



Draft Rother Local Plan 2025 - 2042

Sustainability Appraisal: Non-Technical Summary

Regulation 19 (Pre-submission) version

September 2026

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1. This is a **Non-Technical Summary** of the Sustainability Appraisal Report, which has been prepared in support of the new Rother Local Plan 2025-2042. The full report is provided in a separate document.

Background

2. Rother District Council (“the Council”) is preparing a new Local Plan. This document will set out a vision and a framework for the future development of Rother district. Once adopted, the Local Plan will become part of the statutory development plan and used for planning decisions, including planning applications.
3. The Council is legally required to carry out a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) during the preparation of the Local Plan.
4. The role of SA is to promote sustainable development as part of the plan-making process. It provides an opportunity to consider ways by which the plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. A key part of the SA process is considering options or ‘reasonable alternatives’ for the plan’s strategies and policy proposals.
5. SEA involves the assessment of plans and programmes for their likely environmental effects, looking closely at potential significant effects. SEA does not cover wider social and economic matters as SA does.

6. Government planning guidance advises that SA and SEA can be carried out as a single process. The Council is therefore following this approach. Where the term SA is used in this report, it refers to both SA and SEA.
7. This SA report also includes a Health Impact Assessment, to ensure health and wellbeing is fully considered with the SA.
8. A Habitats Regulation Assessment, for internationally and nationally protected habitats sites, has also been prepared but this is separate to the SA.

The SA Process

9. The SA involves several stages that are carried out during the preparation and implementation of the plan. The five key stages of the SA process are set out below.

Stage A: Setting the context/objectives, establishing the baseline and deciding on the scope.

Stage B: Developing and refining options and assessing effects.

Stage C: Preparing the Sustainability Appraisal Report.

Stage D: Consulting on the Local Plan and the SA Report.

Stage E: Monitoring the significant effects of implementing the Local Plan.

10. Stage A was carried out with the preparation and publication of the SA/SEA Scoping Report in January 2021.
11. A draft Scoping Report was first prepared by the Council, working jointly with Hastings Borough Council. The Councils then consulted the statutory

environmental bodies (Environment Agency, Historic England and Natural England) on this report. Selected Government bodies, neighbouring authorities and other key stakeholders were also consulted. Informed by consultation feedback, the final SA/SEA Scoping Report was prepared and published. This established the SA Framework for the preparation of the new Local Plan, which is discussed further below.

12. Stage B of the SA process started with the preparation and publication of the draft Rother Local Plan and the first Interim Sustainability Appraisal report. These documents were subject to a public consultation (known as the 'Regulation 18' stage), which was carried out from 30 April to 23 July 2024.
13. Stage B of the SA process continued with the preparation and publication of the draft Rother Local Plan – Development Strategy and Site Allocations document and a second Interim Sustainability Appraisal report. These documents were subject to a further public consultation (also a Regulation 18 consultation), 26 January to 23 March 2026.
14. Stage C involves the preparation of this final Sustainability Appraisal report for the next round of public consultation (the 'Regulation 19' stage), which is Stage D in the SA process. This is when the 'Proposed Submission' version of the Local Plan and supporting documents (including the final SA Report) are published before being submitted for examination by a Government appointed Planning Inspector. The final SA Report builds upon the Interim Sustainability Appraisal Reports.

Local Context and the SA Framework

About Rother district

15. The plan area for the new Rother Local Plan covers all of the administrative boundary for Rother district. Rother is a one of 5 lower tier local authorities in East Sussex, also including Eastbourne Borough Council, Hastings Borough Council, Lewes District Council, and Wealden District Council. East Sussex County Council is the upper tier authority. Rother covers roughly 200 square miles by area, with a coastline spanning some 25 miles.
16. The resident population of Rother is approximately 91,000, according to Census 2021 data, with roughly half of the population residing in Bexhill. There is an established settlement hierarchy, with the larger settlements of Bexhill, Battle and Rye, and a supporting network of smaller settlements and villages; however much of the district is rural in nature.
17. Although not a wealthy area relative to other more affluent parts of the South East, Rother is an attractive and safe place to live. However, despite the district having many positive attributes, it also faces issues including the availability of affordable housing, areas that experience deprivation (and some of the highest levels in the country), and the need to build a more diverse and resilient local economy.

