N (kg N/ha/yr)	Species sensitive to nutrient nitrogen impacts on broad habitat	Reason
Hen Harrier	Salt Marsh	10	20	No	No expected impact
Mediterranean gull	Salt Marsh	10⁹⁶	20	No	Potential negative impact on species due to impacts on the species' broad habitat.
Golden Plover	Salt Marsh	10	20	Yes	1. Potential negative impact on species due to impacts on the species' broad habitat. 2. Potential positive impact on species due to impacts on the species' food supply.

⁹⁵ Much of the habitat present along much of the A259 is grazing marsh. However, grazing marsh per se does not have a critical load, and for the relevant SPA birds the critical load for rich fen is recommended on APIS as a proxy for their habitat.

⁹⁶ Saltmarsh has two separate critical loads: 10-20kgN/ha/yr for mid-upper saltmarsh and 20-30 kgN/ha/yr for pioneer saltmarsh. The more precautionary figure for upper saltmarsh is used as a default but survey data could justify the use of the pioneer saltmarsh critical load range in some locations.

Species	Habitat ⁹⁵	Minimum Critical Load for N (kg N/ha/yr)	Minimum Critical Load for N (kg N/ha/yr)	Species sensitive to nutrient nitrogen impacts on broad habitat	Reason
Avocet (breeding)	Salt marsh	10	20	Yes	1. Potential negative impact on species due to impacts on the species' broad habitat. 2. Potential positive impact on species due to impacts on the species' food supply.
Aquatic warbler	Rich Fens	15	25	Yes	Potential negative impact on species due to impacts on the species' broad habitat.
<i>Great bittern (breeding)</i>	<i>Rich Fens</i>	<i>15</i>	<i>25</i>	<i>Yes</i>	<i>Potential negative impact on species due to impacts on the species' broad habitat.</i>
Marsh harrier	Rich Fens	15	25	Yes	Potential negative impact on species due to impacts on the species' broad habitat.
Hen Harrier	Rich Fens	15	25	No	No expected impact

- 6.7 Great bittern is assessed in APIS when breeding; however, the bittern is noted for wintering in this location and hence is not considered further. Species where the potential for an effect is equivocal such that impacts could be both positive and negative and thus balance out overall are also not included.
- 6.8 The following species therefore have the potential to be impacted by increased nitrogen loads at this Habitats site:
- Aquatic warbler
 - Mediterranean gull
 - Marsh harrier
- 6.9 APIS shows critical load for Nitrogen in the identified areas (within 200m of the A259) of coastal saltmarsh of 12.2 kg/ha/yr, and 12.5 kg/ha/yr based on 1km APIS data for mid-year 2020. This is above the minimum critical load Nitrogen for this habitat but below the maximum critical load for Nitrogen.
- 6.10 For identified areas of grazing marsh, APIS indicates loadings of 11.9 kg/ha/yr (Closest data polygon) which is 20% below the minimum critical load nitrogen for the rich fen habitat recommended as a proxy for these species (aquatic warbler and marsh harrier) on APIS. It is very unlikely that increased traffic due to Local Plan growth, even in combination with other plans and projects, would result in a sufficiently great increase in total nitrogen deposition to raise it above the critical load for hen harrier and aquatic warbler. Most modelling exercises to 2040 forecast a net *reduction* in nitrogen deposition at the roadside, despite forecast traffic growth, due to the improvement in vehicle emissions technology and electrification of the vehicle fleet.
- 6.11 Where the A259 passes through Rye and crosses the River Rother there are areas of saltmarsh within 200m of the road. Since the A259 is a strategic through-route in that location traffic growth due to Local Plan housing and employment could be substantial. It is not currently known whether Mediterranean gulls use those areas of saltmarsh. However, the Natural England Supplementary Advice on Conservation Objectives (SACO) does state that they breed at Rye Harbour LNR, which is nearby. Even if they do not currently nest there, the SACO notes that a restore target has been set for this species as overall the numbers have declined and recent numbers of fledged chicks are very low. So any assessment should allow for potential expansion of their breeding locations over the Local Plan period.
- 6.12 It is also not currently known whether the saltmarsh areas within 200m of the A259 are mid-upper or pioneer saltmarsh. If the latter, then the relevant critical load is not forecast

to be exceeded and is unlikely to be exceeded due to traffic growth for the reasons cited for rich fens. This will therefore be investigated for the Regulation 19 HRA. Traffic and air quality modelling will also be undertaken to inform the Regulation 19 HRA. The total amount of saltmarsh affected would be very low; approximately 1ha of saltmarsh lies within 200m of the A259 according to MAGIC compared to approximately 45ha in the SPA as a whole. Nonetheless, modelling will enable more precise quantification of the affected area.

- 6.13 Policy ENV7: Environmental Pollution includes the statement that “*Development will only be permitted where it is demonstrated that there will be no adverse impacts on [environmental factors] as a result of, airborne pollution,*”. Evidence is therefore required in the form of modelling for air quality impacts.
- 6.14 **Following appropriate assessment, adverse effects on the integrity of Dungeness, Romney Marsh and Rye Bay SPA/Ramsar cannot be excluded at this point and will need further investigation or Regulation 19.**

Recommendations

- 6.15 AECOM recommends that transport and air quality modelling is undertaken to demonstrate the contribution of the Regulation 19 version of the Rother Local Plan both in isolation and in combination with other projects and plans to inform the Regulation 19 HRA.

Recreational Pressure

Dungeness Complex

- 6.16 The Draft (Regulation 18) RLP allocates approx. 5,158 to 7,287 residential units in the Rother District. This increase in the local population will be associated with an enhanced pressure on nearby recreational resources, including the Dungeness Complex which lies within and to the east of the Rother District.
- 6.17 The strategic Dungeness Complex Sustainable Access and Recreation Management Strategy (SARMS) has been prepared in partnership with Folkstone & Hythe District Council with advice from Natural England.
- 6.18 The SARMS visitor assessment⁹⁷ identified that just under 20% of visitors are regular and that 90% of these regular visitors come from a distance within 20km from the boundary of the SPA. Almost all the (90% of) regular visitors reside in Shepway (now Folkestone & Hythe) or Rother districts. The SARMS strategy area initially examined the 75th percentile (i.e. locations within which 75% of visitors derive) which is a commonly used metric for defining the visitor catchment of a Habitats site for mitigation purposes. For the Dungeness Complex the 75% percentile covered large parts of south-east England given the appeal of the Complex as a tourist destination. Since that zone was impractically large and did not take account of the frequency of visits (regular visitors making a disproportionate impact to pressure compared to occasional visitors), a second zone showing 90% of all regular visitors was also calculated. Plan 7 of the SARMS considered the results of the surveys (both the data on regular visitors and that on all visitors) and mapped a 10km zone from the coast as being a concentration of visitor sources.
- 6.19 It is therefore considered in this HRA that all net new housing within this 10km zone within Rother and Folkestone & Hythe, given this is where the majority of regular visitors live and regular visitors to a site tend to have a disproportionate impact from occasional visitors, could make a disproportionate ‘in combination’ contribution to recreational pressure in the Dungeness Complex to such an extent that mitigation would be required. It is noted that visitor pressure is not distributed evenly across all authorities with the visitor survey report indicating for example that very few visitors to the Dungeness Complex come from Hastings.

⁹⁷ [Dungeness Complex Sustainable Access and Recreation Management Strategy \(SARMS\) Supporting Document 4 – Visitor Assessment](#) (2017) [Accessed online, 10/11/2023]

- 6.20 Proposed policy ENV6 states that all development within the strategy area would need to have regard to the measures identified in that strategy. Proposals that have the potential to result in any increase in levels of recreational access within the area will need to demonstrate measures to avoid impacts on the Dungeness Complex of Habitats Sites. Appropriate measures will be secured as part of a planning permission either by condition or legal agreement.
- 6.21 The future usage of the western beach, and hence the habitat value, may also be impacted upon by development which reduces the number of parking spaces at the central car park and redevelop those on the former putting green site (identified sites CAM0001 and CAM0002). Planning applications for this site allocation need to be fully assessed in this context once they are brought forward.
- 6.22 **Policy ENV6 provides a sufficient policy framework through delivery of the SARMS to ensure that there are no adverse impacts on the conservation objectives of the Dungeness Complex from recreational pressure as a result of the Draft (Regulation 18) RLP on the Dungeness Complex and that recreational pressure. As a result, subject to consideration of implications of any reduced parking on visitor pressure within the Dungeness Complex, it is considered that no adverse effect on the integrity of the Dungeness Complex will arise from the Local Plan.**

Recommendations

- 6.23 It is recommended that the Draft Dungeness Complex SARMS is reviewed and updated to allow effective implementation of Proposed Policy ENV6. In particular it is recommended that the governance and funding arrangements for the management of the Dungeness Complex SARMS measures are formalised. This should include a body for delivery of the measures, a charging tariff, a mechanism for collecting funds from affected developers, and a regular review process to inform future reviews of measures. The tariff would be informed by consideration of the cost of implementing the identified measures and the number of dwellings that are likely to be affected. Since the SARMS is a joint exercise between Rother and Folkestone & Hythe, this exercise should also be done jointly.

Water Quality

Dungeness, Romney Marsh and Rye Bay SPA / Ramsar and Pevensy Levels SAC/Ramsar

- 6.24 The Dungeness, Romney Marsh and Rye Bay SPA/Ramsar and Pevensy Levels SAC/Ramsar were screened in for Appropriate Assessment for water quality on the basis of the following proposal:
- Identified sites for 135 residential units with potential for another 52 identified sites which have not yet been confirmed.
 - Identified sites for 15,825 sqm of employment floorspace with sites with potential for a further 7,413 sqm.
- 6.25 The Natural England Site Improvement Plan (SIP) for the Dungeness Complex lists water pollution concerns as a threat to the conservation objectives of the site with the potential to adversely impact Bewick's swan, shoveler, Mediterranean gull, common tern, little tern, and great crested newt and their supporting habitats. Fluctuations in water levels across the grazing marsh habitats potentially impact upon designated bird features that rely upon these habitats. This is both during the winter when birds will be roosting and feeding, and also during the breeding season. Infrastructure to help manage water levels in the complex ditch network, including the Royal Military Canal, across the grazing marsh habitat is critical for the fine balance of water levels and movement of water across the site. Great crested newt breeding ponds are scattered across the SAC designation and could be seriously impacted if water levels were reduced to the point of drying out ponds permanently.

- 6.26 The SIP notes that *“Across the site historically, there has been a reliance on soakaway facilities. Southern Water installed on-line sewage facilities in early 2000s. Private connection to the new system by householders has been slow in take up. Data gathered by the EA shows diffuse pollution moving landward from the housing at Greatstone. This could be impacting the SPA lakes and requires further investigation.”*
- 6.27 The SIP for the Pevensy Levels notes that water pollution as a threat to the site’s Conservation Objectives with particular respect to the little ramshorn whirlpool snail with a proposed measure to reduce nutrient output whilst maintaining water availability. Focus of the SIP is on reduction of phosphate output from existing point sources without loss of water flow.
- 6.28 The specific focus of the SIP for the Pevensy levels through a measure to reduce nutrient output reflects the sensitivity of the ramshorn whirlpool snail and aquatic vegetation to water quality issues. By contrast the designated species of the Dungeness Complex are less sensitive to pollutants and the SIP identifies a current action to investigate the water quality concerns at Greatstone. Greatstone itself is 11km from the nearest residential allocation (CAM004) and the RLP is unlikely to impact this issue. The impact on the Pevensy Levels hydrological catchment is therefore of particular interest in the assessment below.
- 6.29 With regard to surface runoff, the Draft (Regulation 18) RLP includes **Policy ENV2: Sustainable Surface Water Drainage** which requires that peak run off rates from development must be the lower of the greenfield rate or the existing rate/volume of discharge. SuDS must be in place and functional for the lifetime of the development.
- 6.30 **Policy ENV2** also requires that surface water will pass through two treatment stages. When in the hydrological catchments of Pevensy Levels or the Dungeness Complex of Habitats Sites, a minimum of three stages will be required. Furthermore, **Policy ENV2** requires developments triggering an HRA to provide sufficient details of an appropriate water drainage scheme to satisfy the requirements of the HRA.
- 6.31 Furthermore, **Policy ENV1: Coastal, Water and Flood Risk Management** lays out conditions for the effective management of water including the requirement that *“any development does not adversely impact any ordinary watercourse, main river or flood and sea defence”*. The policy requires new development to not have an adverse effect on the water quality and potential yield of water sources in line with the objectives of the South East River Basin Management Plan.
- 6.32 With regard to discharge of treated wastewater, Southern Water have produced a Drainage and Wastewater Management Plan (DWMP) for the Rother catchment which assesses future risks to 2050 and which identifies growth and urban creep as a key issue impacting changes in risk levels.⁹⁸ Specific priorities of the DWMP is reducing nutrient discharges from the WTWs across the river basin to prevent deterioration of the internationally designated Habitats site and improving the resilience of our networks and treatment works to prevent pollution incidents, particularly in Rye and Fairlight.
- 6.33 For the Cuckmere and Pevensy Levels hydrological catchment, the DWMP shows that the Bexhill and Hastings WwTW has a very significant risk and three other WwTW also show moderately significant risks in relation to nutrients. The Bexhill and Hastings WwTW is key to the proposed developments and has been assessed as having a very significant risk in relation to failing nutrient neutrality measures. To address this the following priorities have been identified:
- Reducing the number of spills from the 66 storm overflows which together currently spill around 1200 times per annum;

⁹⁸ Southern Water (2023) [Drainage and Wastewater Management Plan – Brava for the Rother Catchment](#) [Accessed online, 23/02/2024]

- Separating or attenuating excess rainwater in the sewer networks to reduce the risks of flooding and frequency of storm overflow discharges, especially in Bexhill, Hastings, Newhaven and Hailsham;
 - Investigating the potential impact of wastewater discharges on Good Ecological Status in designated Habitats at Cuckmere, Pevensey and Hastings;
 - Developing a nutrient budget by investigating the sources impacting designated habitats sites at Cuckmere and the Pevensey Levels;
 - Planning for potential significant development at Bexhill-on-Sea;
 - Addressing saline intrusion and tide locking as part of the Blue Heart Project and Pevensey Bay to Eastbourne Coastal Management Scheme;
 - Improving the resilience of the networks and treatment works to prevent pollution incidents, particularly in Bexhill, Eastbourne and Hailsham;
 - Reducing the risk of sewer blockages by increasing sewer jetting and targeting customer campaigns to reduce the amount of FOG (fats, oils and grease) and unflushables in the sewer network around Eastbourne, St. Leonards (Warrior Square) and Castle Hill, Hastings; and
 - Reducing the risk to groundwater by reducing leakage from sewers in the Westham area of Eastbourne.
- 6.34 The Southern Water DWMP for the region identifies the investment needs and the current risks to nutrient neutrality (and other pollution) but it does not indicate timescales for correction of the identified issues.
- 6.35 **Policy ENV1** specifies a preference for connection to the public sewer or in the event that it is not practical to connect to the public sewer then the applicant must provide sufficient information to understand the potential implications for the water environment of non-mains drainage, including its potential implications.
- 6.36 **Provided that the Draft (Regulation 18) RLP Policy ENV1 incorporates the recommendations below it can be concluded that there will be no adverse impact on water quality in the Dungeness, Romney Marsh and Rye Bay SPA/ Ramsar or Pevensey Levels SAC/Ramsar.**

Recommendations

- 6.37 AECOM recommends the inclusion of the following in Policy ENV1:
- 6.1 Firstly, the assessment of the implications on the water environment should include an assessment of the impact on the Pevensey Levels SAC/Ramsar and Dungeness, Romney Marsh and Rye Bay SPA/ Ramsar.
- 6.2 Secondly, all developments within the catchment area for the Pevensey Levels SAC/Ramsar should demonstrate:
- agreement by the wastewater provider that modelling demonstrates that there is sufficient capacity within the relevant WwTW that the housing can be accommodated without a negative effect on the receiving environment; or
 - that the development can be delivered without a negative water quality effect on the Habitats sites, and the means by which any necessary protection measures will be secured for the lifetime of the development.
- 6.3 This additional text is recommended because Policy ENV1 as currently worded does not specifically prohibit an adverse effect on the integrity of Habitats sites or the receiving water environment, but simply requires the implications to be understood.

Water Quantity, Level and Flow

Dungeness, Romney Marsh and Rye Bay SPA / Ramsar and Pevensy Levels SAC/Ramsar

- 6.4 The Dungeness, Romney Marsh and Rye Bay SPA/Ramsar was screened in for water quantity, level and flow on the basis of the following proposal:
- Proposed Strategy: Overall Spatial Development:
 - identified sites which have not yet been confirmed.
 - Identified sites for 15,825 sqm of employment floorspace with sites with potential for a further 7,413 sqm.
- 6.5 The Natural England Site Improvement Plan (SIP) for the Dungeness Complex lists inappropriate water levels as a threat to the conservation objectives. The SIP notes that *“Infrastructure to help manage water levels in the complex ditch network, including the Royal Military Canal, across the grazing marsh habitat is critical for the fine balance of water levels and movement of water across the site. Great crested newt breeding ponds are scattered across the SAC designation and would be seriously impacted if water levels were reduced to the point of drying out ponds permanently.”*, and concludes that a *“Review Water Level Management Plan for Romney Marsh and Denge Marsh”* is required.
- 6.6 The SIP for the Pevensy Levels notes inappropriate water levels as a threat to the site’s Conservation Objectives with particular respect to the little ramshorn whirlpool snail with a proposed measure of sustainable water level management. Rother District Council (amongst others) are recorded as a delivery partner in identifying and funding sustainable long-term mechanisms for this.
- 6.7 With regard to surface runoff, the Draft (Regulation 18) RLP includes **Policy ENV2: Sustainable Surface Water Drainage** which requires that peak run off rates from development must be the lower of the greenfield rate or the existing rate/volume of discharge. SuDS must be in place and functional for the lifetime of the development.
- 6.8 **Policy ENV2** also requires that surface water will pass through two treatment stages. When in the catchments of Pevensy Levels or the Dungeness Complex of Habitats Sites, a minimum of three stages will be required.
- 6.9 Furthermore, **Policy ENV2** requires developments triggering an HRA to provide sufficient details of an appropriate water drainage scheme to satisfy the requirements of the HRA.
- 6.10 **Policy ENV1: Coastal, Water and Flood Risk Management** lays out conditions for the effective management of water including the requirement that *“any development does not adversely impact any ordinary watercourse, main river or flood and sea defence”*. The policy requires that new development does not have an adverse effect on the water quality and potential yield of water sources in line with the objectives of the South East River Basin Management Plan.
- 6.11 **Policy GTC4: Water Efficiency** lays out requirements for water efficiency to minimise impacts on water resources and achieve the optimal technical housing standards of no more than 110 litres per person per day (Building regulation G2).
- 6.12 In terms of abstraction for Public Water Supply, Rother District is supplied by both Southern Water and South East Water. Both companies have produced Water Resource Management Plans which set out how they intend to meet water supply needs to 2070. These WRMPs are based on robust population growth projections for their supply areas and run well beyond the end of the Local Plan period. Both WRMPs have been accompanied by HRAs which conclude that there will be no adverse effect on the integrity of any European sites from water supply strategies requirement to meet the needs of the Water Resource Zones that include Rother District.

- 6.13 Given the above evidence and inclusion of the requirement to maintain the yield of water it can be concluded that the Draft (Regulation 18) RLP will not result in an adverse impact on water quantity, level and flow in the Dungeness, Romney Marsh and Rye Bay SPA/ Ramsar or Pevensey Levels SAC/Ramsar.**

7. Conclusions and Recommendations

- 7.1 AECOM was appointed by Rother District Council (the Council) to produce a Habitats Regulations Assessment (HRA) of their Regulation 18 Local Plan. This HRA examines the effects of the Local Plan on internationally important wildlife sites. The requirement for HRA is set by the Conservation of Habitats and Species Regulations 2017 (as amended).
- 7.2 The Habitats sites, considered within the Appropriate Assessment for impact pathways that could not be screened out at the Test of Likely Significant Effects stage were:
- Dungeness Complex of habitats sites
 - Pevensey Levels SAC / Ramsar
- 7.3 Impact pathways considered were atmospheric pollution, functionally linked habitat, recreational pressure, water quality, and water quantity, level and flow. Of which functionally linked habitat was screened out for LSEs and the remaining impact pathways were brought forward for appropriate assessment.
- 7.4 Atmospheric pollution could not be dismissed at this stage due to the presence of potentially vulnerable habitats (notable saltmarsh) adjacent to the A259 in the Rye area. At this point it therefore cannot be determined that the Draft (Regulation 18) RLP would not have an adverse effect on the integrity of the Dungeness Complex (specifically the Mediterranean gull population that nests near Rye). Traffic and air quality modelling of air pollution should be undertaken to inform the HRA for the next stage of the RLP (Regulation 19).
- 7.5 For recreational pressure it was determined that adherence to the strategic Dungeness Complex Sustainable Access and Recreation Management Strategy (SARMS) would be sufficient to prevent adverse effects on the Habitats sites in the complex. It is noted that the SARMS is still in a draft form and it is encouraged that a final document is published at the earliest possible opportunity. It was also recommended that the governance and funding arrangements for the management of the Dungeness Complex SARMS measures are formalised. The HRA concludes that as most regular visitors to the sites live in Folkestone & Hythe or Rother District, and a high proportion live within a distance of 20km, focus should be given to the impacts of residential development.
- 7.6 Since the SARMS was originally developed, and the DaSA adopted, mitigation strategies for such Habitats sites now focus largely on residential development, and whilst this is a departure from the previous HRA, it is considered that they are a key source of recreational pressure and it is possible from local planning authorities to introduce planning controls and tariffs in order to make the implementation of SARMS more consistent and effective. Therefore, the SARMS should include a body for delivery of the measures, a charging tariff, a mechanism for collecting funds from affected developers, and a regular review process to inform future reviews of measures. The tariff would be informed by consideration of the cost of implementing the identified measures and the number of dwellings that are likely to be affected. Since the SARMS is a joint exercise between Rother and Folkestone & Hythe, this exercise should also be done jointly.
- 7.7 Adverse effects on Habitats sites integrity due to water quality or water resource issues were dismissed on the basis of the assessment work and remedial measures (for water quality) being introduced by Southern Water and (for water supply) South East Water, and due to the protections provided by proposed environmental policies within the plan, particularly that which requires at least three types of SUDS treatment for development sites within the surface water catchments of the Dungeness Complex or Pevensey Levels SAC/Ramsar.
- 7.8 AECOM has made the following recommendations in relation to the Draft (Regulation 18) RLP:

- AECOM recommends that air quality modelling of the combined developments is modelled and the results are available for assessment in the Regulation 19 version of the Rother Local Plan.
- AECOM recommends that the Draft Dungeness Complex SARMS is completed and published to allow effective implementation of Proposed Policy ENV6. It is considered in this HRA that all net new housing within Rother District located within this 10km zone around the Dungeness Complex will have a disproportionate impact on the Complex (along with residents in a similar zone in Folkstone & Hythe) and therefore require mitigation.
- AECOM recommends that governance arrangements for the management and measurement of The Dungeness Complex SARMS measures are put in place and referenced appropriately in the Policy ENV6. This should include a body for delivery of the measures, a charging tariff, a mechanism for collecting funds from affected developers, and a regular review process to inform future reviews of measures. The tariff would be informed by consideration of the cost of implementing the identified measures and the number of dwellings that are likely to be affected. Since the SARMS is a joint exercise between Rother and Folkestone & Hythe, this exercise should also be done jointly.
- AECOM recommends the inclusion of the following in Policy ENV1:
- All developments connected to Wastewater Treatment Works discharging into the catchment of the Dungeness, Romney Marsh and Rye Bay SPA/ Ramsar should demonstrate:
 - agreement by the wastewater provider that modelling demonstrates that there is sufficient capacity within the relevant WwTW that the housing can be accommodated without a negative effect on the receiving environment; or
 - that the development can be delivered without a negative water quality effect on the Habitats sites, and the means by which any necessary protection measures will be secured for the lifetime of the development.

7.9 Note that this recommendation is AECOM opinion, and it is ultimately for the Council and Examination process to determine actual policy wording. Provided the above recommendations are included within the Draft (Regulation 18) then it can be concluded that the Plan document will not result in an adverse effect on the integrity of any Habitats sites either alone or in combination, except with regard to the air quality matter which requires further modelling for Regulation 19.

Appendix A LSE Screening of Potential Development Sites

- 7.10 Table 3 below undertakes screening of identified sites for residential or employment development. Sites previously in the DaSA or relevant Neighbourhood Plans are indicated. Where sites are screened in for Appropriate Assessment, the final column is shaded orange.
- 7.11 In relation to surface water run-off and the Pevensey Levels SAC, evidence-based criteria for determining which sites require further consideration was used from the Pevensey Levels Hydrological Catchment Area (shown in Appendix C). This catchment area was applied to the screening of all identified sites.
- 7.12 In relation to surface water run-off and the Dungeness, Romney Marsh and Rye Bay SPA/Ramsar, development sites within 200 m of the Habitats Sites have been screened in for appropriate assessment.
- 7.13 Since recreational pressure on the Dungeness complex of sites is an overarching issue that applies to growth throughout Rother District in combination with that in Folkestone & Hythe and further afield (as per the SARMS: ‘*Most regular visitors to the sites live in Shepway⁹⁹ or Rother district, and a high proportion live within a distance of 20km*’), it is not taken into account in the screening tables below as all residential sites would be coloured amber. This would not aid discrimination between whether some sites pose more of a risk to Habitats Sites than others. There is also a mitigation strategy which has been published (the SARMS). However, since the Dungeness SARMS constitutes mitigation, it cannot be formally taken into account until the appropriate assessment stage. Therefore, the pathway of recreational pressure on the Dungeness complex of sites is taken forward to appropriate assessment in order to enable the role of the SARMS to be taken into account in forming a view of the risk of actual adverse effects on integrity.

Table 3 Screening of Rother District Identified Sites

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
Bexhill Central		BEX0004 RR/2021/1455/P (Currently Allocated in the DaSA)	Land at Gullivers Bowls Club, Knole Road, Bexhill	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar site: 3.5 km west • Dungeness, Romney Marsh and Rye Bay SPA/Ramsar¹⁰⁰: 15 km east 	The proposed development is for 8 residential units.	<p>No likely significant effect</p> <p>The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from any designated site.</p> <p>The development is therefore not likely to have a significant effect on Habitats Sites.</p>

⁹⁹ Note Shepway is now called Folkestone & Hythe District

¹⁰⁰ Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
Bexhill Central		BEX0008 (Currently Allocated in the DaSA)	Land south-east of Beeching Road, Bexhill	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar site: 2.6 km west • Dungeness, Romney Marsh and Rye Bay SPA/Ramsar: 16 km east 	The proposed development is for 2,000 sq m of commercial units.	<p>No likely significant effect</p> <p>The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from any designated site.</p> <p>The development is therefore not likely to have a significant effect on Habitats Sites.</p>
Bexhill Central		BEX0010 (Currently Allocated in the DaSA)	Land south of Terminus Road	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar site: 2.7 km west • Dungeness, Romney Marsh and Rye Bay SPA/Ramsar: 16 km east 	The proposed development is for 10 residential units.	<p>No likely significant effect</p> <p>The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from any designated site.</p> <p>The development is therefore not likely to have a significant effect on Habitats Sites.</p>
Bexhill Central		BEX0011 RR/2020/155/P	2a Sackville Road	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar site: 2.7 km west • Dungeness, Romney Marsh and Rye Bay SPA/Ramsar: 16 km east 	The proposed development is for 6 residential units and 95 sqm of commercial units.	<p>No likely significant effect</p> <p>The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from any designated site.</p> <p>The development is therefore not likely to have a significant effect on Habitats Sites.</p>
Bexhill Central		BEX0020 RR/2019/430/P (Currently Allocated in the DaSA)	Land at Former High School Site, Down Road, Bexhill	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar site: 3.1 km west • Dungeness, Romney Marsh and Rye Bay SPA/Ramsar¹⁰¹: 15 km east 	The proposed development is for 52 residential units and 6,500 sqm of commercial units.	<p>No likely significant effect</p> <p>The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from any designated site.</p> <p>The development is therefore not likely to have a significant effect on Habitats Sites.</p>
Bexhill Central		BEX0031 RR/2020/577/P	30 Dorset Road, Bexhill	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar site: 4 km west 	The proposed development is for 8 residential units.	<p>No likely significant effect</p>

¹⁰¹ Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
				<ul style="list-style-type: none"> Dungeness, Romney Marsh and Rye Bay SPA/Ramsar: 16 km east 		<p>The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from any designated site.</p> <p>The development is therefore not likely to have a significant effect on Habitats Sites.</p>
Bexhill Central		BEX0047 RR/2019/1229/P	17 & 17A Dorset Road South, Bexhill	<ul style="list-style-type: none"> Pevensey Levels SAC/Ramsar site: 4 km west Dungeness, Romney Marsh and Rye Bay SPA/Ramsar: 16 km east 	The proposed development is for 11 residential units.	<p>No likely significant effect</p> <p>The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from any designated site.</p> <p>The development is therefore not likely to have a significant effect on Habitats Sites.</p>
Bexhill Central		BEX0069	28-32 Western Road, Bexhill On Sea	<ul style="list-style-type: none"> Pevensey Levels SAC/Ramsar site: 3.1 km west Dungeness, Romney Marsh and Rye Bay SPA/Ramsar: 16 km east 	The proposed development is for 7 residential units.	<p>No likely significant effect</p> <p>The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from any designated site.</p> <p>The development is therefore not likely to have a significant effect on Habitats Sites.</p>
Bexhill Central		BEX0116 RR/2021/1656/P	Land west of Fryatts Way, Bexhill	<ul style="list-style-type: none"> Pevensey Levels SAC/Ramsar: 2.1 km west, within the Pevensey Levels hydrological catchment area Dungeness Romney Marsh and Rye Bay SPA/Ramsar¹⁰²: 16 km east 	The proposed development is for 210 residential units.	<p>Likely significant effect</p> <p>This development lies within the Pevensey Levels Hydrological Catchment Area. It is therefore considered probable that surface water discharge may reach the SAC/Ramsar given the well-connected ditch network. Therefore, likely significant effects on this Habitats Site with regards to water quality cannot be ruled out.</p>

¹⁰² Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
						Note that this judgment is made prior to the consideration of any mitigation measures devised for the site or set out in Local Plan policy.
Bexhill Central		BEX0158	Land west of Pages Lane, Bexhill on Sea	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar site: 1.4 km west • Dungeness, Romney Marsh and Rye Bay SPA/Ramsar: 17 km east 	The proposed development is for 25 residential units.	<p>No likely significant effect</p> <p>The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from any designated site.</p> <p>The development is therefore not likely to have a significant effect on Habitats Sites.</p>
Bexhill Central		BEX0189	1 Wellington Place and 3-15 Terminus Road, Bexhill-on-Sea	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar site: 2.7 km west • Dungeness, Romney Marsh and Rye Bay SPA/Ramsar: 16 km east 	The proposed development is for 4 residential units.	<p>No likely significant effect</p> <p>The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from any designated site.</p> <p>The development is therefore not likely to have a significant effect on Habitats Sites.</p>
Bexhill Central		BEX0201	Rear of 11 Endwell Road, Bexhill	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar site: 3.4 km west • Dungeness, Romney Marsh and Rye Bay SPA/Ramsar¹⁰³: 15 km east 	The proposed development is for 6 residential units.	<p>No likely significant effect</p> <p>The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from any designated site.</p> <p>The development is therefore not likely to have a significant effect on Habitats Sites.</p>
Bexhill West		BEX0006 RR/2017/1705/P (Currently Allocated in the DaSA)	Land off Spindlewood Drive, Bexhill	<ul style="list-style-type: none"> • Adjacent to the Pevensey Levels SAC (west), within the Pevensey Levels hydrological catchment area • Dungeness Romney Marsh and Rye Bay Ramsar: 18 km east. 	The proposed development is for 160 residential units.	<p>Likely significant effect</p> <p>This development lies within the Pevensey Levels Hydrological Catchment Area. It is therefore considered probable that surface water discharge may reach the</p>

¹⁰³ Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
						SAC/Ramsar given the well-connected ditch network. Therefore, likely significant effects on this Habitats Site with regards to water quality cannot be ruled out. Note that this judgment is made prior to the consideration of any mitigation measures devised for the site or set out in Local Plan policy.
Bexhill West		BEX0015 RR/2020/1410/P	Land south of Barnhorn Road & West of Ashridge Court, Barnhorn Road, Bexhill on Sea	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 450 m west, within the Pevensey Levels hydrological catchment area • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 19 km east 	The proposed development is for 29 residential units.	Likely significant effect This development lies within the Pevensey Levels Hydrological Catchment Area. It is therefore considered probable that surface water discharge may reach the SAC/Ramsar given the well-connected ditch network. Therefore, likely significant effects on this Habitats Site with regards to water quality cannot be ruled out. Note that this judgment is made prior to the consideration of any mitigation measures devised for the site or set out in Local Plan policy.
Bexhill West		BEX0016 RR/2020/2260/P	Land at Clavering Walk, Bexhill on Sea	<ul style="list-style-type: none"> • Adjacent to the Pevensey Levels SAC/Ramsar (west and north), within the Pevensey Levels hydrological catchment area • Dungeness Romney Marsh and Rye Bay Ramsar¹⁰⁴: 19 km east 	The proposed development is for 70 residential units.	Likely significant effect This development lies within the Pevensey Levels Hydrological Catchment Area. It is therefore considered probable that surface water discharge may reach the SAC/Ramsar given the well-connected ditch network. Therefore, likely significant effects on this Habitats Site with regards to water quality cannot be ruled out.

¹⁰⁴ Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
						Note that this judgment is made prior to the consideration of any mitigation measures devised for the site or set out in Local Plan policy.
Bexhill West		BEX0021 RR/2022/3018/P	Land at Barnhorn Green, Bexhill on Sea	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 500 m southeast (within hydrological catchment) • Dungeness Romney Marsh and Rye Bay Ramsar: 19 km east. 	The proposed development is for 2025 sq m of commercial floorspace.	<p>Likely significant effect</p> <p>This development lies within the Pevensey Levels Hydrological Catchment Area. It is therefore considered probable that surface water discharge may reach the SAC/Ramsar given the well-connected ditch network. Therefore, likely significant effects on this Habitats Site with regards to water quality cannot be ruled out.</p> <p>Note that this judgment is made prior to the consideration of any mitigation measures devised for the site or set out in Local Plan policy.</p>
Bexhill West		BEX0073 RR/2023/926/P	Barn at Beeches Farm, Sandhurst Lane, Bexhill	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 650 m southeast, within the Pevensey Levels hydrological catchment area Dungeness Romney Marsh and Rye Bay Ramsar¹⁰⁵: 19 km east. 	The proposed development is for 5 residential units.	<p>Likely significant effect</p> <p>This development lies within the Pevensey Levels Hydrological Catchment Area. It is therefore considered probable that surface water discharge may reach the SAC/Ramsar given the well-connected ditch network. Therefore, likely significant effects on this Habitats Site with regards to water quality cannot be ruled out.</p> <p>Note that this judgment is made prior to the consideration of any mitigation measures devised for the site or set out in Local Plan policy.</p>

¹⁰⁵ Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
Bexhill West		BEX0100	Land at Barnhorne Manor Farm - northern section	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 200 m south, within the Pevensey Levels catchment area • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 19 km east 	The proposed development is for 100 residential units.	<p>Likely significant effect</p> <p>This development lies within the Pevensey Levels Hydrological Catchment Area. It is therefore considered probable that surface water discharge may reach the SAC/Ramsar given the well-connected ditch network. Therefore, likely significant effects on this Habitats Site with regards to water quality cannot be ruled out. Note that this judgment is made prior to the consideration of any mitigation measures devised for the site or set out in Local Plan policy.</p>
Bexhill West		BEX0129	Pond Field, Sandhurst Lane, Bexhill	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 700 m south, within the Pevensey Levels catchment area • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 19 km east 	The proposed development is for 10 residential units.	<p>Likely significant effect</p> <p>This development lies within the Pevensey Levels Hydrological Catchment Area. It is therefore considered probable that surface water discharge may reach the SAC/Ramsar given the well-connected ditch network. Therefore, likely significant effects on this Habitats Site with regards to water quality cannot be ruled out. Note that this judgment is made prior to the consideration of any mitigation measures devised for the site or set out in Local Plan policy.</p>
Bexhill West		BEX0140	Lower Barnhorn Farm and Caravan Park, Bexhill	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 100 m south, within the Pevensey Levels catchment area • Dungeness Romney Marsh and Rye Bay SPA/Ramsar¹⁰⁶: 19 km east 	The proposed development is for 50 residential units.	<p>Likely significant effect</p> <p>This development lies within the Pevensey Levels Hydrological Catchment Area. It is therefore considered probable that surface water discharge may reach the</p>

¹⁰⁶ Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
						SAC/Ramsar given the well-connected ditch network. Therefore, likely significant effects on this Habitats Site with regards to water quality cannot be ruled out. Note that this judgment is made prior to the consideration of any mitigation measures devised for the site or set out in Local Plan policy.
Bexhill West		BEX0159	Land north of Rosewood Park, Gotham Farm, Bexhill-on-Sea	<ul style="list-style-type: none"> • Pevensey Levels SAC: 950 m southwest, within the Pevensey Levels hydrological catchment area • Dungeness Romney Marsh and Rye Bay Ramsar: 18 km east 	The proposed development is for 200 residential units.	Likely significant effect This development lies within the Pevensey Levels Hydrological Catchment Area. It is therefore considered probable that surface water discharge may reach the SAC/Ramsar given the well-connected ditch network. Therefore, likely significant effects on this Habitats Site with regards to water quality cannot be ruled out. Note that this judgment is made prior to the consideration of any mitigation measures devised for the site or set out in Local Plan policy.
Bexhill West		BEX0160	Land east of Fantails, Sandhurst Lane, Bexhill	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 658 m south, within the Pevensey Levels catchment area • Dungeness Romney Marsh and Rye Bay SPA/Ramsar¹⁰⁷: 19 km east 	The proposed development is for 15 residential units.	Likely significant effect This development lies within the Pevensey Levels Hydrological Catchment Area. It is therefore considered probable that surface water discharge may reach the SAC/Ramsar given the well-connected ditch network. Therefore, likely significant effects on this Habitats Site with regards to water quality cannot be ruled out.

¹⁰⁷ Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
						Note that this judgment is made prior to the consideration of any mitigation measures devised for the site or set out in Local Plan policy.
Bexhill West		BEX0181	Land at Barnhorne Manor Farm - southern section	<ul style="list-style-type: none"> Adjacent to the Pevensey Levels SAC/Ramsar (south and west), within the Pevensey Levels hydrological catchment area Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 19 km south 	The proposed development is for 100 residential units.	<p>Likely significant effect</p> <p>This development lies within the Pevensey Levels Hydrological Catchment Area. It is therefore considered probable that surface water discharge may reach the SAC/Ramsar given the well-connected ditch network. Therefore, likely significant effects on this Habitats Site with regards to water quality cannot be ruled out. Note that this judgment is made prior to the consideration of any mitigation measures devised for the site or set out in Local Plan policy.</p>
Bexhill West		BEX0182	Land at Barnhorn Road and Coneyburrow Lane, Bexhill	<ul style="list-style-type: none"> Pevensey Levels SAC/Ramsar: 620 m, within the Pevensey Levels hydrological catchment area Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 19 km east. 	The proposed development is for 25 residential units.	<p>Likely significant effect</p> <p>This development lies within the Pevensey Levels Hydrological Catchment Area. It is therefore considered probable that surface water discharge may reach the SAC/Ramsar given the well-connected ditch network. Therefore, likely significant effects on this Habitats Site with regards to water quality cannot be ruled out. Note that this judgment is made prior to the consideration of any mitigation measures devised for the site or set out in Local Plan policy.</p>
Bexhill West		BEX0188 RR/2021/1519/P	81 Cooden Drive, Bexhill	<ul style="list-style-type: none"> Pevensey Levels SAC/Ramsar site: 1.4 km west 	The proposed development is for 5 residential units.	<p>No likely significant effect</p> <p>The site does not lie within the Pevensey Levels Catchment and</p>

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
				<ul style="list-style-type: none"> Dungeness, Romney Marsh and Rye Bay SPA/Ramsar¹⁰⁸: 17 km east 		<p>lies a considerable distance from any other designated site.</p> <p>The development is therefore not likely to have a significant effect on Habitats Sites.</p>
Bexhill West		BEX0190 RR/2022/3018/P	49 Cooden Sea Road, Cooden	<ul style="list-style-type: none"> Pevensey Levels SAC/Ramsar: 900 m southwest, within the Pevensey Levels hydrological catchment area Dungeness Romney Marsh and Rye Bay Ramsar: 18 km east 	The proposed development is for 9 residential units.	<p>Likely significant effect</p> <p>This development lies within the Pevensey Levels Hydrological Catchment Area. It is therefore considered probable that surface water discharge may reach the SAC/Ramsar given the well-connected ditch network. Therefore, likely significant effects on this Habitats Site with regards to water quality cannot be ruled out.</p> <p>Note that this judgment is made prior to the consideration of any mitigation measures devised for the site or set out in Local Plan policy.</p>
Bexhill West		BEX0199 RR/2022/2570/P	41A, 41 & 43 Barnhorn Road, Bexhill	<ul style="list-style-type: none"> Pevensey Levels SAC/Ramsar: 550 m southwest, within the within the Pevensey Levels hydrological catchment area Dungeness Romney Marsh and Rye Bay Ramsar¹⁰⁹: 19 km east 	The proposed development is for 35 residential units.	<p>Likely significant effect</p> <p>This development lies within the Pevensey Levels Hydrological Catchment Area. It is therefore considered probable that surface water discharge may reach the SAC/Ramsar given the well-connected ditch network. Therefore, likely significant effects on this Habitats Site with regards to water quality cannot be ruled out.</p> <p>Note that this judgment is made prior to the consideration of any mitigation measures devised for</p>

¹⁰⁸ Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

¹⁰⁹ Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
						the site or set out in Local Plan policy.
Bexhill North		BEX0001 RR/2022/2364/P (Currently Allocated in the DaSA)	Kiteye Farm and adjoining land	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 3.4 km southwest • Dungeness Romney Marsh and Rye Bay Ramsar: 16 km east 	The proposed development is for 250 residential units.	<p>No likely significant effect</p> <p>The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from any other designated site.</p> <p>The development is therefore not likely to have a significant effect on Habitats Sites.</p>
Bexhill North		BEX0002 RR/2022/1584/P (Currently Allocated in the DaSA)	Land west of Watermill Lane	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 3.5 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 15 km east 	The proposed development is for 130 residential units.	<p>No likely significant effect</p> <p>The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from any other designated site.</p> <p>The development is therefore not likely to have a significant effect on Habitats Sites.</p>
Bexhill North		BEX0003 RR/2022/1584/P (Currently Allocated in the DaSA)	Land east of Watermill Lane	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 4 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 15 km east 	The proposed development is for 150 residential units.	<p>No likely significant effect</p> <p>The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from any other designated site.</p> <p>The development is therefore not likely to have a significant effect on Habitats Sites.</p>
Bexhill North		BEX0005 (Currently Allocated in the DaSA)	Land adjacent to 276 Turkey Road, Bexhill	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 2.8 km southwest, within the Pevensey Levels hydrological catchment area • Dungeness Romney Marsh and Rye Bay Ramsar¹¹⁰: 16.6 km east 	The development proposals for the site are for 30 residential units.	<p>Likely significant effect</p> <p>This development lies within the Pevensey Levels Hydrological Catchment Area. It is therefore considered probable that surface water discharge may reach the SAC/Ramsar given the well-connected ditch network. Therefore, likely significant</p>

¹¹⁰ Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
						effects on this Habitats Site with regards to water quality cannot be ruled out. Note that this judgment is made prior to the consideration of any mitigation measures devised for the site or set out in Local Plan policy.
Bexhill North		BEX0009 RR/2023/1527/P (Currently Allocated in the DaSA)	Land at Moleynes Mead, Fryatts Way, Bexhill	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 2.1 km west, within the Pevensey Levels hydrological catchment area • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 17 km east 	The proposed development is for 26 residential units.	<p>Likely significant effect</p> <p>This development lies within the Pevensey Levels Hydrological Catchment Area. It is therefore considered probable that surface water discharge may reach the SAC/Ramsar given the well-connected ditch network. Therefore, likely significant effects on this Habitats Site with regards to water quality cannot be ruled out. Note that this judgment is made prior to the consideration of any mitigation measures devised for the site or set out in Local Plan policy.</p>
Bexhill North		BEX0017 RR/2018/2790/P (Currently Allocated in the DaSA)	Land at Levetts Wood and Oaktree Farm, Sidley, Bexhill	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 3.9 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 15 km east 	The proposed development is for 33,500 sq m of commercial space.	<p>No likely significant effect</p> <p>The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from any other designated site. The development is therefore not likely to have a significant effect on Habitats Sites.</p>
Bexhill North		BEX0029 RR/2017/963/P	Bexhill Enterprise Park – Escarpment Site B – south of Glovers End, Bexhill	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 4.5 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar¹¹¹: 14.5 km east 	The proposed development is for 3,275 sq m of commercial space.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not</p>

¹¹¹ Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
Bexhill North		BEX0032	Former Sidley Sports Ground, Glovers Lane	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 3.9 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 15 km east 	The proposed development is for 50 residential units.	<p>likely to have a significant effect on Habitats sites.</p> <p>No likely significant effect</p> <p>The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from any other designated site.</p> <p>The development is therefore not likely to have a significant effect on Habitats Sites.</p>
Bexhill North		BEX0071 RR/2022/1233/P	Cemetery Lodge, 250 Turkey Road, Bexhill On Sea	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 2.8 km southwest, within the Pevensey Levels hydrological catchment area • Dungeness Romney Marsh and Rye Bay Ramsar: 17 km east 	The proposed development is for 6 residential units.	<p>Likely significant effect</p> <p>This development lies within the Pevensey Levels Hydrological Catchment Area. It is therefore considered probable that surface water discharge may reach the SAC/Ramsar given the well-connected ditch network. Therefore, likely significant effects on this Habitats Site with regards to water quality cannot be ruled out. Note that this judgment is made prior to the consideration of any mitigation measures devised for the site or set out in Local Plan policy.</p>
Bexhill North		BEX0112	Land on the north side of Turkey Road, Bexhill, East Sussex	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 2.5 km southwest, within the Pevensey Levels hydrological catchment area • Dungeness Romney Marsh and Rye Bay Ramsar¹¹²: 17 km east 	The proposed development is for 89 residential units.	<p>Likely significant effect</p> <p>This development lies within the Pevensey Levels Hydrological Catchment Area. It is therefore considered probable that surface water discharge may reach the SAC/Ramsar given the well-connected ditch network. Therefore, likely significant effects on this Habitats Site with regards to water quality cannot be ruled out.</p>

¹¹² Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
						Note that this judgment is made prior to the consideration of any mitigation measures devised for the site or set out in Local Plan policy.
Bexhill North		BEX0113	Chestnut Meadow Camping and Caravan Park, Ninfield Road, Bexhill-on-Sea, East Sussex	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 3.5 km southwest, within the Pevensey Levels hydrological catchment area • Dungeness Romney Marsh and Rye Bay Ramsar: 17 km east 	The proposed development is for 8 residential units.	<p>Likely significant effect</p> <p>This development lies within the Pevensey Levels Hydrological Catchment Area. It is therefore considered probable that surface water discharge may reach the SAC/Ramsar given the well-connected ditch network. Therefore, likely significant effects on this Habitats Site with regards to water quality cannot be ruled out. Note that this judgment is made prior to the consideration of any mitigation measures devised for the site or set out in Local Plan policy.</p>
Bexhill North		BEX0115 RR/2021/2545/P	Land west of Watermill Lane, Bexhill	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 3.9 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 16 km east 	The proposed development is for 80 residential units.	<p>No likely significant effect</p> <p>The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from any other designated site. The development is therefore not likely to have a significant effect on Habitats Sites.</p>
Bexhill North		BEX0122	Land at St Mary's Lane, Bexhill	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 3.3 km southwest, within the Pevensey Levels hydrological catchment area • Dungeness Romney Marsh and Rye Bay Ramsar¹¹³: 17 km east 	The proposed development is for 25 residential units.	<p>Likely significant effect</p> <p>This development lies within the Pevensey Levels Hydrological Catchment Area. It is therefore considered probable that surface water discharge may reach the SAC/Ramsar given the well-connected ditch network. Therefore, likely significant</p>

¹¹³ Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
						effects on this Habitats Site with regards to water quality cannot be ruled out. Note that this judgment is made prior to the consideration of any mitigation measures devised for the site or set out in Local Plan policy.
Bexhill North		BEX0126	Land north of North Bexhill Access Road (NBAR) Bexhill	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 3.4 km southwest. • Dungeness Romney Marsh and Rye Bay Ramsar: 16 km east 	The proposed development is for 15 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats Sites.</p>
Bexhill North		BEX0130	The Leg of Mutton Field, St Mary's Lane, Bexhill	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 3.2 km southwest, within the Pevensey Levels hydrological catchment area • Dungeness Romney Marsh and Rye Bay Ramsar: 17 km east 	The proposed development is for 5 residential units.	<p>Likely significant effect</p> <p>This development lies within the Pevensey Levels Hydrological Catchment Area. It is therefore considered probable that surface water discharge may reach the SAC/Ramsar given the well-connected ditch network. Therefore, likely significant effects on this Habitats Site with regards to water quality cannot be ruled out. Note that this judgment is made prior to the consideration of any mitigation measures devised for the site or set out in Local Plan policy.</p>
Bexhill North		BEX0132	Land at High House Farm, Ninfield Road, Bexhill	<ul style="list-style-type: none"> • Pevensey Levels SAC: 2.9 km southwest, within the Pevensey Levels hydrological catchment area • Dungeness Romney Marsh and Rye Bay Ramsar¹¹⁴: 16 km east 	The proposed development is for 200 dwellings.	<p>Likely significant effect</p> <p>This development lies within the Pevensey Levels Hydrological Catchment Area. It is therefore considered probable that surface water discharge may reach the SAC/Ramsar given the well-connected ditch network.</p>

¹¹⁴ Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
						Therefore, likely significant effects on this Habitats Site with regards to water quality cannot be ruled out. Note that this judgment is made prior to the consideration of any mitigation measures devised for the site or set out in Local Plan policy.
Bexhill North		BEX0149	Land north of A2691 (NBAR)	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 3.5 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 16 km east 	The development proposals are of 80 residential dwellings.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Bexhill North		BEX0169	Land north of Mount View Street	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 4.6 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 14 km east 	The development proposals are for 9,500 sq m of commercial space.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Bexhill North		BEX0170	Land west of Bexhill Enterprise Park, Glovers Lane, Bexhill	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 4.4 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar¹¹⁵: 14.5 km east 	The development proposals are for 2,200 sq m of commercial footprint.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Bexhill North		BEX0171	Land west of Bexhill Innovation Park, Glovers Lane, Bexhill on Sea	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 4.3 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 14.5 km east 	The development proposals are for 2,000 sq m of commercial footprint.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>

¹¹⁵ Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
Bexhill North		BEX0172	Land at Rialtio Hall, St Mary's Lane, Bexhill	<ul style="list-style-type: none"> • Pevensey Levels SAC: 3.1 km southwest, within the Pevensey Levels hydrological catchment area • Dungeness Romney Marsh and Rye Bay Ramsar: 17 km east 	The development proposals are of 15 residential dwellings.	<p>Likely significant effect</p> <p>This development lies within the Pevensey Levels Hydrological Catchment Area. It is therefore considered probable that surface water discharge may reach the SAC/Ramsar given the well-connected ditch network. Therefore, likely significant effects on this Habitats Site with regards to water quality cannot be ruled out. Note that this judgment is made prior to the consideration of any mitigation measures devised for the site or set out in Local Plan policy.</p>
Bexhill North		BEX0194 RR/2015/1760/P	Worsham Farm Site B, Land West of Mount View Street	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 4.3 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 14.5 km east 	The development proposals are for 540 sq m of commercial footprint and 47 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Bexhill North		BEX0196 RR/2015/1760/P	Worsham Farm Site D, Land East of Mount View Street	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 4.5 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar¹¹⁶: 14 km east 	The development proposals are for 232 sq m of commercial footprint and 447 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Bexhill North		BEX0197 RR/2015/1760/P	Worsham Farm Site E, Land South of Worsham Lane	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 5.1 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 13 km east 	The development proposals are for 370 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>

¹¹⁶ Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
Bexhill North		BEX0198 RR/2022/2719/P	Ardath House, Hastings Road, Bexhill, TN40 2HJ	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 4.1 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 14.5 km east 	The development proposals are for 21 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Bexhill North		BEX0204	Land at Scallets Wood House, St Mary's Lane, Bexhill- on-Sea	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 2.8 km southwest, within the Pevensey Levels hydrological catchment area • Dungeness Romney Marsh and Rye Bay Ramsar: 17 km south 	The development proposals are for 20 residential units.	<p>Likely significant effect</p> <p>This development lies within the Pevensey Levels Hydrological Catchment Area. It is therefore considered probable that surface water discharge may reach the SAC/Ramsar given the well-connected ditch network. Therefore, likely significant effects on this Habitats Site with regards to water quality cannot be ruled out. Note that this judgment is made prior to the consideration of any mitigation measures devised for the site or set out in Local Plan policy.</p>
Battle		BAT0002	Land north of Sunny Rise, North Trade Road, Battle	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 6.5 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar¹¹⁷: 16 km east 	The development proposals are for 10 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Battle		BAT0003 RR/2020/2307/P (Currently allocated in the relevant NP)	Land at Blackfriars, Battle	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 8 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 12 km east 	The development proposals are for 200 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>

¹¹⁷ Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
Battle		BAT0014	Land at Almonry Farm, North Trade Road, Battle	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 7 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 14 km east 	The development proposals are for 100 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Battle		BAT0020 (Currently llocated in the relevant NP)	Glengorse, Battle	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 8 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 12.5 km east 	The development proposals are for 15 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Battle		BAT0050 RR/2021/1745/P	Land at Whitelands Cottage, North Trade Road, Battle	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 6.3 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 16 km east 	The development proposals are for 20 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Battle		BAT0070 RR/2022/1765/P	Beech Farm (Archery Field), Battle	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 7 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar¹¹⁸: 15 km east 	The development proposals are for 1,895 sqm of commercial footprint.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Battle		BAT0083	Land at 1 Loose Farm Cottages, Hastings Road, Battle	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 8.5 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 12 km east 	The development proposals are for 5 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Battle		BAT0085	Land north of Glengorse, Battle	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 8.5 km southwest 	The development proposals are for 20 residential units.	<p>No likely significant effect</p>

¹¹⁸ Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
				<ul style="list-style-type: none"> Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 12.5 km east 		This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.
Battle		BAT0088 (Currently allocated in the relevant NP)	Swallow Barn, Netherfield	<ul style="list-style-type: none"> Pevensy Levels SAC/Ramsar: 7.5 km southwest, within the Pevensy Levels hydrological catchment area Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 18 km east 	The development proposals are for 10 residential units.	<p>Likely significant effect</p> <p>This development lies within the Pevensy Levels Hydrological Catchment Area. It is therefore considered probable that surface water discharge may reach the SAC/Ramsar given the well-connected ditch network. Therefore, likely significant effects on this Habitats Site with regards to water quality cannot be ruled out. Note that this judgment is made prior to the consideration of any mitigation measures devised for the site or set out in Local Plan policy.</p>
Battle		BAT0108 (Currently allocated in the relevant NP)	White House Poultry Farm, Netherfield	<ul style="list-style-type: none"> Pevensy Levels SAC/Ramsar: 7.3 km southwest and adjacent to the Pevensy Levels hydrological catchment area. Dungeness Romney Marsh and Rye Bay SPA/Ramsar¹¹⁹: 17.5 km east 	The development proposals are for 23 residential units.	<p>Likely significant effect</p> <p>This development is directly adjacent to the Pevensy Levels Hydrological Catchment Area. It is therefore considered possible that surface water discharge may reach the SAC/Ramsar given the proximity of the site well-connected ditch network. Therefore, likely significant effects on this Habitats Site with regards to water quality cannot be ruled out. Note that this judgment is made prior to the consideration of any mitigation measures devised for the site or set out in Local Plan policy.</p>

¹¹⁹ Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
Battle		BAT0109 (Currently allocated in the relevant NP)	Land at Calbec House, Calbec Hill, Battle	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 8.5 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 13 km east 	The development proposals are for 5 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Battle		BAT0110	Land north of Glengorse, Battle	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 8.5 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 12.5 km east 	The development proposals are for 15 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Battle		BAT0111	Land to north west of Glengorse, Battle	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 8.5 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 12.5 km east 	The development proposals are for 25 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Battle		BAT0116	Maryland Boarding School, Hastings Road, Battle	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 8.5 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar¹²⁰: 12.5 km east 	The development proposals are for 20 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Battle		BAT0018	Land south of Battle Hill, Battle	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 8.5 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 12.5 km east 	The development proposals are for 8 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>

¹²⁰ Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
Beckley		BEC0003 (Currently Allocated in the DaSA)	Land South of Buddens Green, Beckley Four Oaks	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 21 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 7 km southeast 	The development proposals are for 6 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Beckley		BEC0011	Land west of Oakley Cottages, Main Street, Beckley	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 21 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 7 km southeast 	The development proposals are for 6 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Beckley		BEC0021	Land east of Village Hall, Main Street, Beckley	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 21 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 7.5 km southeast 	The development proposals are for 6 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Beckley		BEC0024 (Currently Allocated in the DaSA)	Land East of Hobbs Lane, Beckley, Four Oaks, East Sussex	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 22 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar¹²¹: 7 km southeast 	The development proposals are for 14 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Brede		BRE0002 (Currently Allocated in the DaSA)	Land west of the A28, Northiam Road, Broad Oak	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 17 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 7.5 km southeast 	The development proposals are for 40 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>

¹²¹ Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
Brede		BRE0003	Land south of the Broad Oak public house, Broad Oak	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 17 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 7 km southeast 	The development proposals are for 12 residential units.	
Brede		BRE0028	The Coppice, Northiam Road, Broad Oak, Rye, East Sussex	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 17 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 7.5 km southeast 	The development proposals are for 3 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Brede		BRE0030	Birchwood, Northiam Road, Broad Oak	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 17 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 7.5 km southeast 	The development proposals are for 3 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Brede		BRE0035	Land at Broad Oak Lodge, Chitcombe Road	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 17 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 8 km southeast 	The development proposals are for 5 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Brede		BRE0045	Land east of Pottery Close, Brede	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 16 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar¹²²: 7 km southeast 	The development proposals are for 5 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Brightling		BRI0001 RR/2018/480/P	Coldharbour Farm Estate, Battle Road, Brightling	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 7 km southwest and largely within the Pevensey Levels hydrological catchment area. • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 20 km east 	The development proposals are for 1,861 sqm of commercial footprint.	<p>Likely significant effect</p> <p>This development is directly adjacent to the Pevensey Levels Hydrological Catchment Area. It is therefore considered possible</p>

¹²² Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
						that surface water discharge may reach the SAC/Ramsar given the proximity of the site well-connected ditch network. Therefore, likely significant effects on this Habitats Site with regards to water quality cannot be ruled out. Note that this judgment is made prior to the consideration of any mitigation measures devised for the site or set out in Local Plan policy.
Burwash		BUR0001 RR/2017/582/P	Land South West of Strand Meadow, Burwash	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 13 km south • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 23 km southeast 	The development proposals are for 30 residential units.	No likely significant effect This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.
Burwash		BUR0005 RR/2021/1608/P	Ashwood Nursing Home, Fir Tree Bank	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 12 km south • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 25 km southeast 	The development proposals are for 12 residential units.	No likely significant effect This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.
Burwash		BUR0020	The Nutrition Centre (Higher Nature), Goodsoal Lane, Burwash Common	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 12 km south • Dungeness Romney Marsh and Rye Bay SPA/Ramsar¹²³: 25 km southeast 	The development proposals are for 3 residential units and 500 sq m of commercial footprint.	No likely significant effect This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on European sites.
Burwash		BUR0022 RR/2021/431/P	Oakleys Garage, Burwash	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 12 km south • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 23 km southeast 	The development proposals are for 7 residential units.	No likely significant effect This development lies a considerable distance from any designated site. The

¹²³ Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
						development is therefore not likely to have a significant effect on Habitats sites.
Burwash		BUR0027	Land south of Heathfield Road, Burwash Common	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 12 km south • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 25 km southeast 	The development proposals are for 10 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Burwash		BUR0035	Pippins, High Street, Burwash, TN19 7HH	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 12 km south • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 23 km southeast 	The development proposals are for 6 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Camber		CAM0001 (Currently Allocated in the DaSA)	Land at the Former Putting Green Site, Old Lydd Road, Camber	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 28 km south • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 140 m north 	The development proposals are for 10 residential units.	<p>Likely significant effect</p> <p>This development is within 200m of Dungeness Romney Marsh and Rye Bay SPA/Ramsar. It is therefore considered possible that surface water discharge may reach the SPA/Ramsar given the proximity of the site well-connected ditch network. Therefore, likely significant effects on this Habitats Site with regards to water quality cannot be ruled out. Note that this judgment is made prior to the consideration of any mitigation measures devised for the site or set out in Local Plan policy.</p>
Camber		CAM0002 (Currently Allocated in the DaSA)	Land at the Central Car Park, Old Lydd Road, Camber	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 28 km south • Dungeness Romney Marsh and Rye Bay SPA/Ramsar¹²⁴: Adjacent 	The development proposals are for 1,000 sq m of commercial footprint.	<p>Likely significant effect</p> <p>This development is within 200m of Dungeness Romney Marsh</p>

¹²⁴ Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
						and Rye Bay SPA/Ramsar. It is therefore considered possible that surface water discharge may reach the SPA/Ramsar given the proximity of the site well-connected ditch network. Therefore, likely significant effects on this Habitats Site with regards to water quality cannot be ruled out. Note that this judgment is made prior to the consideration of any mitigation measures devised for the site or set out in Local Plan policy.
Camber		CAM0004	Lydd Road Garage, Lydd Road, Camber	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 28 km south • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 250 m north 	The development proposals are for 5 residential units and 80 sq m of commercial footprint.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on European sites.</p>
Catsfield		CAT0001 (Currently Allocated in the DaSA)	Land west of B2204, Catsfield	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 4.5 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar¹²⁵: 15.5 km east 	The development proposals are for 35 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites. This outcome differs from the previous HRA due to a mapping error (associated with the previous DaSA HRA)</p>
Catsfield		CAT0016	Broomham Bungalow, Catsfield	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 4.3 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 15.5 km east 	The development proposals are for 20 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>

¹²⁵ Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
Catsfield		CAT0029	Land south of Church Road, Catsfield	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 4.7 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 15.5 km east 	The development proposals are for 8 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Crowhurst		CRO0001 (Currently allocated in the relevant NP)	Land at Station Road/Forewood Lane, Crowhurst	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 7.4 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 12.5 km east 	The development proposals are for 12 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Crowhurst		CRO0003 (Currently allocated in the relevant NP)	Land adjacent to Station Car Park, Crowhurst	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 7.7 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 12 km east 	The development proposals are for 6 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Crowhurst		CRO0009	Land at Station Road/Forewood Lane, Crowhurst	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 7.5 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar¹²⁶: 12.5 km east 	The development proposals are for 12 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Crowhurst		CRO0010 (Currently allocated in the relevant NP)	Land south of Forewood Rise, Crowhurst	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 7 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 13 km southeast 	The development proposals are for 15 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>

¹²⁶ Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
Etchingham		ETC0003	Land rear of Oxenbridge Row, Etchingham	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 14 km south • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 22 km southeast 	The development proposals are for 10 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Etchingham		ETC0016	Land at Church Lane, Etchingham	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 15 km south • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 20 km southeast 	The development proposals are for 6 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Etchingham		ETC0020	Land at Oxenbridge Lane, Etchingham	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 14 km south • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 22 km east 	The development proposals are for 0 residential units and 0 sqm commercial footprint.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Ewhurst		EWH0002 RR/2021/825/P	Land at Compass Park, Junction Road, Ewhurst	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 15 km south • Dungeness Romney Marsh and Rye Bay SPA/Ramsar¹²⁷: 14 km southeast 	The development proposals are for 987 sqm of commercial footprint.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Ewhurst		EWH0010	Land east of Stockwood Meadow, Northiam Road, Staplecross	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 15 km south • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 12 km southeast 	The development proposals are for 16 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>

¹²⁷ Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
Ewhurst		EW0011	Land at Ockham Farm, Dagg Lane, Ewhurst Green	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 17 km south • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 13 km southeast 	The development proposals are for 740 sq m of commercial footprint.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Fairlight		FAI0001 (Currently Allocated in the DaSA)	Land east of Waites Lane, Fairlight Cove	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 17 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 1.2 km east 	The development proposals are for 35 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Guestling		GUE0012	Land at Wild Meadows, Chapel Lane, Guestling Green	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 16 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 3 km east 	The development proposals are for 20 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on European sites.</p>
Guestling		HAF0001 (Currently Allocated in the DaSA)	Land north of A265, Ivyhouse Lane, Hastings	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 13 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar¹²⁸: 5.5 km east 	The development proposals are for 1,800 sq m of commercial footprint.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Guestling		HAF0004 RR/2017/1829/P	Land at Burgess Road, Ivyhouse Lane Industrial Estate, Hastings	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 13 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 5.5 km east 	The development proposals are for 4,601 sq m of commercial footprint.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Guestling		HAF0026	Brackendale, Rock Lane, Hastings	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 14 km west 	The development proposals are for 20 residential units.	<p>No likely significant effect</p>

¹²⁸ Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
				<ul style="list-style-type: none"> Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 5 km east 		This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.
Hurst Green		HUG0001	Land adjacent to Pentwood Place, London Road, Hurst Green	<ul style="list-style-type: none"> Pevensey Levels SAC/Ramsar: 16 km southwest Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 19 km southeast 	The development proposals are for 3 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Hurst Green		HUG0013 RR/2017/2798/P	Land South of Lodge Farm, Hurst Green	<ul style="list-style-type: none"> Pevensey Levels SAC/Ramsar: 16 km southwest Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 19 km southeast 	The development proposals are for 26 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Hurst Green		HUG0016	Burgh Hill, Hurst Green	<ul style="list-style-type: none"> Pevensey Levels SAC/Ramsar: 16 km southwest Dungeness Romney Marsh and Rye Bay SPA/Ramsar¹²⁹: 19 km southeast 	The development proposals are for 7 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Hurst Green		HUG0021	Land south of Iridge Place, London Road, Hurst Green	<ul style="list-style-type: none"> Pevensey Levels SAC/Ramsar: 16 km southwest Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 18 km southeast 	The development proposals are for 28 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Icklesham		ICK0003 (Currently Allocated in the DaSA)	Land at Stoneworks Cottages, Rye Harbour	<ul style="list-style-type: none"> Pevensey Levels SAC/Ramsar: 26 km west 	The development proposals are for 40 residential units.	<p>Likely significant effect</p> <p>This site is located within 200m of Dungeness, Romney Marsh &</p>

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Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
				<ul style="list-style-type: none"> Dungeness Romney Marsh and Rye Bay SPA/Ramsar: Adjacent to west and south. 		Rye Bay SPA/Ramsar. Surface water discharge pathways can reach for several hundred metres. Therefore, it is not possible to say that the development would not have likely significant effects on the SPA/Ramsar site. Note that this judgment is made prior to the consideration of any mitigation measures devised for the site or set out in Local Plan policy.
Icklesham		ICK0005	Old Mears, Harbour Road, Rye Harbour	<ul style="list-style-type: none"> Pevensey Levels SAC/Ramsar: 26 km west Dungeness Romney Marsh and Rye Bay SPA/Ramsar: Adjacent to north and east 	The development proposals are for 3,063 sq m of commercial footprint.	<p>Likely significant effect</p> <p>This site is located within 200m of Dungeness, Romney Marsh & Rye Bay SPA/Ramsar. Surface water discharge pathways can reach for several hundred metres. Therefore, it is not possible to say that the development would not have likely significant effects on the SPA/Ramsar site. Note that this judgment is made prior to the consideration of any mitigation measures devised for the site or set out in Local Plan policy.</p>
Icklesham		ICK0006	The Saltings - site A, Harbour Road	<ul style="list-style-type: none"> Pevensey Levels SAC/Ramsar: 26 km west Dungeness Romney Marsh and Rye Bay SPA/Ramsar¹³⁰: Adjacent to north 	The development proposals are for 6,800 sq m of commercial footprint.	<p>Likely significant effect</p> <p>This site is located within 200m of Dungeness, Romney Marsh & Rye Bay SPA/Ramsar. Surface water discharge pathways can reach for several hundred metres. Therefore, it is not possible to say that the development would not have likely significant effects on the SPA/Ramsar site. Note that this judgment is made prior to the consideration of any mitigation</p>

¹³⁰ Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
Icklesham		ICK0026	Land at Churchfields Industrial Estate, Harbour Road, Rye Harbour	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 26 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: Adjacent to west and south. 	The development proposals are for 4,238 sq m of commercial footprint.	<p>measures devised for the site or set out in Local Plan policy.</p> <p>Likely significant effect</p> <p>This site is located within 200m of Dungeness, Romney Marsh & Rye Bay SPA/Ramsar. Surface water discharge pathways can reach for several hundred metres. Therefore, it is not possible to say that the development would not have likely significant effects on the SPA/Ramsar site. Note that this judgment is made prior to the consideration of any mitigation measures devised for the site or set out in Local Plan policy.</p>
Icklesham		ICK0028	Weslake Industrial Estate, Rye Harbour Road, Rye Harbour	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 26 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar¹³¹: Adjacent to south. 	The development proposals are for 4,510 sq m of commercial footprint.	<p>Likely significant effect</p> <p>This site is located within 200m of Dungeness, Romney Marsh & Rye Bay SPA/Ramsar. Surface water discharge pathways can reach for several hundred metres. Therefore, it is not possible to say that the development would not have likely significant effects on the SPA/Ramsar site. Note that this judgment is made prior to the consideration of any mitigation measures devised for the site or set out in Local Plan policy.</p>
Icklesham		ICK0041	Land west of Orchard Close, A259, Icklesham	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 18 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar¹³²: 1.9 km southeast 	The development proposals are for 4,150 sqm of commercial footprint.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>

¹³¹ Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

¹³² Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
Icklesham		ICK0045	The Atlas Business Park, Harbour Road, Rye Harbour	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 26 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: Adjacent to southwest. 	The development proposals are for 3,380 sqm of commercial footprint.	<p>Likely significant effect</p> <p>This site is located within 200m of Dungeness, Romney Marsh & Rye Bay SPA/Ramsar. Surface water discharge pathways can reach for several hundred metres. Therefore, it is not possible to say that the development would not have likely significant effects on the SPA/Ramsar site. Note that this judgment is made prior to the consideration of any mitigation measures devised for the site or set out in Local Plan policy.</p>
Icklesham		ICK0046	The Saltings - Site B, Harbour Road	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 26 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 80 m north. 	The development proposals are for 1,244 sqm of commercial footprint.	<p>Likely significant effect</p> <p>This site is located within 200m of Dungeness, Romney Marsh & Rye Bay SPA/Ramsar. Surface water discharge pathways can reach for several hundred metres. Therefore, it is not possible to say that the development would not have likely significant effects on the SPA/Ramsar site. Note that this judgment is made prior to the consideration of any mitigation measures devised for the site or set out in Local Plan policy.</p>
Iden		IDE0001 (Currently Allocated in the DaSA)	Land south of Elmsmead, Iden	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 26 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar¹³³: 1.7 km southeast 	The development proposals are for 12 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Iden		IDE0010	Street Field, Main Street, Iden	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 26 km southwest 	The development proposals are for 12 residential units.	<p>No likely significant effect</p>

¹³³ Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
				<ul style="list-style-type: none"> Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 1.5 km southeast 		This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.
Iden		IDE0011	Land rear of Conkers, Main Street	<ul style="list-style-type: none"> Pevensey Levels SAC/Ramsar: 26 km southwest Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 1.7 km southeast 	The development proposals are for 10 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Northiam		NOR0003 (Currently Allocated in the DaSA)	Land south of Northiam Church of England Primary School, Northiam	<ul style="list-style-type: none"> Pevensey Levels SAC/Ramsar: 20 km southwest Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 10 km southeast 	The development proposals are for 6 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Peasmarsh		PEA0001	Oaklands, Main Street, Peasmarsh, East Sussex	<ul style="list-style-type: none"> Pevensey Levels SAC/Ramsar: 23 km southwest Dungeness Romney Marsh and Rye Bay SPA/Ramsar¹³⁴: 4.2 km southeast 	The development proposals are for 6 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on European sites.</p>
Peasmarsh		PEA0002 (Currently allocated in the DaSA)	Land south of Main Street, Peasmarsh	<ul style="list-style-type: none"> Pevensey Levels SAC/Ramsar: 23 km southwest Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 4.1 km southeast 	The development proposals are for 45 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Peasmarsh		PEA0029	Units 1-6, Malthouse Business Park, Peasmarsh	<ul style="list-style-type: none"> Pevensey Levels SAC/Ramsar: 23 km southwest Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 3.6 km southeast 	The development proposals are for 5 residential units and 500 sq m of commercial footprint.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any</p>

¹³⁴ Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
						designated site. The development is therefore not likely to have a significant effect on Habitats sites.
Peasmarsch		PEA0031	Land west of Woodside, Main Street, Peasmarsch	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 23 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 4.5 km southeast 	The development proposals are for 10 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Peasmarsch		PEA0032	Land north of Flackley ash Hotel, Mackerel Hill, Peasmarsch	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 23 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 4.9 km southeast 	The development proposals are for 10 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Peasmarsch		PEA0033	Land east of Orchard Way, Peasmarsch	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 23 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar¹³⁵: 3.4 km southeast 	The development proposals are for 5 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Peasmarsch		PEA0034	Land adjacent to Cornerways, School Lane, Peasmarsch	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 23 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 4 km southeast 	The development proposals are for 7 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Peasmarsch		PEA0035	Tanhouse Site B - east, Tanhouse Lane, Peasmarsch	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 23 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 4.4 km southeast 	The development proposals are for 15 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not</p>

¹³⁵ Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
						likely to have a significant effect on Habitats sites.
Playden		PLA0012	Land south of Poppyfields - western field, Houghton Green Lane, Playden	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 26 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 800 m southeast 	The development proposals are for 10 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on European sites.</p>
Rye		RYE0001 (Currently allocated in the relevant NP)	Former Tilling Green School	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 25 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 850 m southeast 	The development proposals are for 20 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Rye		RYE0002 (Currently allocated in the relevant NP)	Winchelsea Road (East Side)	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 25 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar¹³⁶: 43 m southeast 	The development proposals are for 10 residential units and 500 sq m of commercial footprint.	<p>Likely significant effect</p> <p>This site is located within 200m of Dungeness, Romney Marsh & Rye Bay SPA/Ramsar.</p> <p>Surface water discharge pathways can reach for several hundred metres. Therefore, it is not possible to say that the development would not have likely significant effects on the SPA/Ramsar site. Note that this judgment is made prior to the consideration of any mitigation measures devised for the site or set out in Local Plan policy.</p>
Rye		RYE0003 (Currently allocated in the relevant NP)	Winchelsea Road (West Side)	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 25 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 200 m southeast 	The development proposals are for 35 residential units and 1,000 sq m of commercial footprint.	<p>Likely significant effect</p> <p>This site is located within 200m of Dungeness, Romney Marsh & Rye Bay SPA/Ramsar. Surface water discharge pathways can reach for several hundred</p>

¹³⁶ Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
						metres. Therefore, it is not possible to say that the development would not have likely significant effects on the SPA/Ramsar site. Note that this judgment is made prior to the consideration of any mitigation measures devised for the site or set out in Local Plan policy.
Rye		RYE0004 (Currently allocated in the relevant NP)	Rye Creative Centre (Former Freda Gardham School Site), New Road, Rye	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 25 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 60 m west 	The development proposals are for 30 residential units.	<p>Likely significant effect</p> <p>This site is located within 200m of Dungeness, Romney Marsh & Rye Bay SPA/Ramsar. Surface water discharge pathways can reach for several hundred metres. Therefore, it is not possible to say that the development would not have likely significant effects on the SPA/Ramsar site. Note that this judgment is made prior to the consideration of any mitigation measures devised for the site or set out in Local Plan policy.</p>
Rye		RYE0005 (Currently allocated in the relevant NP)	Rock Channel Site A - south, Rye	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 25 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar¹³⁷: 110 m southwest 	The development proposals are for 30 residential units and 1,900 sq m of commercial footprint.	<p>Likely significant effect</p> <p>This site is located within 200m of Dungeness, Romney Marsh & Rye Bay SPA/Ramsar. Surface water discharge pathways can reach for several hundred metres. Therefore, it is not possible to say that the development would not have likely significant effects on the SPA/Ramsar site. Note that this judgment is made prior to the consideration of any mitigation measures devised for the site or set out in Local Plan policy.</p>
Rye		RYE0006 (Currently allocated in the relevant NP)	Former Lower School Site, off Ferry Road, Rye	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 25 km southwest 	The development proposals are for 50 residential units.	<p>No likely significant effect</p>

¹³⁷ Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
				<ul style="list-style-type: none"> Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 540 m east 		This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.
Rye		RYE0015	Former Council Depot, Cyprus Place	<ul style="list-style-type: none"> Pevensey Levels SAC/Ramsar: 25 km southwest Dungeness Romney Marsh and Rye Bay SPA/Ramsar¹³⁸: 530 m south 	The development proposals are for 7 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Rye		RYE0016	Rye Boatyard, Rock Channel, Rye	<ul style="list-style-type: none"> Pevensey Levels SAC/Ramsar: 25 km southwest Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 60 m east 	The development proposals are for 613 sq m of commercial footprint.	<p>Likely significant effect</p> <p>This site is located within 200m of Dungeness, Romney Marsh & Rye Bay SPA/Ramsar. Surface water discharge pathways can reach for several hundred metres. Therefore, it is not possible to say that the development would not have likely significant effects on the SPA/Ramsar site. Note that this judgment is made prior to the consideration of any mitigation measures devised for the site or set out in Local Plan policy.</p>
Rye		RYE0040	Slade Yard, St Margaret's Terrace, Rye	<ul style="list-style-type: none"> Pevensey Levels SAC/Ramsar: 25 km southwest Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 195 m southwest 	The development proposals are for 30 residential units.	<p>Likely significant effect</p> <p>This site is located within 200m of Dungeness, Romney Marsh & Rye Bay SPA/Ramsar. Surface water discharge pathways can reach for several hundred metres. Therefore, it is not possible to say that the development would not have likely significant effects on the SPA/Ramsar site. Note that this judgment is made prior to the</p>

¹³⁸ Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
Rye		RYE0056	Land between 11 and 23 New Road, Rye	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 25 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar¹³⁹: 80 m west 	The development proposals are for 500 sq m of commercial footprint.	<p>consideration of any mitigation measures devised for the site or set out in Local Plan policy.</p> <p>Likely significant effect</p> <p>This site is located within 200m of Dungeness, Romney Marsh & Rye Bay SPA/Ramsar. Surface water discharge pathways can reach for several hundred metres. Therefore, it is not possible to say that the development would not have likely significant effects on the SPA/Ramsar site. Note that this judgment is made prior to the consideration of any mitigation measures devised for the site or set out in Local Plan policy.</p>
Rye		RYE0057	17 - 19 Tower Street, Rye	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 25 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 225 m southeast 	The development proposals are for 6 residential units and 175 sq m of commercial footprint.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Rye Foreign		RYF0008	Land south-west of Rye Hospital, Rye Road	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 25 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 650 m southeast 	The development proposals are for 34 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Salehurst & Robertsbridge		SAL0001	Land to the south east of Heathfield Gardens, Robertsbridge	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 12 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 16 km southeast 	The development proposals are for 38 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not</p>

¹³⁹ Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
						likely to have a significant effect on Habitats sites.
Salehurst & Robertsbridge		SAL0002 (Currently allocated in the relevant NP)	Vicarage Land, Land south of the western end of Fair Lane, Robertsbridge	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 13 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar¹⁴⁰: 17 km southeast 	The development proposals are for 8 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Salehurst & Robertsbridge		SAL0003 RR/2017/382/P (Currently allocated in the relevant NP)	Hodson's Mill, Northbridge Street, Robertsbridge	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 13 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 17 km southeast 	The development proposals are for 96 residential units and 1,200 sq m of commercial footprint.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Salehurst & Robertsbridge		SAL0004 RR/2022/1850/P RR/2022/283/P (Currently allocated in the relevant NP)	Grove Farm, Robertsbridge, Site A	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 13 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 17 km southeast 	The development proposals are for 32 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Salehurst & Robertsbridge		SAL0005	Culverwells, Land north of Station Road, Robertsbridge	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 13 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 17 km southeast 	The development proposals are for 17 residential units and 1,300 sq m of commercial footprint.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Salehurst & Robertsbridge		SAL0012	Land at Bishops Lane, Robertsbridge	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 12.5 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 17 km southeast 	The development proposals are for 0 residential units and 0 sqm commercial footprint.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>

¹⁴⁰ Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
Salehurst & Robertsbridge		SAL0022	Land at Grove Farm (Phase 2), west of Robertsbridge Bypass, Robertsbridge	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 13 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar¹⁴¹: 17 km southeast 	The development proposals are for 35 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Salehurst & Robertsbridge		SAL0028 (Currently allocated in the relevant NP)	Land south-east of Heathfield Gardens, Robertsbridge	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 12 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 16 km southeast 	The development proposals are for 38 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Salehurst & Robertsbridge		SAL0029	Land south-west of Heathfield Gardens, Robertsbridge	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 12 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 16 km southeast 	The development proposals are for 20 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Sedlescombe		SED0001 (Currently allocated in the relevant NP)	Land at Sunningdale	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 11.5 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 10 km southeast 	The development proposals are for 8 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Sedlescombe		SED0003 (Currently allocated in the relevant NP)	Land at Church Hill Farm	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 11.5 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 10.5 km southeast 	The development proposals are for 12 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>

¹⁴¹ Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
Sedlescombe		SED0004 (Currently allocated in the relevant NP)	Land at Sedlescombe Sawmills	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 13 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 11.5 km southeast 	The development proposals are for 8 residential units and 1,115 sq m of commercial footprint.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Sedlescombe		SED0005 (Currently allocated in the relevant NP)	Land adjacent to St John the Baptist Church	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 12 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar¹⁴²: 11 km southeast 	The development proposals are for 8 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Sedlescombe		SED0006 (Currently allocated in the relevant NP)	Land at Gate Cottage	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 11.5 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 10.5 km southeast 	The development proposals are for 8 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Sedlescombe		SED0007 (Currently allocated in the relevant NP)	Land at Church Hill Farm	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 11.5 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 10.5 km southeast 	The development proposals are for 10 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Sedlescombe		SED0010	Street Farm, Sedlescombe	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 12 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 10.5 km southeast 	The development proposals are for 21 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>

¹⁴² Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
Sedlescombe		SED0011	Marley Lane Business Park, Marley Lane, Battle	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 10.5 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 11 km southeast 	The development proposals are for 2,400 sq m of commercial footprint.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Sedlescombe		SED0020	Land north of Gorselands, Sedlescombe	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 12 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar¹⁴³: 10.5 km southeast 	The development proposals are for 15 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Sedlescombe		SED0028	Land at Felon's Field, Marley Lane	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 11 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 11 km southeast 	The development proposals are for 3,000 sq m of commercial footprint.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Ticehurst		TIC0001	Cherry Tree Nursery, The Mount, Hawkhurst Road, Flimwell,	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 19 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 23 km southeast 	The development proposals are for 750 sq m of commercial footprint.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Ticehurst		TIC0003 (Currently allocated in the relevant NP)	Orchard Farm, Ticehurst Village	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 18 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 24 km southeast 	The development proposals are for 5 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>

¹⁴³ Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
Ticehurst		TIC0004 (Currently allocated in the relevant NP)	Singehurst, Pashley Road, Ticehurst Village	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 18 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 23.5 km southeast 	The development proposals are for 10 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Ticehurst		TIC0005 (Currently allocated in the relevant NP)	Wardsdown House, Flimwell	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 19 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar¹⁴⁴: 23 km southeast 	The development proposals are for 9 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Ticehurst		TIC0027	Land rear of Fruitfields, High Street, Flimwell	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 19 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 23 km southeast 	The development proposals are for 8 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Ticehurst		TIC0029	Junction of London Road and A268 (North)	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 19 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 23 km southeast 	The development proposals are for 20 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Ticehurst		TIC0030	Junction of London Road and A268 (South)	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 19 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 23 km southeast 	The development proposals are for 1,000 sq m of commercial footprint.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Ticehurst		TIC0043	Land at Cherry Tree Field, Ticehurst	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 18 km southwest 	The development proposals are for 16 residential units.	<p>No likely significant effect</p>

¹⁴⁴ Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
				<ul style="list-style-type: none"> Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 24 km southeast 		This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.
Ticehurst		TIC0044	Land at Steellands Farm, Ticehurst	<ul style="list-style-type: none"> Pevensey Levels SAC/Ramsar: 18 km southwest Dungeness Romney Marsh and Rye Bay SPA/Ramsar¹⁴⁵: 24 km southeast 	The development proposals are for 10 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Ticehurst		TIC0065	Land to the rear of Cherry Tree Nursery, Flimwell	<ul style="list-style-type: none"> Pevensey Levels SAC/Ramsar: 19 km southwest Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 23 km southeast 	The development proposals are for 20 residential units and 500 sq m of commercial footprint.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Ticehurst		TIC0083	The Weald Smokery, Hawkhurst Road, Flimwell	<ul style="list-style-type: none"> Pevensey Levels SAC/Ramsar: 19 km southwest Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 23 km southeast 	The development proposals are for 5 residential units and 100 sq m of commercial footprint.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Ticehurst		TIC0085	Land rear of Mark Lilly Garage, Hawkhurst Road, Flimwell.	<ul style="list-style-type: none"> Pevensey Levels SAC/Ramsar: 19 km southwest Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 23 km southeast 	The development proposals are for 20 residential units and 500 sq m of commercial footprint.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Westfield		HAF0002 (Currently allocated in the DaSA)	Land at Michael Tyler Furniture, Woodlands Way, Hastings	<ul style="list-style-type: none"> Pevensey Levels SAC/Ramsar: 13 km west Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 7 km east 	The development proposals are for 40 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any</p>

¹⁴⁵ Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment

Parish	Policy	HELAA Site Reference Number	Development Site	Designated Site Locations	Brief Summary	Screening Outcome
						designated site. The development is therefore not likely to have a significant effect on Habitats sites.
Westfield		WES0002 (Currently allocated in the DaSA)	Land at the former Moorhurst Care Home, Westfield	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 14 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 6.5 km east 	The development proposals are for 40 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Westfield		WES0003 (Currently allocated in the DaSA)	Land south-east of Goulds Drive, Westfield	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 13.5 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar¹⁴⁶: 7 km east 	The development proposals are for 10 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Westfield		WES0021	Moor Farm, Westfield	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 13.5 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 7 km east 	The development proposals are for 30 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>
Westfield		WES0040	Land on east side of Cottage Lane, Westfield	<ul style="list-style-type: none"> • Pevensey Levels SAC/Ramsar: 14 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 6.5 km east 	The development proposals are for 20 residential units.	<p>No likely significant effect</p> <p>This development lies a considerable distance from any designated site. The development is therefore not likely to have a significant effect on Habitats sites.</p>

¹⁴⁶ Note that this does not include the marine SPA extension as site-specific pathways to that part of the SPA/Ramsar site have already been scoped out of assessment.

Appendix B LSEs Policy Screening

7.14 Table 1 provides the LSE screening assessment of proposed policies contained within the Draft (Regulation 18) RLP. Where the LSEs screening outcome column is shaded orange, this indicates that impacts of the policy on Habitats Sites cannot be excluded and the site is screened in for Appropriate Assessment. Where this column is shaded green, there are no impact pathways present and the policy is screened out.

Table 4: LSE screening assessment of the proposed policies contained in the Draft (Regulation 18) RLP.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
Strategic Policies		
<p>Proposed Overall Development</p> <p>Strategy: Spatial</p>	<p>The Council will meet the local need for all forms of housing, jobs, facilities and services by strengthening Rother’s pattern of development through a landscape-led spatial development strategy that focuses on the ‘Live Well Locally’ concept. To achieve this, a minimum of [4,854 to 6,688]* dwellings, at an average rate of [243 to 335]* per year and a minimum of 74,189sqm* additional employment floorspace will be constructed by the end of the Plan period in 2040.</p> <p>Bexhill will continue to be a town that acts as a main transport and community hub. A network of settlements surrounding both Bexhill and Hastings (outside the local authority) will be able to access the two towns’ wider services and facilities by sustainable modes of transport.</p> <p>Rye and Battle will be the centre of clusters of settlements that collectively provide what most residents need for their daily lives. Rye and Battle will continue to be key transport and community hubs, with improved active and public transport, better connecting the cluster of settlements to the towns.</p> <p>There are opportunities for sensitive growth in these clusters alongside new facilities and services for both new and existing residents to benefit from.</p> <p>Based on these principles, the focus for growth will be in the following broad locations:</p>	<p>This proposed policy sets out the proposed strategy for residential and economic growth. It identifies an overall quantum and type of development. The associated identified sites (see Table 3) provide a quantum and spatial details of proposed developments.</p> <p>Potential linking impact pathways are:</p> <ul style="list-style-type: none"> • Atmospheric pollution, • recreational pressure, • water quality, • water quantity, level and flow. <p>This proposed policy is screened in for Appropriate Assessment.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<ul style="list-style-type: none"> - West and North Bexhill to consolidate Bexhill as the most sustainable town, within the capacities of the existing transport network; - clusters of villages based around the towns of Battle and Rye which act as key transport hubs; - settlements on radial routes connected to the main urban areas of Bexhill and Hastings, allowing sensitive development in locations that rely on the larger towns for services and facilities; - development at Hastings Fringes, providing sensitive growth; - urban intensification and redevelopment across the district in appropriate and sustainable brownfield site locations; - sensitive development in other rural settlements of the district; and - in the longer-term, sensitive growth along the A21 Corridor. <p>*The final housing and employment target will be minimum figures. For the Regulation 18 consultation, the overall housing figure includes sites which are 'potentially developable' where deliverability cannot yet be confirmed. Therefore, the top of the range is a maximum figure, on which we are requesting feedback through this consultation.</p>	
<p>Proposed Strategy: Sites for Gypsies, Travellers and Travelling Showpeople</p>	<p>Provision will be made for 23 permanent pitches within Rother for Gypsies and Travellers between 2021 and 2040. These will be delivered as follows:</p> <ul style="list-style-type: none"> ▪ 2021-2026: 9 pitches (14 pitches minus 5 pitches delivered since April 2021) ▪ 2026-2031: 4 pitches ▪ 2031-2036: 5 pitches ▪ 2036-2040: 5 pitches 	<p>This proposed policy sets out the proposed strategy for sites for Gypsies, Travellers and Travelling Showpeople. It identifies an overall quantum of pitches and therefore increased numbers of people.</p> <p>Potential linking impact pathways are:</p> <ul style="list-style-type: none"> • Atmospheric pollution, • recreational pressure, • water quality, • water quantity, level and flow.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<p>Sites will be allocated in the Local Plan to provide for this number of pitches, taking into account any pitches granted permission in the interim.</p> <p>Site selection will take into account the Local Plan objectives, the future needs of occupiers and the likely availability of sites for the intended occupiers. Sites should meet the criteria set in Policy HOU11 of the Local Plan.</p>	<p>This proposed policy is screened in for Appropriate Assessment</p>
<p>Green to the Core</p>		
<p>Proposed Policy GTC1: Net Zero Building Standards</p>	<p>(A) Operational Energy</p> <p>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 optimizing fabric first and orientation in order to optimize 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 optimizing electricity networks.</p> <ul style="list-style-type: none"> i) Residential development should achieve: <ul style="list-style-type: none"> a) LETI Total Energy Use Intensity (TEUI) Target for Operational Energy of 35 kWh/m b) For new buildings, a 4-star Home Quality Mark (HQM) score; or for conversions to residential development, a Building Research Establishment Environmental Assessment Method (BREEAM) 'Excellent' standard as minimum. c) A maximum space heating demand for new buildings (small scale housing) of 15 kWh/m² per year. d) If LETI, Home Quality Mark or BREEAM is updated or replaced during the plan period the equivalent replacement requirements will be applied. 	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<p>To demonstrate compliance, a Building Research Establishment (BRE) Home Quality Mark post-construction assessment or similar must be undertaken at practical completion.</p> <p>ii) Non-residential development (including building conversions) should achieve:</p> <p>a) A LETI TEUI Target for Operational Energy of:</p> <ul style="list-style-type: none"> - for offices – 55 kWh/m²/year (GIA); and - for industrial units (including warehouses), a feasibility statement to evidence a practicable TEUI Target. <p>b) A BREEAM 'Outstanding' standard as a minimum.</p> <p>(B) Embodied Carbon</p> <p>i) All residential development must achieve a LETI C rating for embodied carbon emissions, equating to 600 kgCO₂/m² total embodied carbon.</p> <p>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.</p> <p>ii) All office development should achieve a LETI C rating for office development, equating to 600 kgCO₂/m²/m² total embodied carbon.</p> <p>From 1 January 2030, a LETI A rating must be achieved, equating to 350 kgCO carbon.</p> <p>(C) Whole Life Carbon</p> <p>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.</p>	

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
<p>Proposed Policy GTC2: Net Zero Retrofit Standards</p>	<p>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.</p> <p>All proposed retrofit schemes must:</p> <ul style="list-style-type: none"> 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. <p>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.</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>
<p>Proposed Policy GTC3: Construction Materials and Waste</p>	<p>Development proposals will be required to demonstrate how they have implemented the principles and requirements set out below.</p> <ul style="list-style-type: none"> 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. 	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<p>iv) Space is provided and appropriately designed to foster greater levels of recycling of domestic and commercial waste.</p>	
<p>Proposed Policy GTC4: Water Efficiency</p>	<p>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.</p> <p>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).</p> <p>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.</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>
<p>Proposed Policy GTC5: Heat Networks</p>	<p>The Council will support district heat networks where feasible and where one exists, new development will be expected to connect to it.</p> <p>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.</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>
<p>Proposed Policy GTC6: Renewable and Low Carbon Energy</p>	<p>(A) Proposals for renewable and low energy generation will be supported and encouraged, subject to other Local Plan policies, where:</p> <p>i) They will not result in significant adverse impacts on landscape character that cannot be satisfactorily mitigated, including the High Weald National</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<p>Landscape; trees, woodland and hedgerows; agricultural land use and local heritage.</p> <p>ii) They will avoid unacceptable visual impact from the effect of glint and glare on the landscape, on neighbouring uses and aircraft safety.</p> <p>iii) They have a direct benefit to the local community. Proposals for community led initiatives, including those proposed through Neighbourhood Planning should be supported.</p> <p>In addition, the following criteria will be used to assess specific generation types:</p> <p>Solar</p> <p>(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.</p> <p>Wind</p> <p>(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.</p> <p>Energy Storage</p> <p>(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.</p>	<p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
<p>Proposed Policy GTC7: Local Nature Recovery Areas</p>	<p>All development must meet the objectives of the East Sussex (including Brighton & Hove) Local Nature Recovery Strategy, taking opportunities to deliver ecological networks and green infrastructure.</p> <p>Development will need to demonstrate that:</p> <ul style="list-style-type: none"> i) it will not harm or adversely affect an area or areas identified as being of importance for biodiversity or as areas that could become of importance for biodiversity (opportunities for nature recovery); ii) it will maximise opportunities to improve these areas; and iii) it directs Biodiversity Net Gain to where it can be of most benefit. 	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>
<p>Proposed Policy GTC8: Biodiversity Net Gain</p>	<p>All qualifying development proposals must deliver at least a 20% measurable biodiversity net gain attributable to the development. The net gain for biodiversity should be calculated using Defra’s Statutory Biodiversity Metric.</p> <p>Biodiversity net gain must be provided on-site wherever possible. Off-site provision will only be considered where it can be demonstrated that, after following the biodiversity gain hierarchy, all reasonable opportunities to achieve measurable (and where possible significant net gains) on-site have been exhausted or where greater gains can be delivered off-site where the improvements can be demonstrated to be deliverable and are consistent with the Local Nature Recovery Strategy.</p> <p>Development will need to demonstrate through a Biodiversity Gain Plan that measurable and meaningful net gains for biodiversity will be achieved and will be secured and managed appropriately.</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<p>Proposals for biodiversity net gain will also need to be in accordance with policies GTC7: Local Nature Recovery Strategies; ENV5: Habitats and Species and HWB5: Green and Blue Infrastructure.</p>	
<p>Proposed Policy GTC9: High Weald National Landscape</p>	<p>All development within or affecting the setting of the High Weald National Landscape (AONB) shall conserve and seek to 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 the latest version of the High Weald AONB Management Plan.</p> <p>Development within the High Weald National Landscape should be small-scale, in keeping with the landscape and settlement pattern, and designed in a way that reflects its nationally-designated status as landscape of the highest quality, following the guidance in the High Weald AONB Housing Design Guide and Colour Study. Major development should not take place in the AONB save in exceptional circumstances as outlined at paragraph 183 of the NPPF.</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>
<p>5. Live Well Locally</p>		
<p>Proposed Policy LWL1: Compact Development</p>	<p>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:</p> <ul style="list-style-type: none"> a. Urban areas in Bexhill, Battle and Rye: 60-90+ dph, with higher densities around transport hubs and town and district centres. b. Suburban areas in Bexhill, Battle, Hasting Fringes and Rye: 45-75 dph. 	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<p>c. Live well locally areas: 45-60 dph.</p> <p>d. Villages areas (villages with development boundaries): 25-45 dph.</p> <p>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.</p> <p>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.</p> <p>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.</p>	
<p>Proposed Policy LWL2: Facilities and Services</p>	<p>(A) All development proposals for one or more new dwellings must meet the following criteria:</p> <p>i) Accessible Centres.</p> <p>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:</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<ul style="list-style-type: none"> a. A food shop which sells fresh fruit and 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 <p>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.</p> <p>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.</p> <p>ii) Public Squares and 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.</p>	

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<p>iii) Play, Sports, Food Growing Opportunities and 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.</p> <p>(B) All development proposals of more than 150 dwellings must meet the following criteria:</p> <p>a. 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.</p>	
<p>Proposed Policy LWL3: Facilities and Services</p>	<p>(A) All development proposals for one or more new dwellings must meet the following criteria:</p> <p>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.</p> <p>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</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

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	<p>Plans and the East Sussex Local Transport Plan, evidenced through the submission of a Transport Assessment that:</p> <ul style="list-style-type: none"> 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, 18 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. <p>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:</p> <ul style="list-style-type: none"> a. Secure and overlooked cycle parking and facilities (including hire). b. Seating provision. c. Lighting. 	

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<ul style="list-style-type: none"> 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. <p>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).</p> <p>(B) All development proposals of more than 50 homes must meet the following criteria:</p> <ul style="list-style-type: none"> i) High-quality Walking and Wheeling Routes. Provide (if they do not already exist) a high-quality walking and wheeling route from the site to: <ul style="list-style-type: none"> 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); c. a shop selling mostly essential goods or services which benefit the community e.g., medical services; and 	

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	<p>d. Open green or blue space.</p> <p>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:</p> <p>a. Be 2m wide (with limited pinch points of 1.5m due to street furniture) and localised widening to accommodate peak usage.</p> <p>b. Step-free.</p> <p>c. Have a smooth, even surface.</p> <p>d. Have street lighting in line with the Institution of Lighting Professionals Towards a Dark Sky Standard.</p> <p>e. Include appropriate crossings in compliance with standards set out in LTN 1/20 and Inclusive mobility.</p> <p>f. Have frequent seating provision.</p> <p>g. Have navigable features for those with visual, mobility or other limitations.</p> <p>h. Routes incorporating 'Greenways', 'Quietways' and upgrades to existing or the provision of new Public Rights of Way (PROW) will be supported and encouraged.</p> <p>ii) 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</p>	

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<p>new or improved off site routes must be safe for cyclists of all abilities, ages, and mobility needs.</p>	
<p>Proposed Policy LWL4: Walking, Wheeling, Cycling & Public Transport (Within the Site)</p>	<p>(A) All development proposals for one or more new dwellings must meet the following criteria:</p> <ul style="list-style-type: none"> 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. <ul style="list-style-type: none"> 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 and 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 	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. It is noted that this proposed policy could provide for increased recreational pressure in sensitive Habitat Sites, however, no routes are specified. This proposed policy also has the ability to reduce atmospheric pollution by enhancing non carbon transport routes.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<p>safe provision for both walking, wheeling and cycling counts as a walking, wheeling and cycling access point.</p> <p>v) 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.</p> <p>vi) 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.</p> <p>vii) 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.</p> <p>viii) 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.</p> <p>ix) 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.</p>	

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<p>x) Shared Mobility. Integrate provision of infrastructure for Demand Responsive Transport, car clubs and car shares as well as Park and Ride schemes, if introduced.</p> <p>xi) Zero Emission Vehicles. Integrate provision of infrastructure for rapidly advancing electric car and other zero emission technology.</p>	
<p>Proposed Policy LWL5: Distinctive Places</p>	<p>All development proposals for one or more new dwellings must meet the following criteria:</p> <p>i) Response To Site, Character and 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 and 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.</p> <p>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.</p> <p>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</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>Development proposals brought forward under this proposed policy will require an HRA.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<p>the High Weald National Landscape Management Plan and the High Weald AONB Design Guide and Colour Study.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>vii) 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.</p> <p>viii) 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:</p> <p>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</p>	

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<p>will contribute to the social, economic, and environmental well-being of the community.</p> <p>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 participatory methods, co-design, co-production, and co-management.</p> <p>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.</p> <p>ix) 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.</p> <p>x) 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.</p>	

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<p>Proposed Policy LWL6: Built Form</p>	<p>(A) All development proposals for one or more new dwellings must meet the following criteria:</p> <ul style="list-style-type: none"> 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 level 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: <ul style="list-style-type: none"> 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. 	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>This proposal is a developed management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

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	<p>iii) Legibility and Street Hierarchy. Promote good legibility in the following ways:</p> <ul style="list-style-type: none"> 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. <p>iv) 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.</p> <p>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.</p> <p>v) 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).</p>	

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	<p>vi) 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.</p> <p>vii) 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.</p> <p>(B) All major housing developments must have 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.</p>	
<p>Proposed Policy LWL7: Streets for All</p>	<p>(A) All development proposals must meet the following criteria:</p> <p>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.</p> <p>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.</p> <p>They must be adopted, managed, and resourced as public open space rather than as public highway with its conventional emphasis upon motorised traffic movement.</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>This is a strategic policy and although the proposal specifies a quantum of development there is no spatial allocation within the proposed policy.</p> <p>There are no impact pathways present and the proposed policy is screened out from Appropriate Assessment.</p>

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	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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 Sustainable Drainage Systems (SuDS). Landscape</p>	

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	<p>elements such as street trees must not be prejudiced by lighting columns or underground ducting. 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.</p> <p>x) Healthy Streets. Address the ten 'Healthy Streets' indicators of the "Healthy Streets Toolkit," as endorsed by the East Sussex LTP4.</p> <p>xi) 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.</p> <p>(B) All development of more than 150 dwellings or 1500sqm of commercial floorspace must meet the following criteria:</p> <p>xii) 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.</p>	
<p>Proposed Policy LWL8: Multimodal Parking</p>	<p>All development proposals must meet the following criteria:</p> <p>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).</p> <p>a. Residential Cycle Parking. Secure, covered, well-lit cycle storage for all new dwellings, including flats, must be located close to people's</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>This is a strategic policy and although the proposal specifies a quantum of development there is no special allocation within the proposed policy.</p> <p>There are no impact pathways present and the proposed policy is screened out from Appropriate Assessment.</p>

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	<p>front doors so that cycles are as convenient to choose as a car for short trips and easily accessible from the dwelling.</p> <p>b. Non-residential cycle Parking. Secure, overlooked, well-maintained, well-lit cycle parking must be located closer to the entrance of schools, commercial, leisure and 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.</p> <p>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.</p> <p>iii) On Street Parking.</p> <p>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.</p> <p>b. Landscape-led design with layout and materials responding to the landscape character of the place.</p> <p>c. Maximise opportunities for enhancing green infrastructure and sustainable drainage.</p>	

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<ul style="list-style-type: none"> 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. <ul style="list-style-type: none"> 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 	

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	<p>gravel) which will allow sustainable drainage, raising the environmental quality of the scheme.</p> <p>vi) Car Parking Courts. Rear car parking courts serving houses must be avoided where possible.</p> <p>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.</p> <p>viii) Parking Squares. Parking squares designed with robust materials to function as attractive public spaces which also accommodate parked cars.</p> <p>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.</p> <p>ix) Communal Remote Car Parking.</p> <p>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.</p> <p>b. These communal blocks must be located within a short and convenient walking distance of the buildings it serves.</p>	

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	<ul style="list-style-type: none"> 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. <ul style="list-style-type: none"> 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. 	

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	<p>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.</p> <p>xii) 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.</p>	
<p>7. Development Strategy</p>		
<p>Proposed Policy DEV1: General Development Considerations</p>	<p>In addition to considerations set out by other policies, all development should meet the following criteria:</p> <p>i) It meets the needs of future occupiers, including providing appropriate amenities and the provision of appropriate means of access for disabled users;</p> <p>ii) It does not unreasonably harm the amenities of adjoining properties;</p> <p>iii) It respects and does not detract from the character and appearance of the locality; and</p> <p>iv) It is compatible with both the existing and planned use of adjacent land and takes full account of previous use of the site.</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

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<p>Proposed Policy DEV2: General Development Considerations</p>	<p>Planning applications (whether in outline or full format) must relate to an entire development site to ensure a comprehensive approach, including where sites are in multiple ownerships.</p> <p>When an outline application is submitted, a masterplan defining key parameters for the entire site must be submitted by the applicant to indicate how the overall development of the site can be achieved.</p> <p>In circumstances, where it would speed up delivery, a planning application for part of a larger site may be permitted, but only where it demonstrably has regard to, and facilitates, an integrated scheme for development of the entire site through, a masterplan defining key parameters for the entire site as above.</p> <p>In applying this policy, regard will be had to all relevant policies in this Local Plan to ensure appropriate provision, across the entire development site, of land uses, affordable housing, sustainable transport and access, green infrastructure (including biodiversity net gain and sustainable drainage) and other infrastructure (secured directly or through funding contributions).</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>
<p>Proposed Policy DEV3: General Development Considerations</p>	<p>Development boundaries define the area within sustainable settlements where development will be permitted, provided it is consistent with this Local Plan.</p> <p>Priority shall be given to reuse of brownfield sites, in order to make efficient use of previously developed land in sustainable settlements. Some greenfield development will be necessary in order to deliver housing and employment need, but this will be limited to inside development boundaries.</p> <p>In the countryside (that is, outside of defined development boundaries), development shall be limited to that which accords with specific Local Plan policies or that for which a countryside location is demonstrated to be necessary.</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

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	<p>Brownfield development will be prioritised, in order to make efficient and sustainable use of previously developed land.</p>	
<p>Proposed Policy DEV4: Retention of Sites of Community or Economic Value</p>	<p>Proposals that involve the loss or diminution of sites of community or economic value, including those last in such use, must demonstrate that there is no reasonable prospect of a continued use, backed by:</p> <ul style="list-style-type: none"> i) Evidence of a comprehensive and sustained marketing campaign, which clearly indicates a lack of demand for the existing use (or as an alternative economic use where the existing use is economic, or alternative community use in the case of an existing community facility), based on marketing, normally at least 18 months, that offers the land or unit/s for sale, or rental, at a realistic valuation of the site/premises for that use; and ii) an independent viability assessment that clearly demonstrates that the unit is not or is not capable of being financially viable, including alternative economic or community facilities, where appropriate. <p>Proposals should not result in the loss of facilities or features which may undermine the viability of its use, including, but not limited to, car parks, gardens and function rooms.</p> <p>*This includes a community facility, public house, local shops, tourist accommodation or attractions, and an employment use.</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>
<p>Proposed Policy DEV5: Development of Small Sites and Windfall</p>	<p>A target of 20% of housing delivery will be delivered on small/medium sites (less than one hectare in size) across the district in each year throughout the plan period. This is supported by evidence of historic windfall delivery of small sites (one to four dwellings) coming forward, and the identification of medium sized sites (five to ten dwellings) (this comprises sites that can accommodate five or more dwellings, but on a site size less than one hectare) in the HELAA.</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p>

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	<p>There is clear potential for small/medium sites to be delivered through the neighbourhood planning process, evidenced by site availability in the HELAA.</p> <p>These sites will be an important source of residential growth within sustainable settlements.</p> <p>A windfall development projection of 39 dwellings per annum has been projected for the plan period:</p>	<p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>
<p>Proposed Policy DEV6: Strategic Green Gaps</p>	<p>Within Strategic Green Gaps, development will be carefully controlled. Developments will only be permitted where they are unobtrusive and do not detract from the openness of the area having regard to the particular objectives of the gaps, as follows:</p> <ul style="list-style-type: none"> i) to maintain the separate identity and distinctiveness between settlements; ii) to maintain the strategic settlement pattern; and iii) to prevent the coalescence of settlements. <p>Enhancement of the gaps through effective landscape management which strengthens and reinforces their significance as protected landscape areas will be supported.</p> <p>The extent of each of the five strategic gap areas is described below:</p> <p>Bexhill and Hastings/St Leonards Strategic Green Gap</p> <p>The Gap between the two towns is relatively small, being particularly narrow along the A259 corridor, and hence any encroachment would be significant. It's location and accessibility means that it is highly vulnerable to development pressure. The accessibility of the Gap between Bexhill and Hastings has changed with the construction of Combe Valley Way, which increases the vulnerability of the countryside between Bexhill and</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

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	<p>Hastings/St Leonards. The Gap includes the Combe Haven valley and its tributary valleys in order to protect this open landscape between the two settlements.</p> <p>Crowhurst and Hastings/St Leonards Strategic Green Gap</p> <p>The construction of Combe Valley Way has increased the vulnerability of the Gap between Hastings/St Leonards and the village of Crowhurst. The area between the built-up edge of Crowhurst and the Hastings to London railway line is also included as it contributes to the open area between the settlements.</p> <p>Battle and Hastings/St Leonards Strategic Green Gap</p> <p>The Gap between Battle and Hastings/St Leonards provides an important function in maintaining the separate identities of Battle and the built-up area of Hastings/St Leonards. The break in the ribbon development between the edge of Telham and the Hastings Borough boundary at Breadsell Farm is highly vulnerable to change particularly in more open areas and the higher ground and ridges.</p> <p>Fairlight and Hastings Strategic Green Gap</p> <p>The Gap between the Hastings Borough boundary and the edge of Fairlight Cove provides an important function in protecting the general openness of the area between the Hastings Country Park and the edge of the settlements of Fairlight and Fairlight Cove. The area south of Battery Hill and Hill Road and to the east of Coastguard Lane, including The Close, is vulnerable to incremental change and infill development; hence, it is also included to conserve the area's open character.</p> <p>Rye and Rye Harbour Strategic Green Gap</p> <p>The open Gap between Rye citadel and Harbour Road industrial area/Rye Harbour village provides an important function in retaining their distinct identities. The area is fragile and vulnerable to encroaching development, as well as incremental changes in landscape</p>	

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	<p>management. The retention and protection of this Gap is important to the conservation and enhancement of local landscape character and views, notably with regard to the setting of the Citadel. The Gap also incorporates the sensitive riverside margin adjacent to the River Brede and River Rother.</p>	
<p>7. Health and Wellbeing</p>		
<p>Proposed Policy HWB1: Supporting Health and Wellbeing</p>	<p>New or improved physical health, mental health and other wellbeing facilities and services which meet population needs and are accessible will be supported, and will be addressed through development site allocations, planning permissions and/or developer contributions in accordance with the latest Rother Infrastructure Delivery Plan.</p> <p>The design and function of new development must help to create healthy, inclusive and safe places which reduce health inequalities, support and address the health and wellbeing needs in Rother as identified in the Joint Strategic Needs Assessment.</p> <p>In order to maximise opportunities to enable healthy lifestyles and equality for all, new development must demonstrate how it will:</p> <ul style="list-style-type: none"> i) meet the principles of high quality design that is safe and secure and support Rother's Overall Priority to 'Live Well Locally' through ensuring, accessible and inclusive layout and design which uses appropriate materials and ensures community safety and cohesion; ii) avoid or mitigate unacceptable harmful impacts and health risks from air, noise, light and odour pollution; iii) maximise opportunities for physical activity through the creation and improvement of high quality open space, play and recreation and 	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

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	<p>incorporate biodiversity and green and blue infrastructure to enable climate change resilience (in line with Policies HWB5 and ENV5);</p> <p>iv) be supported by necessary infrastructure provision, including prioritising the use of accessible sustainable and active transport measures which improve access and link developments to key services and facilities reducing social isolation, enabling active lifestyles and improving social cohesion and connectivity; and</p> <p>v) provide space for food growing both within in community gardens, allotments and/or private gardens to ensure food security.</p>	
<p>Proposed Policy HWB2: Health Impact Assessments</p>	<p>A Health Impact Assessment must be submitted with applications for development (including change of use) equal to or exceeding:</p> <ul style="list-style-type: none"> i) 100 dwellings; ii) 2,000sqm of non-residential floorspace; or iii) a site of 5 hectares. <p>A Health Impact Assessment screening will be required for all applications related to major development in wards of the district that are within the 20% most deprived nationally in the Index of Multiple Deprivation. Major development is defined as that classed under the Development Management Procedure Order (and any subsequent amendments)). This screening process will ensure that localised health and wellbeing issues are addressed.</p> <p>A Health Impact Assessment will need to demonstrate both the individual and cumulative impacts of the proposal as set out in the supporting text to this policy.</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

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<p>Proposed Policy HWB3: Reducing Harmful Impacts on Health</p>	<p>Applications for new development or change of use for the following uses (currently defined as sui generis) will be required to demonstrate that the proposal would have no negative impact on the health and wellbeing of the local population. The potential proliferation (the number and percentage in a defined area) of these uses would also be a consideration in the decision-making process:</p> <ul style="list-style-type: none"> i) Betting shops; ii) Casinos; iii) Pay day loan shops; and iv) Hot food takeaways. <p>In relation to hot food takeaways, applications within 400m of the boundary of a school or park will not be considered favourably, and opening times may need to be controlled (on a case-by-case basis via condition), where deemed reasonable and necessary.</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>
<p>Proposed Policy HWB4: Community Facilities and Services</p>	<p>The provision or improvement of community facilities and services to meet local needs will be achieved by:</p> <ul style="list-style-type: none"> i) Permitting new, improved or replacement community and social facilities and services in appropriate accessible locations where they meet identified community needs, having regard to population characteristics and recognised standards of provision. ii) Facilitating the co-location of facilities to form community hubs and meet the evidenced needs of a broad a range of community activities, as far as reasonably practicable, particularly when considering new buildings. 	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

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	<p>iii) Not permitting development that would result in the loss of sites or uses currently or last used as community and social facilities and services unless the proposal meets the tests of Policy DEV4 – Retention of Sites of Community or Economic Value.</p> <p>iv) Where deemed reasonable and necessary, the Council will remove certain permitted development rights via condition to restrict the ability of an approved use to change to one that does not function as a community facility or service.</p> <p>Footnote: The definition of community facilities and services comprises medical, health and social services; local shops and halls, and a wide range of arts, culture, education, leisure, recreation, religious facilities (categorised as C2, E(d) – (f), F1, F2 as well as pubs, bingo halls, cinemas, concert halls, dance halls, night-clubs, theatres and venues for live music performance, as defined as sui generis in the current Use Classes Order).</p>	
<p>Proposed Policy HWB5: Green and Blue Infrastructure</p>	<p>Green and blue infrastructure will be designated on the Local Plan’s Policies Maps.</p> <p>These designations will be determined through a new green and blue infrastructure study, which will be carried out following consultation on this draft Local Plan. It will form part of the submission version of the Local Plan.</p> <p>The protection, enhancement and provision of green and blue infrastructure, including sufficient, well-managed and accessible, sports and recreation spaces, both formal and informal, will be achieved by:</p> <p>i) Safeguarding existing green and blue infrastructure (designated through this Local Plan’s Policies Map) from development, and only permitting its loss where it results in improved provision (in terms of quantity and quality) as part of a redevelopment or elsewhere within the locality.</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>This is a positive policy as the creation, retention and enhancement of Green and Blue infrastructure has the potential to divert recreational activities away from sensitive Habitats Sites.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<ul style="list-style-type: none"> <li data-bbox="443 300 1240 357">ii) Permitting proposals for the improvement of existing, or provision of new, green and blue infrastructure, in localities where deficits are identified. <li data-bbox="443 400 1240 959">iii) Requiring development proposals to respond to and incorporate existing green and blue infrastructure, and integrate new, into design proposals, including providing links to existing green and blue infrastructure outside the development's boundaries. The quantum of green and blue infrastructure provided should be based on applying: <ul style="list-style-type: none"> <li data-bbox="539 603 1240 719">a. the recommendations of Rother's Playing Pitch and Built Facilities Strategy and Sport England's standards, across all relevant spaces within the district (and any successor or other documents as identified as relevant by the Council); <li data-bbox="539 767 1240 825">b. the Natural England Green Infrastructure Framework and its Principles and Standards; <li data-bbox="539 873 1240 959">c. Securing either direct provision of new or financial contributions towards improvements to existing green and blue infrastructure to ensure adopted standards are maintained within the locality; <li data-bbox="443 1007 1240 1093">iv) Requiring developments of more than two hectares or 50 dwellings (whichever is the smaller) to produce a Green Infrastructure masterplan as part of their proposals. <li data-bbox="443 1141 1240 1227">v) Requiring developments of more than 300 dwellings to provide playing pitches on site in line with the recommendations of Rother's Playing Pitch and Built Facilities Strategy and Sport England's standards. <li data-bbox="443 1275 1240 1361">vi) Giving particular support for sensitive water-based recreation along the coast and in any other bodies of water, having due regard to biodiversity, environmental and amenity considerations. This includes any cross- border 	

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<p>recreation activities that will benefit from waters within Rother which should be detailed in a cross-border management plan.</p>	
<p>Proposed Policy HWB6: Public Rights of Way</p>	<p>New public rights of ways and any other public networks such as the National Cycle Network and greenways will be supported, subject to protecting habitats sensitive to recreational pressures (see Policy ENV6: Sustainable Access and Recreation Management Strategy) and other policies within this Local Plan.</p> <p>They will be particularly welcome, where there is a local deficiency in terms of access or a lack of connectivity to settlements, visitor attractions and facilities and services or between rights of way.</p> <p>Any current public rights of way will be protected by ensuring that development does not cause an adverse impact. Where any planning application involves a public right of way, or is in close proximity to one, proposals must demonstrate the measures taken to maintain, enhance and/or enable access to the existing public right of way network for all ages and abilities, including where a public right of way runs adjacent to the proposed site. This includes considering the character, quality, and public enjoyment of the network, as well as the specific needs of different users.</p> <p>If any alterations to a public right of way are proposed, to demonstrate the overriding benefit of doing so. In the circumstances that an alteration is considered acceptable, the mitigation will involve at a minimum providing the same level and scale of access as was already existing. This will likely be secured through planning obligations/legal agreement.</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>This proposal is for a positive policy as the creation, retention and enhancement of PRoW has the potential to divert recreational activities away from sensitive Habitats Sites.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>
<p>Proposed Policy HWB7: Combe Valley Countryside Park</p>	<p>Land between Bexhill and St. Leonards, from Galley Hill and the coast in the south to Crowhurst to the north, as shown on the Policies Map, is allocated as the Combe Valley Countryside Park (CVCP).</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for this strategic gap, it does not provide for any specific development.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<p>The CVCP acts, in part, as a strategic gap between Hastings/St Leonards and Bexhill. It also increases access to the countryside for both the residents and visitors alike through improvements to, and promotion of, the rights of way network.</p> <p>Within the CVCP, proposals will only be acceptable where they:</p> <ul style="list-style-type: none"> i) are small in scale and supported by the CVCP Community Interest Company and its strategy for the Park; ii) support usage of the Park as a key open space for Bexhill and Hastings and their wider catchment; iii) provide for the proper conservation and, where appropriate, management of the land-based and marine designations within it and create biodiversity net gains within the Park; and iv) accord with the provisions set out in Policy DEV6 (Strategic Green Gaps). 	<p>The Countryside Park has the potential to divert recreational activities away from sensitive Habitat Sites.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>
Strategic Infrastructure Requirements		
<p>Proposed Policy INF1: Strategic Infrastructure Requirements</p>	<p>Where new or improved infrastructure, including community facilities, is needed to support development, appropriate provision or contributions will be required. This will be established in consultation with relevant infrastructure providers, and as set out in the Council's Infrastructure Delivery Plan.</p> <p>The delivery of infrastructure will be secured by planning obligation or by condition attached to the planning permission, or by any other appropriate mechanism such as the Community Infrastructure Levy.</p> <p>Timing and Delivery of Infrastructure</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

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	<p>Planning permission will only be granted where it can be demonstrated, through the submission of appropriate evidence, that there is, or will be, sufficient infrastructure capacity to meet all the necessary requirements arising from the development. Where new infrastructure capacity is required, it must be demonstrated that it can be delivered upfront or early in the development phasing.</p> <p>Applications must set out all the infrastructure implications of a proposal and how they have engaged and worked with infrastructure providers. This includes infrastructure that is required to be delivered both on or off-site. If infrastructure cannot be delivered upfront or early in the development timescale, an agreed timetable, secured through planning condition or legal agreement will need to be in place so that the infrastructure can be delivered as soon as practically possible.</p> <p>Larger developments may need to be phased to ensure that infrastructure can be provided in a timely manner. The design and layout of a development must ensure future access to utility infrastructure for maintenance and upgrading.</p> <p>Where a proposal would be made unviable in light on infrastructure requirements, open book calculations verified by an independent consultant approved by the Council must be provided. All viability appraisals will be made at the developers cost to ensure the value of planning obligations has been maximised, having regard to development viability.</p> <p>Safeguarding of Infrastructure</p> <p>It is important that existing infrastructure services, facilities and utilities are protected where they contribute to the needs of local communities. This is unless an equivalent replacement/improvement is provided or there is sufficient alternative provision of the same type in the local area, subject to requirements set out elsewhere in the Plan. Replacement facilities must be provided to at least the same standard which includes floorspace, volume, functionality and purpose.</p>	

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<p>Proposed Policy INF2: Digital Connectivity</p>	<p>Major residential and non-residential development will be required to provide a Fibre to the Premise (FTTP) connection. Where the applicant deems this to not be feasible, evidence will need to be provided to demonstrate this for the consideration of the Council. In circumstances where it is agreed that FTTP cannot be delivered, the next most feasible fastest broadband speed will be provided.</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>
<p>Housing</p>		
<p>Proposed Policy HOU1: Mixed and Balanced Communities</p>	<p>In order to support mixed, balanced and sustainable communities, housing developments will be considered in accordance with the following criteria and subject to other Local Plan policies:</p> <ul style="list-style-type: none"> i) subject to the other criteria in this policy, all housing developments must be of a size, type and mix which will contribute to meeting both current and projected housing needs within the district and locally; ii) in all housing developments that include market housing, at least 30% of the market housing shall comprise one and two bedroom dwellings (being mostly two bed); iii) in relation to affordable housing, the exact mix of housing sizes and types shall be identified through discussions with the District Council. The starting point for discussions is that the majority of dwellings for social or affordable rent and First Homes shall be of one and two bedrooms and the majority of intermediate affordable dwellings for sale shall be of two and three bedrooms, subject to identified local affordable housing needs; iv) in larger developments (six or more units), a mix of housing sizes and types to meet the needs of a range of differing households must be 	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

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	<p>provided, unless the particular characteristics of the proposal or site makes this inappropriate;</p> <p>v) other than in exceptional circumstances, proposals that would result in a net loss of dwellings numbers (for example conversion of flats into a single dwelling) will be resisted; and</p> <p>vi) proposals for Build-to-Rent accommodation, including as part of wider housing developments, will usually be supported in areas well-served by public transport, subject to other Local Plan policies. A minimum of 20% of Build-to-Rent accommodation will be required to be provided as affordable private rent homes (and maintained in perpetuity), as set out in the Planning Practice Guidance.</p>	
<p>Proposed Policy HOU2: Affordable Housing</p>	<p>Affordable housing will be sought on all qualifying housing development sites.</p> <p>On housing sites or mixed-use developments delivering a net increase of six or more dwellings within the High Weald National Landscape and ten or more dwellings outside the High Weald National Landscape, or where the site has an area of 0.5 hectares or more outside the High Weald National Landscape, a minimum of X percent of the gross number of residential units must be provided as on-site affordable housing provision, unless off-site provision or an equivalent financial contribution in lieu can be robustly justified.</p> <p>Developments providing a level of affordable housing in excess of these minimum proportions will be considered favourably in accordance with other Local Plan policies.</p> <p>Where a site-specific viability assessment demonstrates the minimum requirements set out above cannot viably be met as part of an otherwise suitable development, the proportion of affordable housing must be the most that does not undermine viability. The Council will secure a review mechanism through a planning obligation requiring viability to be reassessed, at the developer's expense, over the lifetime of the development, to</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<p>ensure that the maximum affordable housing contribution viable, up to the policy requirements, is provided.</p> <p>Of the affordable dwellings provided, the exact tenure mix shall be identified through discussions with the local authority and informed by the latest Government guidance and any relevant local Housing Need Assessment. The starting point for discussions will be based on the following mix:</p> <ul style="list-style-type: none"> - 25% First Homes (where required in accordance with national policy) - 58% Social/ Affordable Rented (with priority given to maximising social rent). - 17% Other Affordable Home Ownership. <p>Local eligibility criteria for First Homes, such as a lower income cap than that set out in national policy, a local connection test or criteria based on employment status may be applied on a case-by-case basis where this is justified by a local need, in accordance with national policy.</p> <p>The different housing tenures to be provided on site (market housing, affordable housing for rent and affordable housing for sale) should be well-integrated and designed to the same high quality to create tenure-neutral and socially inclusive homes and spaces. The affordable housing should be apportioned individually or in small clusters and where this is not proposed it should be robustly justified.</p> <p>In all cases, planning permission will be subject to a planning obligation to clarify definitions, tenure split and nomination rights and to ensure the affordable housing remains as such in perpetuity (allowing for staircasing provisions for shared ownership homes as appropriate).</p>	

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<p>Proposed Policy HOU3: 100% Affordable Housing Developments</p>	<p>Developments comprised exclusively of affordable housing will be supported subject to other Local Plan policies (including Policy HOU1) and the following criteria:</p> <ul style="list-style-type: none"> i) The site location accords with the Live Well Locally policies including in relation to access to services and public transport. ii) A mix of affordable housing tenures should be provided. The exact tenure mix of the affordable dwellings shall be identified through discussions with the local authority and informed by the latest Government guidance and relevant assessment of local housing need, having regard to the significant need for social/affordable rented dwellings throughout the district, as well as local and site circumstances. iii) The different affordable housing tenures to be provided should be designed to the same high quality to create tenure-neutral and socially inclusive homes and spaces. The different tenures should be in small clusters and where this is not proposed it should be robustly justified. iv) In all cases, planning permission will be subject to a planning obligation to clarify definitions, tenure split and nomination rights and to ensure the affordable housing remains as such in perpetuity. 	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>
<p>Proposed Policy HOU4: Allocating Sites for Wholly or Substantially Affordable Housing</p>	<p>In order to meet identified local need for affordable housing, specific sites may be allocated through Neighbourhood Plans for wholly or substantially affordable housing either within development boundaries or otherwise close to local services including public transport connections, and subject to other Local Plan policies. Affordable housing provided on these sites should remain available in perpetuity.</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

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<p>Proposed Policy HOU5: Rural Exception Sites</p>	<p>In exceptional circumstances, planning permission may be granted for small scale residential development outside development boundaries in order to meet a local need for affordable housing in rural areas. Such development will be permitted where the following requirements are met:</p> <ul style="list-style-type: none"> i) it helps to meet a proven local housing need for affordable housing in the village/parish by addressing the needs of the local community through accommodating households who are either current residents or have an existing family or employment connection, as demonstrated in an up-to-date assessment of local housing need; ii) it is of a size, tenure, mix and cost appropriate to the assessed local housing need; iii) it is well related to an existing settlement and its services, in accordance with the Live Well Locally policies including access to public transport; iv) the proposal demonstrates that there has been meaningful community engagement throughout the development process and the benefits of the development to the village/parish are clearly defined; v) the local planning authority is satisfied that the identified local housing need cannot be met within the settlement's development boundary; and vi) the development does not significantly harm the character of the rural area, settlement or the landscape, and meets other normal local planning and highway authority criteria, in line with other Local Plan policies. <p>In all cases, planning permission will be subject to a planning obligation to ensure that the affordable housing accommodation remains available to meet local housing needs in</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<p>perpetuity, and that people with the greatest local connection are given highest priority in both initial and future occupancy.</p> <p>A small amount of enabling open market housing will be acceptable where it is demonstrated, with viability evidence, that it is the minimum necessary for the delivery of a suitable scheme, having regard to the criteria above.</p>	
<p>Proposed Policy HOU6: Sub-division of Dwellings, and Houses of Multiple Occupation (HMOs)</p>	<p>Within the Development Boundaries, proposals involving the subdivision of a larger dwelling (C3 use) into smaller dwellings, and proposals for new Houses of Multiple Occupation (HMOs), will be supported, subject to other Local Plan policies and the following criteria:</p> <ul style="list-style-type: none"> i) all units of accommodation resulting from the subdivision or conversion will provide an acceptable level of amenity for future occupiers in accordance with Policy DEV1; ii) all units of accommodation resulting from the subdivision or conversion will comply with the housing standards set out in Local Plan policies and/or licensing requirements (whichever is relevant to the type of development), including in relation to Internal Space Standards and External Residential Areas including (and not limited to) in terms of provision for car and cycle parking and waste and recycling; iii) the proposal is appropriate in terms of the impacts on the amenities of occupants of nearby properties; iv) proposals for HMOs contribute towards the provision of mixed and balanced communities and do not result in an over-concentration of such uses in a particular area; v) planning applications for a HMO are accompanied by a detailed management scheme to demonstrate how the HMO will be appropriately 	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

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	<p>managed, having regard to the need to protect the amenity of the local area and of future occupiers. Compliance with an acceptable management scheme will be secured through a planning condition or</p> <ul style="list-style-type: none"> vi) planning obligation; vii) any alterations or extensions to the host building to facilitate the sub-division are in accordance with Policy HOU17; viii) any conversion, alteration or extension works to the host building to facilitate the sub-division include measures which will improve energy efficiency and sustainable construction, in accordance with the policies of the Green to the Core chapter; and ix) proposals involving the change of use of a non-residential use to a dwelling or HMO will be determined in accordance with DEV4 as appropriate. 	
<p>Proposed Policy HOU7: Residential Internal Space Standards</p>	<p>The Council adopts the Government's nationally described space standard. All new dwellings (including changes of use and houses converted into flats) should provide adequate minimum internal space in line with the standard.</p> <p>All rooms which could potentially be used as a bedroom, including studies and home offices, will be required to meet, as a minimum, the space standard for a single bedroom.</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>
<p>Proposed Policy HOU8: Access Standards</p>	<p>The Council adopts the Optional Buildings Regulations for Accessible and Adaptable Homes.</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p>

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	<p>All dwellings are required to meet M4(2): Category 2 - Accessible and Adaptable Dwellings.</p> <p>Additionally, on sites of 20 or more dwellings, 5% of new market housing is required to meet the “wheelchair adaptable dwellings” standard in M4(3)(2)(a) (the provision made must be sufficient to allow simple adaptation of the dwelling to meet the needs of occupants who use wheelchairs).</p> <p>Where there is an identified need on the Housing Register, sites of 20 or more dwellings that provide affordable housing in line with Policy HOU2 are, as part of the affordable housing requirement, expected to provide a minimum of 5% of the total housing requirement to meet the “wheelchair accessible dwellings” standard in M4(3)(2)(b) (the provision made must be sufficient to meet the needs of occupants who use wheelchairs).</p> <p>Only in circumstances where it can be robustly demonstrated by the applicant that it is not practicable or financially viable to deliver the provisions above or where the requirements are clearly incompatible with conserving and enhancing historic character, will new development be exempt from any of these policy requirements. Where only certain elements of the standard(s) cannot practically or viably be achieved, the remainder of the requirements of the standard(s) will still be expected to be provided.</p>	<p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>
<p>Proposed Policy HOU9: Specialist Housing for Older People</p>	<p>Schemes comprising of specialist housing for older people will be supported on suitable sites in sustainable locations with good access to public transport and local facilities, subject to compliance with other Local Plan policies.</p> <p>Developments 100 or more dwellings will be required to include a proportion of specialist housing for older people within the site (at least 10% of the total number of dwellings).</p> <p>In exceptional circumstances where provision cannot be met within development boundaries, planning permission may be granted for schemes comprising of specialist housing for older people outside development boundaries in order to meet a local need for such housing in rural areas, where the site is well related to an existing settlement and its</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<p>services, including access to public transport, the proposal accords with policies in the Landscape Character chapter, safeguarding intrinsic and distinctive landscape character and amenities and paying particular regard to the conservation of the High Weald National Landscape and is supported by landscaping proposals appropriate to the local landscape character, and the proposal meets other normal local planning and highway authority criteria, in line with other Local Plan policies.</p> <p>Schemes providing extra-care housing or housing with care will usually be prioritised over retirement living, sheltered accommodation or age-restricted general market housing, unless it is demonstrated that the site is unsuitable for an extra-care or housing with care scheme, or that there is an identified need for the proposed accommodation type in that location.</p> <p>The provisions of Policy HOU2 (Affordable Housing) will apply to all schemes meeting the size thresholds set out in the policy, at the proportions set out in that policy. Affordable housing shall be provided either as on-site provision or where this is shown not to be practical, as an equivalent financial contribution for off-site provision.</p> <p>As well as the provision of higher access standards (as set out in Policy HOU8), regard should be had to the “walkability” to services and public transport in the siting of housing schemes for older people. Schemes will also be required to comply with the 10 key design criteria set out in the HAPPI principles and other recognised design standards and guidance relevant to older people’s housing</p>	
<p>Proposed Policy HOU10: Residential Care Homes for Older People</p>	<p>New residential care homes for older people will be supported, subject to compliance with other Plan policies, on suitable sites in sustainable locations, with good access to public transport and local facilities, including healthcare facilities.</p> <p>Proposals to alter or extend existing residential care homes will be supported, subject to other Local Plan policies, where the alterations or extensions will result in a better standard of care provision or are required to meet current relevant standards</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<p>Proposals involving the loss of existing residential care homes, including through change of use, will be resisted unless:</p> <ul style="list-style-type: none"> a. it is demonstrated that sufficient provision of the equivalent or better quality is available in the local area; or b. it is demonstrated that alternative provision of the equivalent or better quality will be provided in the local area and made available prior to the commencement or redevelopment of the proposed scheme; or c. the proposal is supported by evidence that demonstrates the accommodation no longer meets minimum standards required to provide acceptable care and it is not practicable or viable to improve the accommodation to minimum standards or adapt for alternative specialist accommodation. 	
<p>Proposed Policy HOU11: Travellers and Travelling Showpeople Criteria</p>	<p>Planning permission will be granted for Gypsy, Traveller and Travelling Showpeople sites, when all of the following criteria are met as relevant:</p> <ul style="list-style-type: none"> i) The site is not located in a designated site of importance for biodiversity or an area of Priority Habitat. ii) The site is not in an area at risk of flooding, unless a site-specific flood risk assessment has demonstrated that the development will be safe and will not increase flood risk elsewhere. iii) The proposal accords with policies in the Landscape Character chapter. Development should safeguard intrinsic and distinctive landscape character and scenic beauty, paying particular regard to the conservation of the High Weald National Landscape and undeveloped coastline, and be 	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

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	<p>supported by landscaping proposals appropriate to the local landscape character.</p> <p>iv) Other than for transit sites, the site is located within or close to an existing settlement and is accessible to local services by foot, by cycle or by public transport.</p> <p>v) The site can be safely accessed by vehicles towing caravans and provides adequate and safe provision for on-site parking, turning, and access for emergency vehicles.</p> <p>vi) The site is of a small scale (maximum ten pitches/ plots) and is not disproportionate in scale to the existing settlement.</p> <p>vii) Mixed use sites should not unreasonably harm the amenity of adjoining properties.</p> <p>viii) In the case of sites for Travelling Showpeople, the site must also be suitable for the storage of large items of mobile equipment.</p> <p>ix) In the case of transit sites, the site should be located close to or within easy access of the strategic road network.</p> <p>x) In the case of transit sites, the proposal must be accompanied by a management plan which demonstrates how the site will be appropriately managed in perpetuity to ensure the amenity of its occupants and the local community is protected.</p> <p>Where planning permission is granted, appropriate conditions or planning obligations will be imposed to ensure occupation of the site is restricted to those persons genuinely falling into the definitions of Gypsies, Travellers and Travelling Showpeople.</p>	

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
<p>Proposed Policy HOU12: Self-Build and Custom Housebuilding</p>	<p>The Council will support Self and Custom Housebuilding projects, including community-led projects, subject to compliance with other relevant Local Plan policies.</p> <p>On all housing developments of 20 or more dwellings, at least 5% of the total number of dwellings to be provided should be made available as serviced plots for self or custom housebuilders.</p> <p>Plots should be made available and marketed through relevant marketing agencies for a period of at least 12 months. If the plots are not sold within this time period, the dwellings may be released for conventional market housing in line with the terms set out in the relevant planning obligation.</p> <p>Where appropriate, the Council will seek to ensure that self/custom build homes are developed in accordance with an agreed robust design code.</p> <p>The requirements of this policy do not apply where the site or proposed development:</p> <ul style="list-style-type: none"> a. provides solely for Build to Rent homes; b. provides specialist accommodation for a group of people with specific needs (such as purpose-built accommodation for the elderly or students); c. is exclusively for affordable housing, a community-led development exception site or a rural exception site; and d. consists solely of the re-use or conversion of vacant buildings; or of flats. 	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>
<p>Proposed Policy HOU13: New</p>	<p>New dwellings in the countryside will be allowed, in accordance with other Local Plan policies, in very limited circumstances, including:</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
<p>Dwellings in the Countryside</p>	<p>i) dwellings to support farming and other land-based industries. Normally, accommodation will initially be provided on a temporary basis for a period of three years. Both temporary and permanent dwellings will be subject to appropriate occupancy conditions, and all applications should comply with the following criteria:</p> <ol style="list-style-type: none"> 1. Demonstrate a clearly established functional need, relating to a full-time worker primarily employed in the farming and other land-based businesses. 2. Demonstrate the functional need cannot be fulfilled by other existing accommodation in the area. 3. Demonstrate the unit and the agricultural activity concerned are financially sound and have a clear prospect of remaining so. 4. Dwellings are of appropriate size, siting and design. <p>ii) the conversion of traditional historic farm buildings or other heritage asset in accordance with Policy HER2 and paragraph 84 of the NPPF;</p> <p>iii) the one-to-one replacement of an existing dwelling of similar landscape impact;</p> <p>iv) as a 'rural exception site' to meet an identified local affordable housing need in accordance with Policy HOU5;</p> <p>v) as a site for specialist housing for older people, to meet an identified need in accordance with Policy HOU9; and</p> <p>vi) single or pairs of dwellings, either within a settlement without a development boundary or adjacent to an existing development boundary where the site is either a small gap in an otherwise built-up frontage or is</p>	<p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<p>adjacent to the edge of an otherwise built-up frontage and where the site accords with policies within the Live Well Locally chapter and is close to local services including public transport connections and accessible to them by wheeling, walking or cycling. In all cases the proposal must accord with policies in the Landscape Character and Heritage chapters, safeguarding intrinsic and distinctive landscape character and scenic beauty and paying particular regard to the conservation of the High Weald National Landscape and historic environment. To prevent the inappropriate extension of settlements, proposals adjacent to a site which has previously been developed under this provision will not usually be permitted.</p> <p>In order to provide for local rural housing need, all new dwellings in the countryside which are permitted under this policy, other than replacement dwellings under part (iii), shall be subject to a restriction, secured by a planning condition or obligation, which limits their occupation to that of a primary residence and prevents their future use as a second home or holiday accommodation. Proposals to change the use of existing lawful holiday accommodation in the countryside to a dwelling will be considered under Policies DEV4 and ECO5.</p>	
<p>Proposed Policy HOU14: External Residential Areas</p>	<p>An integrated approach to the provision, layout and treatment of external areas of dwellings should be taken in accordance with relevant Local Plan policies and with specific regard to the following:</p> <ul style="list-style-type: none"> i) Private External Space: Appropriate and proportionate levels of private usable external space will be expected. For dwellings, private rear garden spaces of at least 10 metres in length will normally be required, other than in exceptional circumstances where this cannot be achieved in an otherwise acceptable development but an appropriate and proportionate level of private amenity space is provided to the side or front of the dwelling, or where there are particular reasons why the future occupiers of the dwelling(s) will have a lesser requirement for amenity space. Flats and 	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<p>maisonettes must provide a minimum of 10sqm of external amenity space per dwelling including at least 3sqm for private use.</p> <p>ii) Car parking, cycle storage, and Electric Vehicle (EV) charging: Provision for car parking, EV charging, and safe, secure and covered cycle storage for all new dwellings, including flats should be made in accordance with Local Plan Policy LWL8, East Sussex County Council’s ‘Guidance for Parking at New Residential Development’ and ‘Guidance for Parking at Non Residential Development and the Building Regulations requirements for EV charging.</p> <p>iii) Other storage: Consideration should be given to the need for additional storage for other large personal items within the external area of new residential developments, for example: children’s buggies, mobility scooters and wheelchairs. Factors influencing the need for additional storage will include the size of the dwellings, density, location, and the likely needs of the end-users of the development. Any such storage should be safe, secure and covered and conveniently located for users, easily accessible from the dwelling.</p> <p>iv) Waste and Recycling: Sufficient bin storage and collection points must be provided on all new residential developments and changes of use. Their siting and design should be considered at the outset, be integral to the development, respect the visual amenities and streetscape character of the dwelling and area, and be fully accessible for collection.</p>	
<p>Proposed Policy HOU15: Extensions to Residential Gardens</p>	<p>Extensions to the gardens of existing dwellings in the countryside will not be permitted unless the extension:</p> <p>i) is modest in area and the change of use and associated domestic paraphernalia does not harm the rural character of the area; and</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<p>ii) is to a natural boundary or is a logical rounding off.</p>	<p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>
<p>Proposed Policy HOU16: Extensions, Alterations and Outbuildings</p>	<p>Extensions, alterations and outbuildings to existing dwellings will be permitted where:</p> <ul style="list-style-type: none"> i) they do not unreasonably harm the amenities of adjoining properties in terms of loss of light, massing or overlooking; ii) they respect and respond positively to the scale, form, proportions, materials, details and the overall design, character and appearance of the dwelling; iii) they do not detract from the character and appearance of the wider street-scene, settlement or countryside location, as appropriate, in terms of built density, form and scale; iv) they leave sufficient usable external private space for the occupiers of the dwelling in accordance with Policy HOU14; v) they fully respect and are consistent with the character and qualities of historic buildings and areas, where appropriate; vi) in the case of extensions and alterations, they are physically and visually subservient to the building, including its roof form, taking into account its original form and function and the cumulative impact of extensions; and vii) in the case of outbuildings, they respect and respond positively to the character, appearance and setting of the main dwelling within its plot and the wider street-scene or general locality, through their siting, scale and massing, design and appearance and materials. 	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
<p>Proposed Policy HOU17: Annexes</p>	<p>The creation of residential annexes will be considered in accordance with a sequential approach in the following order:</p> <ul style="list-style-type: none"> i) an extension to the dwelling; ii) the conversion of an existing outbuilding within the residential curtilage that is located in close proximity to the dwelling; and iii) a new building located within the residential curtilage in close proximity to the existing dwelling and with a demonstrable link to the main dwelling, such as shared vehicular access, communal parking and amenity spaces, where appropriate. <p>All proposals will be assessed against the criteria of Policy HOU16 to ensure that they are appropriate in terms of the existing dwelling, surrounding area and amenities of occupants of nearby properties.</p> <p>In all cases, the occupation of the annexe shall be managed by planning condition or exceptionally a planning obligation to ensure that the accommodation is tied to the main dwelling, cannot be used as a separate dwelling and cannot be sold separately.</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>
<p>Proposed Policy HOU18: Boundary Treatments and Means of Enclosure</p>	<p>When planning permission is required for new or altered boundary treatments or other means of enclosure, including fences, walls, gates and gate piers and hedges it will be supported where:</p> <ul style="list-style-type: none"> i) the proposal does not involve the loss of existing boundary structures of historic or architectural interest; or ii) the proposed boundary treatment, by virtue of design, height, and materials or species, is consistent with the character of the locality; 	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<ul style="list-style-type: none"> iii) in the rural areas, the proposal would not, by virtue of its siting or appearance, adversely impact on the undeveloped character of the countryside, nor, by virtue of its design and appearance, introduce a suburban or urban feature into the rural area; and iv) the proposal is considered acceptable in terms of highway safety. 	
<p>Proposed Policy HOU19: Access and Drives</p>	<p>Proposals for new drives and accesses will be supported where:</p> <ul style="list-style-type: none"> i) they are considered acceptable in terms of highway safety, including for pedestrians and cyclists; ii) by virtue of their location and design and materials (including any soft landscaping) they would maintain the character of the locality, particularly in the rural areas; iii) they involve the relocation of an existing access, if there are highway benefits of relocating the existing access, and the existing access will be stopped up; and iv) either, they are constructed of permeable materials, or appropriate drainage is included to manage surface water run-off in accordance with Policy ENV2. 	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>
<p>Economy</p>		
<p>Proposed Policy ECO1: Supporting New</p>	<p>Proposals for new employment development, will be considered in accordance with the following criteria and subject to other Local Plan policies:</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
<p>Employment Development</p>	<p>i) be of a scale and nature appropriate to the locality, and not have adverse impacts on any neighbouring residential amenity; and</p> <p>ii) ensure that traffic generation can be satisfactorily accommodated by the existing or planned local road network, ensuring access arrangements are acceptable to the scale and type of development. Developments that</p> <p>iii) would potentially generate a significant amount of movement must be suitably located and submit sufficient information to assess its likely transport impacts as well as how these impacts would be effectively mitigated and considered in a Transport Assessment.</p> <p><u>Employment Development Outside Development Boundaries</u></p> <p>Suitable employment opportunities in the countryside will be supported in limited circumstances, including through the sensitive, normally small-scale growth of existing business sites and premises, and by the conversion, for employment use, of farm buildings in accordance with Policy ECO8.</p>	<p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>
<p>Proposed Policy ECO2: Protecting Existing Employment Sites and Premises</p>	<p>The effective use of existing employment sites will be secured by:</p> <p>(A) Land and floorspace currently (or last) in employment use, must be retained in such use unless it is demonstrated that there is no reasonable prospect of its continued use for employment purposes, or it would cause serious harm to local amenities.</p> <p>Where the continued employment use of a site/premises is demonstrated not to be viable, complementary enabling development as part of an overall scheme to</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<p>make most effective use of the property for employment purposes can be proposed.</p> <p>The approach to demonstrating if there is a reasonable prospect of continued commercial use is set out in Policy DEV4.</p> <p>If a mixed use scheme is not viable, alternative uses will be considered in accordance with a sequential approach in the following order:</p> <ul style="list-style-type: none"> i) community uses; ii) 100% affordable housing (in accordance with Policy HOU3); and then iii) Housing (in accordance with Policies HOU1 and HOU2). <p>(B) The intensification, conversion, redevelopment and/or extension of existing sites and premises, as well as access and environmental improvements, will be permitted where they accord with Policy ECO1 as well as other policies of the Plan.</p>	
<p>Proposed Policy ECO3: Designated Town Centres</p>	<p><u>Town Centres Areas</u></p> <p>The following designated Town and District Centre Areas, as defined on the maps in Appendix 2, will be the focus for main town centre uses:</p> <ul style="list-style-type: none"> - Bexhill Town Centre - Rye Town Centre - Battle Town Centre 	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<p><u>District Centre Areas</u></p> <ul style="list-style-type: none"> - Sidley District Centre - Little Common District Centre <p>In these areas, new main town centre uses will be granted planning permission, subject to compatibility with other Local Plan policies. The loss of such uses will be resisted where such losses are not permitted through the General Permitted Development Order 2015.</p> <p><u>Primary Shopping Areas</u></p> <p>Primary Shopping Areas, as set out below and on the Policy Maps, will give priority to retail and associated services and seek to protect the predominant shopping role and character of the area by controlling the loss of such units where possible:</p> <ul style="list-style-type: none"> - Bexhill Primary Shopping Area - Rye Primary Shopping Area - Battle Primary Shopping Area <p>Planning permission will be granted for the introduction of new shops and the expansion or refurbishment of existing premises, subject to compatibility with other Plan policies.</p>	
<p>Proposed Policy ECO4: Retail & Leisure Impact Assessments</p>	<p>Retail & Leisure Impact Assessments are required:</p> <ul style="list-style-type: none"> - for new retail development of 280sqm or more, outside of designated 	<p>There are no LSEs of this proposed policy on Habitats Sites.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<ul style="list-style-type: none"> - Primary Shopping Areas; and, - for new leisure development of 280sqm or more, outside of designated Town Centres. 	<p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>
<p>Proposed Policy ECO5: Tourism Activities, Facilities and Accommodation</p>	<p>Proposals relating to tourism activities, facilities and accommodation will be encouraged where they accord with the following considerations, as appropriate:</p> <ul style="list-style-type: none"> i) it provides for the enhancement of existing attractions or accommodation to meet customer expectations; ii) it supports active use along the coast, consistent with environmental and amenity factors; iii) it develops markets for local produce, particularly that which supports land-based industries and cultural assets; and, iv) it increases the supply of quality services and self-catering accommodation. <p>The loss of tourism activities, attractions, and visitor accommodation, currently (or last) in such use, must, be retained unless it is demonstrated that there is no reasonable prospect of its continued use. The approach to demonstrating if there is no reasonable prospect of its continued use is set out in Policy DEV4.</p> <p>Appropriate controls are in place that restrict occupancy to that for holiday/leisure purposes, whilst not unduly restricting operators from extending their season (subject to visual impact and flood risk considerations, where applicable).</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
<p>Proposed Policy ECO6: Holiday Sites</p>	<p>All proposals for camping, caravan and purpose-built holiday accommodation must accord with all other appropriate policies in this Plan and:</p> <ul style="list-style-type: none"> i) safeguard intrinsic and distinctive landscape character and amenities, paying particular regard to the conservation of the High Weald National Landscape and undeveloped coastline, and be supported by landscaping proposals appropriate to the local landscape character; ii) not significantly detract from the needs of agriculture; iii) not unreasonably harm amenities of residents in nearby dwellings; and iv) not be in an area at risk of flooding, unless a site-specific flood risk assessment has demonstrated that the development will be safe and will not increase flood risk elsewhere. <p>Proposals for static caravan, chalet or lodge accommodation must also:</p> <ul style="list-style-type: none"> v) be of a modest scale for low-key, high-quality accommodation that requires only limited ancillary facilities; or vi) comprise a limited amount of accommodation to enhance an existing countryside recreational use and be wholly ancillary to that use; or vii) where within an existing site, either: <ul style="list-style-type: none"> a. result in significant improvement to the appearance and quality of accommodation of that site, or 	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<p>b. be a limited extension of that site to a natural boundary and make a significant improvement to the appearance and quality of accommodation.</p> <p>Touring caravan or tented camping proposals should be of a small scale appropriate to the area. Where the temporary use of land is permitted, any ancillary facilities necessary to serve the site will only be permitted on a similar temporary basis or, if of a permanent nature, where they are compatible with the local character of the area.</p> <p>For all proposals, in order to prevent the residential use of holiday accommodation, their use will be restricted to holiday/leisure purposes only and will be subject to occupancy conditions relevant to the site, in accordance with Policy ECO5.</p>	
<p>Proposed Policy ECO7: Agriculture Development and Forestry</p>	<p><u>For new buildings</u></p> <p>New agricultural buildings and other non-domestic buildings (also including the conversion, replacement and extension of existing sites and premises, reasonably necessary to support agriculture and forestry, that are not permitted development) will be supported, provided that:</p> <ul style="list-style-type: none"> i) new development serves a need that is directly related to the enterprise, and is of the minimum scale required to meet that need; ii) wherever possible, development should re-use or be on the footprint of an existing agricultural building, otherwise it should be related physically and functionally to existing buildings associated with the enterprise, unless it can be demonstrated that there are exceptional circumstances relating to the needs of agriculture or forestry that require a more isolated location; 	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<p>iii) when development is, exceptionally, acceptable in flood risk areas, consideration is paid to the layout and form of development to mitigate flood risk;</p> <p>iv) the design and materials of the development respond to its function and the local landscape character; and</p> <p>v) existing redundant buildings within the application site which have a negative impact on landscape character are removed where appropriate</p> <p><u>New Agricultural Tracks</u></p> <p>Development proposals for new or improved access tracks for agriculture or forestry will be permitted where:</p> <p>vi) the proposal is essential for the sustainable management of the land;</p> <p>vii) it has been demonstrated that it is not feasible to accommodate the proposed traffic using existing accesses;</p> <p>viii) must be the minimum possible scale necessary for its proposed use;</p> <p>ix) the layout and design conserves and where possible enhances local landscape character, which includes being in accordance with local geology and fitting within the pattern of existing contours and vegetation;</p> <p>x) new tracks should protect and enhance existing drainage patterns; and</p>	

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<p>xi) where practicable, the track is opened as a path for permissive public usage or as Public Right of Way, and should be accessible from the existing Public Rights of Way network.</p>	
<p>Proposed Policy ECO8: Agriculture Diversification</p>	<p>Schemes for the diversification of farms will be permitted where they:</p> <ul style="list-style-type: none"> i) are located within an active farm; ii) demonstrate how the scheme will support and add value to the farm. Where appropriate, permission for diversification schemes will be subject to a condition tying the enterprise to the farm; iii) are ancillary and subordinate in scale to the farm or land-based business; iv) do not cause severance or disruption to the agricultural holding; v) make use of redundant buildings before proposing new buildings. New buildings should be clustered within existing building groups; vi) are of an appropriate scale and will not adversely impact on the character of the landscape, as well as local amenity; vii) are accessible, and traffic generation can be satisfactorily accommodated by the existing or planned local road network, ensuring access arrangements are acceptable to the scale and type of development with no adverse effect on the road network; and, viii) ensure vehicular access avoids residential streets and country lanes or mitigates impacts on these. 	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<p><u>For holiday lets and sites</u></p> <p>Proposals for holiday sites will need to be assessed separately against Policy ECO6.</p> <p>Proposals for holiday lets will be supported where they are provided only through the conversion of a suitable redundant farm building. If the proposal involves the conversion of a traditional historic farm building, it will need to accord with Policy HER2: Reuse of traditional historic farm buildings. Proposals for holiday sites will need to be assessed separately against Policy ECO6.</p>	
<p>Proposed Policy ECO9: Local Employment & Skills</p>	<p>New developments of 10 or more dwellings and 1,000sqm of more of commercial floorspace, are required to produce and deliver a Local Employment and Skills Plan (LESP):</p> <p>These developments will be required to make the following financial contribution* to the Council for costs associated with the implementation and monitoring of the LESP, which includes coordinating local employment and skills training:</p> <ul style="list-style-type: none"> - £200 per dwelling - £1 for every sqm of commercial floorspace <p>*Contributions based on these sums are to be index linked, starting from the date that the Local Plan is adopted.</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>
<p>Proposed Policy EC10: Equestrian Developments</p>	<p>Proposals for equestrian developments must, individually and cumulatively, safeguard the intrinsic and locally distinctive character and amenities of the countryside, with particular regard to the conservation of the High Weald National Landscape.</p> <p>In addition, proposals should accord with the following criteria, as applicable:</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<p>i) the siting, scale and design, including materials and boundary treatment, of any new buildings or facilities should be appropriate to their rural setting;</p> <p>ii) proposals should not be sited in particularly prominent or isolated locations where new development would not be appropriate;</p> <p>iii) where proposals are sited on agricultural land, areas of poorer quality land should be preferred to higher quality land. Similarly, the siting of proposals should have regard to the hierarchy of international, national, and locally designated sites, by prioritising sites on land with the least environmental or amenity value;</p> <p>iv) commercial riding schools, livery stables and related facilities should be satisfactorily integrated with existing buildings;</p> <p>v) any associated floodlighting, earthworks, new access routes or ancillary structures, including storage facilities, manure bays, hard-standings, fencing and jumps, should not have an adverse impact on the surrounding countryside, biodiversity or local residential amenities, having regard to other relevant policies in the Plan; and</p> <p>vi) adequate provision should be made for the safety and comfort of horses in terms of the land for grazing and exercising, notably in the consideration of stabling proposals. Where possible, commercial riding schools, livery stables and other commercial facilities should have satisfactory access to the public bridleway network without the use of unsuitable roads and in all cases not adversely impact on road safety.</p> <p>In some circumstances, conditions (such as the removal of permitted development rights for fencing and external storage) may be applied where it is considered that there is the need to control potential adverse landscape impacts which can arise from the poor</p>	<p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<p>management of sites. Permission may also be subject to the removal of excessive or inappropriate fencing which has already taken place.</p>	
<p>Proposed Policy LAN1: Rural Environments and Landscape Character</p>	<p>The siting, layout and design of development should maintain and reinforce the natural and built landscape character of the area in which it will be located, based on a clear understanding of the distinctive local landscape characteristics.</p> <p>Priority must be given to the conservation and enhancement of the district's national designated and locally distinctive landscapes and landscape features, including but not limited to:</p> <ul style="list-style-type: none"> i) The High Weald National Landscape (which is also subject to Policy GTC9). ii) The Romney Marshes, comprising of the distinctive low-lying levels to the east of the district with particular regard to the landscape setting of Rye and Winchelsea. iii) The Pevensey Levels, comprising of the low-lying area of wetland meadows between Bexhill-on-Sea and Hailsham in Wealden District. iv) Nationally designated historic sites including listed Parks and Gardens, Scheduled Ancient Monuments and the Registered Historic Battlefield at Battle. v) The undeveloped coast. vi) Open landscape between clearly defined settlements, including the visual character of settlements, settlement edges and their rural fringes. 	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<ul style="list-style-type: none"> vii) Ancient Woodlands. viii) Tranquil and remote areas, including the dark night sky. ix) Other key landscape features across the district, including native hedgerows, copses, field patterns, historic field boundaries, ancient routeways, ditches and barrows, and ponds and water courses. 	
<p>Proposed Policy LAN2: Trees, Woodlands and Hedgerows</p>	<p>Development must, where appropriate, enhance and expand the district's tree, hedgerow and woodland resource.</p> <p>Development that would result in the unacceptable loss of, or damage to, or threaten the continued well-being of, locally valued and/or protected hedgerows, community orchards, veteran trees or woodland will not be permitted. The following criteria must be met:</p> <ul style="list-style-type: none"> i) A CAVAT assessment submitted with all applications impacting on individual or groups of trees in order to quantify the public amenity value. ii) No net loss of hedgerows, as they form a key component of local ecological networks and ecosystem services. iii) Where the loss of trees and/or hedgerows is considered acceptable, adequate replacement provision must utilise local and native species that are in sympathy with the character of the existing tree or hedge species in the locality and the site. iv) Tree surgery work requiring consent must be undertaken in accordance with arboricultural best practice. All tree work must be undertaken in accordance with British Standard 5837: 2012 Trees in Relation to Design, Demolition and Construction. 	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<p>v) Details of soft landscaping details, including tree, hedge and wood planting where appropriate, must be provided with planning applications. Landscaping schemes should take into account local landscape character, ecological interests (including green infrastructure networks) and should include the planting of indigenous species where appropriate.</p> <p>vi) Details of long-term maintenance and management plans must be provided to accompany soft landscaping proposals.</p>	
<p>Proposed Policy LAN3: Dark Skies</p>	<p>Development types with significant lighting requirements should be located on sites away from intrinsically dark rural skies, and away from wildlife sensitive areas such as ancient woodland.</p> <p>Large areas of glazing in new building designs, especially wrap-around glazing and floor to ceiling windows, are discouraged, especially in rural areas with intrinsically dark skies.</p> <p>Artificial lighting proposals must:</p> <p>i) Follow the Institute of Lighting Professionals (ILP) guidance on reducing obtrusive lighting and other relevant guidance to aid protecting dark skies, including ensuring that lighting designers use exterior light control environmental zone E1 to inform any proposed lighting in, or affecting the setting of, the High Weald National Landscape.</p> <p>ii) Seek to protect wildlife-rich sites and habitats such as ancient semi-natural woodland from external lighting, and where lighting is needed, require minimised and ecologically informed lighting schemes regarding location, direction, lux levels, colour temperature and light fitting design.</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<p>iii) Seek to reduce light pollution, including glare and sky glow, by ensuring that flood-lit facilities such as sports pitches and car parks are turned off when not in use through agreements and planning conditions.</p> <p>iv) Avoid new street lighting where possible and ensure any street lighting required for junctions on adopted roads is kept to the minimum necessary and adheres to best practice in term of location, illuminance and equipment design and light temperature, to avoid unnecessary skyglow and light spill.</p>	
Environmental Management		
<p>Proposed Policy ENV1: Coastal, Water and Flood Risk Management</p>	<p>The effective management of the coast and water, as well as the risks posed by flooding, will be achieved through:</p> <p>i) 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';</p> <p>ii) ensuring that new development does not adversely impact any Ordinary Watercourse, Main River or flood and sea defences, as defined through The Environmental Permitting (England and Wales) Regulations 2016 (as amended), including through the use of buffer zones to the edge of new developments, which is also controlled through byelaw margins by the Environment Agency and Internal Drainage Boards.</p> <p>The Council will seek opportunities, on a site-by-site basis, and on the advice of statutory consultees, such as in areas at risk of flooding now or in the future, to increase the buffer distances defined in The Environmental Permitting (England and Wales) Regulations 2016 (as amended) to 'make</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<p>space for water', allowing additional capacity to accommodate climate change;</p> <p>iii) if development is, exceptionally, accepted in flood risk areas, consideration is paid to its layout and form to minimise development at risk from flooding now and in the future;</p> <p>iv) contributions will be sought for improvements to infrastructure to mitigate against flood risk where it is deemed necessary; and</p> <p>v) private, non-mains foul drainage systems are not environmentally acceptable within publicly sewered areas. Planning applications must demonstrate that connection to the public sewer is feasible and any mitigating measures necessary to enable a connection must be identified and agreed between the applicant and the sewerage undertaker.</p> <p>If a non-mains drainage solution is proposed, an applicant must demonstrate that it is not practicable to connect to the public sewer. Sufficient information to understand the potential implications for the water environment of non-mains drainage must be submitted, including the Environment Agency's Foul drainage assessment form (FDA1). The hierarchy of non-mains alternative solutions must be followed:</p> <p>(a) package sewage treatment plants (which may be offered to the sewerage undertaker for adoption) where effluent goes through a wetland prior to discharge into the watercourse / ground as that will improve water quality; then</p> <p>(b) septic tanks; then</p> <p>(c) in the last instance, a cesspool if no other solution is possible.</p>	

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
<p>Proposed Policy ENV2: Sustainable Surface Water Drainage</p>	<p>For planning permission to be granted, applicants must demonstrate that sustainable drainage is an integral part of the proposed development and its design. In particular:</p> <ul style="list-style-type: none"> i) drainage should be designed and implemented having regard to the latest local, regional and national guidance. Applicants must also demonstrate that arrangements are in place for ongoing maintenance of Sustainable Drainage Schemes (SuDS) over the lifetime of the development; ii) peak run-off rates from development must be the lower of the two following options: either the greenfield rate in terms of volume and flow; or the existing rate/volume of discharge; iii) for all development, including outline applications, sufficient space must be given within a site to ensure that the SuDS can be accommodated within the layout of the site; iv) for phased development, a Drainage Strategy should be provided which takes a strategic approach to drainage provision across the entire site and incorporates adequate provision for SuDS within each phase; v) SuDS should be designed and implemented wherever possible to be 'multi-functional' and deliver other policy objectives where appropriate, such as: the provision of habitats and support for biodiversity; reinforcing local landscape character; enhancing the design of development; provision of open space/ recreation; promotion of water use efficiency and quality; reducing risks of land instability; and incorporation into any green and blue infrastructure plans; vi) at Fairlight Cove, drainage proposals should accord with Policy ENV3 (Land Stability) and Policy ENV4 (Fairlight Cove Coastal Change anagement Area); 	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<p>vii) new development should utilise opportunities to reduce the causes and impacts of all sources of flooding, ensuring flood risks are not increased elsewhere, that flood risks associated with the construction phase of the development are managed, and that surface water run-off is managed as close to its source as possible;</p> <p>viii) all developments should demonstrate all surface water will pass through at least two treatment stages. For development in the hydrological catchments of Pevensey Levels and the Dungeness Complex of Habitats Sites, a minimum of three stages of treatment will be required; and</p> <p>ix) any planning application, including in outline, that triggers a Habitats Regulation Assessment (HRA) will need to provide sufficient details of an appropriate surface water drainage scheme to satisfy the HRA.</p>	
<p>Proposed Policy ENV3: Land Stability</p>	<p>New development, including residential extensions and alterations, will only be permitted on unstable or potentially unstable land, including former landfill sites and coastal margins, where:</p> <p>i) the nature of the instability has been properly assessed through a full land instability risk assessment report; and</p> <p>ii) any remedial measures required to ensure that the development does not add to the instability of the site or surrounding land, are environmentally acceptable, and are normally implemented prior to the commencement of building works.</p> <p>The use of infiltration to manage surface water will not be allowed, unless a qualified geotechnical engineer has assessed the risk.</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
<p>Proposed Policy ENV4: Fairlight Cove Coastal Change Management Area</p>	<p>(A) The coastal zone at Fairlight Cove (as shown in both Figure 41 below and on the Local Plan Policies Map) is designated as the Fairlight Cove Coastal Change Management Area.</p> <p>Permanent new residential development (including through change of use) will not be acceptable in the Fairlight Coastal Change Management Area. Soakaway drains will not be permitted within the Fairlight Cove CCMA.</p> <p>Any other forms of development will only be considered acceptable if a coastal change vulnerability assessment, which is proportionate to the scale and type of development, demonstrates that:</p> <ul style="list-style-type: none"> i) the development is necessary in that specific location; ii) it will be safe over its planned lifetime iii) it will not have an unacceptable impact on coastal change, including the character of the coast (and any designations); iv) the development provides wider sustainability benefits; and v) the development does not hinder the creation and maintenance of the King Charles III English Coast Path, National Cycle Network, or any other public rights of way adjacent to or that benefit from views or access to the coast. <p>The Council may grant a time-limited permission to minimise the longer-term risks to a particular development.</p> <p>(B) Any proposals for the relocation of an existing development situated within the Coastal Change Management Area to outside of it must relate to a site at risk of loss within 20 years (the short term) of the application being made.</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<p>The new development must:</p> <ul style="list-style-type: none"> i) be located outside and inland of the Coastal Change Management Area, such that the coastal change risks associated with the proposed site are less than the existing site; ii) be of a similar scale and character to the existing development, whilst still having regard for the character of the new location; and iii) include plans to remove and clear any structures on the existing site to make it as safe as possible. iv) When relating to residential development, be in a location that is no less sustainable than the location it is currently situated in; or v) When relating to non-residential development, be in a location that is still accessible to the existing coastal community it currently serves. <p>Development must still accord with all other relevant policies within the Local Plan.</p>	
<p>Proposed Policy ENV5: Habitats and Species</p>	<p>Development proposals must follow the mitigation hierarchy and:</p> <ul style="list-style-type: none"> i) Conserve, enhance and provide the appropriate management for the biodiversity and ecological value of: <ul style="list-style-type: none"> a. international, national, regional and local designated sites of biodiversity and geological value; b. Irreplaceable habitats (as defined by the NPPF or as advised by Defra) as well as priority hedgerows; 	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<ul style="list-style-type: none"> c. Protected Species, and Priority Habitats and Species both within and outside designated sites; and d. Any other ecological feature or network (either green or blue in character) that is deemed appropriate to consider, including areas that could become of importance for biodiversity, as mapped in the Local Nature Recovery Strategy (LNRS). <p>Depending on the status of habitats and species concerned, this may require locating development on alternative sites that would cause no or minimal harm, incorporating measures for prevention, mitigation and (only in the last resort) compensation. This should be carried out under the Habitats Regulations Assessment where appropriate.</p> <ul style="list-style-type: none"> ii) Support opportunities for management, restoration, creation and enhancement of habitats in line with the opportunities identified for the Biodiversity Opportunity Areas (BOAs), and/or the Local Nature Recovery Strategy. <p>Include a scheme for the provision of integrated bird and bat boxes and bricks, bee bricks and hedgehog highways tailored to habitat conditions existing on or being created on and/or adjoining the site.</p> <ul style="list-style-type: none"> iii) Have regard to Natural England's Green Infrastructure Framework and associated standards and guidance. iv) Ensure any proposed flood protection measures have full regard to sensitive areas designated with specific nature conservation and biodiversity interests. v) For Ancient Woodland, create a development buffer zone of at least 15 metres. An impact assessment will be required where any development is 	

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<p>proposed within 25 metres of Ancient Woodland to demonstrate that the proposed buffer zone avoids negative effects on the habitat.</p> <p>vi) For ancient and veteran trees retain a buffer zone at least 15 times larger than the diameter of the tree, or five metres from the canopy edge, whichever is the largest. An impact assessment will be required where any development is proposed within 10 metres to demonstrate that the proposed buffer zone avoids negative effects on the habitat.</p>	
<p>Proposed Policy ENV6: Sustainable Access and Recreation Management Strategy</p>	<p>All development within the strategy area of the Dungeness Complex Sustainable Access and Recreation Management Strategy (SARMS) (as shown in Figure 43) should have regard to the measures identified in that Strategy.</p> <p>Proposals that have the potential to result in any increase in levels of recreational access within the SARMS strategy area will need to demonstrate measures to avoid impacts on the Dungeness Complex of Habitats Sites, and any such access should be focused on those areas with existing permitted walking and cycling routes, in order to protect undisturbed habitats. Appropriate measures either on or off-site will be secured as part of a planning permission either by condition or legal agreement.</p> <p>Development that is deemed in conflict with the Strategy will not be supported.</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>
<p>Proposed Policy ENV7: Environmental Pollution</p>	<p>Development will only be permitted where it is demonstrated that there will be no adverse impacts on health, local amenities, biodiversity or environmental character as a result of lighting, noise, airborne pollutants, water quality, land contamination, odour, hazardous and/or non-hazardous substances associated with development.</p> <p>This includes where appropriate, the cumulative impacts of existing and proposed developments. Developments should put good design first to minimise the need for mitigation measures.</p>	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<p>Regarding specific forms of pollution:</p> <ul style="list-style-type: none"> i) in relation to noise, consideration will also be given to the character of the location and established land uses. Also, in the case of new noise-sensitive development, the ‘agent of change’ principle applies to the new development and appropriate design and mitigation must be provided in the new development. In any instance, good acoustic design will be required (as set out within Professional Practice Guidance on Planning & Noise - New Residential Development) ii) in relation to new noise generating equipment, any such installation should have regard to the existing background noise levels of the area and not be louder than existing background noise levels. In some cases the Council may require equipment to be below background noise levels; and iii) in relation to lighting, the proposed scheme is necessary and the minimum required, and is designed to minimise light pollution including light glare and sky glow and to conserve energy, through the use of best available technology, having regard to the lighting levels recommended by the Institution of Lighting Professionals (ILP) for the relevant environmental zone. Development should also be in accordance, where relevant, with Policy LAN3 (Dark Skies). <p>Permitted development rights for any noise generating equipment may be removed via condition where it is felt reasonable and necessary to ensure the protection of the environment from any form pollution.</p> <p>A suitably qualified person must be used to carry out any assessments to demonstrate compliance with this policy.</p>	
<p>Heritage</p>		

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
<p>Proposed Policy HER1: Heritage Management</p>	<p>Development affecting the historic built environment, including designated and non-designated assets, must:</p> <ul style="list-style-type: none"> i) reinforce the special character of the district's historic settlements, including villages, towns and suburbs, through siting, scale, form and design; ii) take opportunities to improve areas of poor visual character or with poor townscape qualities; iii) preserve, and ensure clear legibility of, locally distinctive vernacular building forms and their settings, features, fabric and materials, including forms specific to historic building typologies; iv) follow best practice guidance from Historic England regarding alterations to improve energy efficiency, including having regard to a 'whole building approach' using Historic England methodology, to ensure that energy conservation measures or micro-generation installations do not damage the special character or significance of heritage assets or compromise their performance; v) refer to the character analysis in Conservation Area Appraisals, where relevant; vi) reflect current best practice guidance produced by English Heritage; and vii) ensure appropriate archaeological research and investigation of both above and below-ground archaeology, and retention where required. 	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
<p>Proposed Policy HER2: Traditional Historic Farm Buildings</p>	<p>Traditional historic farm buildings will be retained in effective and appropriate use, and proposals for their reuse and/or subsequent alteration should:</p> <ul style="list-style-type: none"> i) Take a hierarchical approach for re-uses as follows: <ul style="list-style-type: none"> a. The priority use for traditional farm buildings is to remain in farm-associated use, or farm-related business purposes. b. Where there is a demonstrable lack of need for such uses, consideration will be given to non-agricultural economic uses, including workshops and office use or tourism uses. c. Where such uses are not suitable, due to adverse impacts on amenity or rural landscape character, or not achievable due to viability, then residential use may be considered acceptable. ii) Demonstrate that they are based on a sound and thorough understanding of the significance of the building and its setting, including in terms of history, layout, use, local relevance, fabric and archaeology. iii) Ensure retention of the building's legibility, form (as an example of a specific building typology), historic fabric and setting, and, through design, maintain the agricultural character and the contribution the building and its surroundings make to the wider rural landscape and countryside character. iv) Ensure proper protection of existing wildlife and habitats. 	<p>There are no LSEs of this proposed policy on Habitats Sites.</p> <p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>
<p>Proposed Policy HER3: Shopfronts, Signage and Advertising</p>	<ul style="list-style-type: none"> i) Proposals for a new shopfront, an alteration to existing shopfront (including external blinds), or signage on buildings, will only be permitted where: 	<p>There are no LSEs of this proposed policy on Habitats Sites.</p>

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<ul style="list-style-type: none"> a. it relates appropriately, in size and design to the architectural and historic character and appearance of the building in which the shopfront is located; b. it relates appropriately, in size and design, to its overall setting in the street scene, and impact on public safety; and c. it has due regard to its proportions, size, design, visual relationship to upper storeys, materials, colour, height and width, and illumination. <p>Particularly within Conservation Areas, the loss of features or fabric of historic, architectural and/or socio-cultural merit or the installation of external roller shutters will not normally be acceptable.</p> <ul style="list-style-type: none"> ii) Signage and advertisements on or in the grounds of commercial properties will be permitted where their number, size, shape, materials, location and design (including any lighting and illumination) have an acceptable impact on highway safety and amenity, including on the scenic, architectural and historic character of the locality. <p>Other than in exceptional circumstances, free-standing signage and advertisements should have a close physical relationship to the premises that they serve.</p> <p>In rural areas, signage and advertisements should not detract from landscape character or the undeveloped nature of the countryside, including after dark, nor introduce unnecessary “clutter”.</p>	<p>The proposal is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.</p> <p>There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.</p>

Appendix C Figures

Figure 5 Pevensey Levels Hydrological Catchment Area

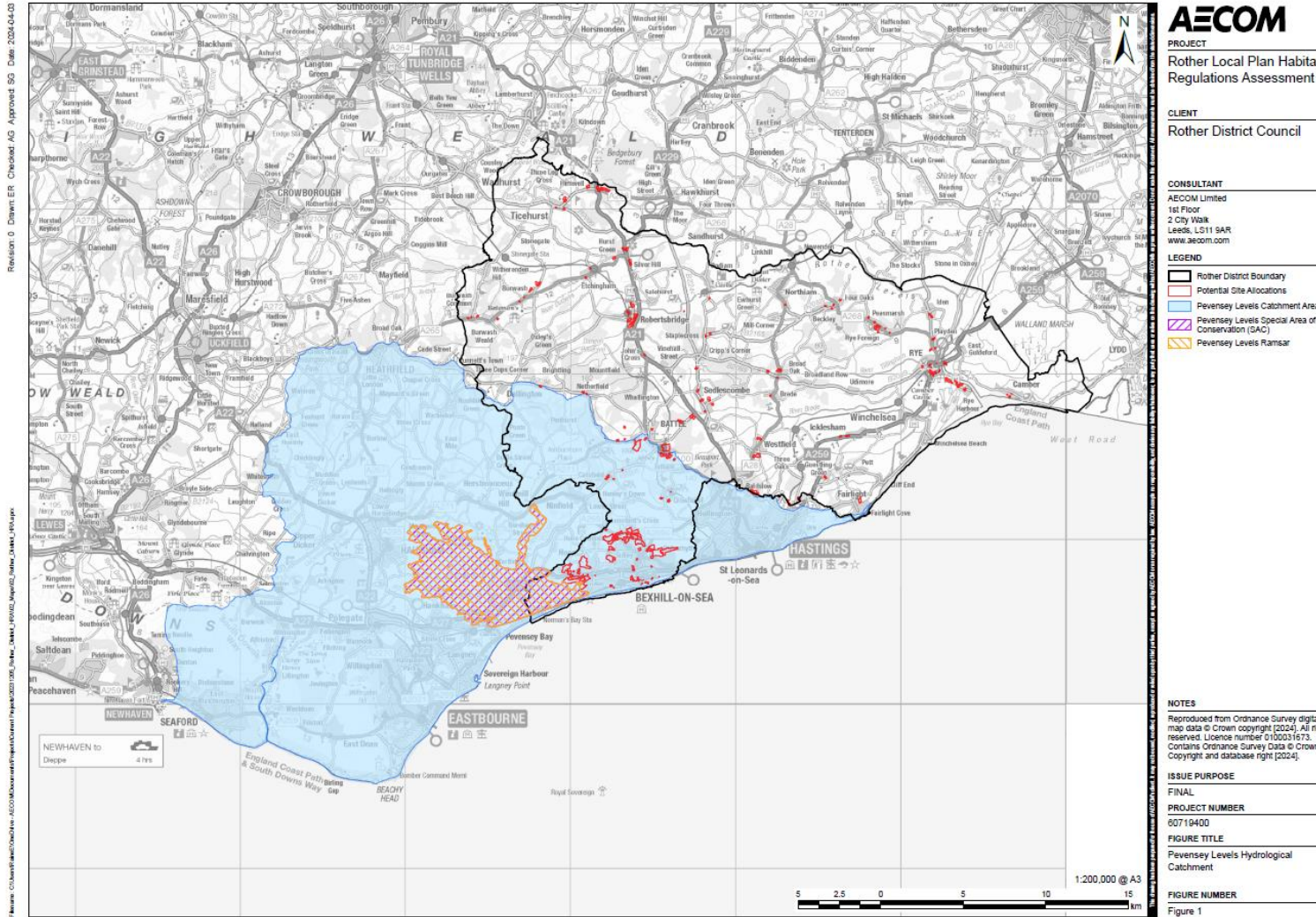


Figure 6 Recreational Pressure 10km Zone around Dungeness Complex