Figure A: Context for the Rother Local Plan



18. Most of Rother district (83 per cent) is located within the High Weald National Landscape, a designated 'Area of Outstanding Natural Beauty'. In addition, roughly 7 per cent of the district includes internationally or nationally protected habitats sites.
19. Rother benefits from the presence of built and natural heritage assets. The historic environment is a highly valued and distinctive feature of the area, with statutory protection of over 2,000 listed buildings, 10 Conservation Areas, a number of Scheduled Ancient Monuments, as well as the 'Historic Battlefield' at Battle.
20. The partly low-lying and coastal nature of the district, along with its network of ridges and valleys, make it vulnerable to flooding. The predominant flood risk comes from the sea, rivers and watercourses, although the district also experiences surface water flooding. The majority of the coast benefits from flood defences.

Review of Plans, Policies and Programmes

21. The Local Plan does not sit alone. It must align with international, national, regional, and local legislation, policies, and strategies. As part of the SA process, it is important to identify and review relevant plans, policies, and programmes and explain their relationship with the Local Plan.

22. This policy review was first carried out in the SA/SEA Scoping Report (2021) and then updated in the Interim Sustainability Appraisal Report (2024), which should be referred to for further information. This SA report signposts some of the key plans, policies and programmes and provides updates to the policy context.
23. At the international level, the Strategic Environmental Assessment Directive and Habitats Directive are important as they require SEA and habitats assessments to be undertaken during the preparation of the Local Plan.
24. Nationally, there is legislation and policy that sets the overall framework for planning, environmental protection, and biodiversity - including the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF). Recent reforms introduced by the Levelling Up and Regeneration Act 2023, alongside updated policies on transport, waste, and traveller sites, must also be considered.
25. Regionally and locally, strategies such as the East Sussex Waste and Minerals Local Plan, Local Transport Plan 4 (2024–2050), Climate Emergency Plan, National Landscape Management Plan, and emerging Nature Recovery Strategy set out strategies to address climate change, sustainable transport and nature. Additionally, there are neighbouring authorities' Local Plans and adopted Neighbourhood Plans which set planning policies that affect the district.

Key sustainability issues

26. The following chart provides a summary of the key sustainability issues for Rother district. It also sets out risks that may occur without the Local Plan in place (and its guidelines to manage new development). This summary is based on

the review of plans, policies and programmes as well as information collected about the district.

Figure B – Key sustainability issues for Rother

	Air Quality - Increased traffic emissions from new development - Decarbonisation and transport emissions remain key challenges - Little or no improvement in air quality without intervention
	Biodiversity - Harm to habitats and designated sites - Limited Biodiversity Net Gain - Risk to ecological networks and protected landscapes
	Climate, Flooding & Coastal Change - Higher flood risk and coastal erosion - Development in vulnerable areas
	Population, Health & Wellbeing - Ageing population and health inequalities - Worsening deprivation and housing shortages - Pressure on services and community facilities
	Heritage Risk to heritage assets and their settings without careful management
	Land & Water Quality - Increased waste generation - Pressure on water networks - Potential decline in water quality
	Natural Landscape Poorly located or designed development could harm the High Weald National Landscape
	Skills, Employment & Economy Economic stagnation

SA Framework

27. The SA Framework is the tool that is used to assess the emerging Local Plan and its policies against environmental, economic and social sustainability objectives.
28. The SA Framework for the Local Plan was presented in the SA/SEA Scoping Report (2021). This set out 20 sustainability objectives for assessing the Local Plan. These objectives are listed in the table below and are organised by key topics/themes.

Figure C – Rother SA Framework Summary

SA Theme	SA objective
Air Quality	1. Reduce air pollution from transport and development and improve air quality.
Biodiversity	2. Biodiversity is protected, conserved and enhanced.
Energy and Water Consumption	3. The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation)
Energy / Water Consumption	4. Minimise water consumption.
Climate Change	5. Manage and reduce the risk of flooding (fluvial, tidal and surface water), now and in the future, and increase resilience to the wider effects of climate change.
	6. The risk of coastal erosion is managed and reduced, now and in the future.
Population, Health and Wellbeing	7. The health and well-being of the population is improved and inequalities in health are reduced.
	8. More opportunities are provided for everyone to live in a suitable home to meet their needs.
	9. All sectors of the community have improved accessibility to services, facilities, jobs, and social and cultural opportunities.
	10. Safe and secure environments are created and there is a reduction in crime and fear of crime.
Heritage	11. Historic environment/ townscape is protected, enhanced and made more accessible.
Land and Water Quality	12. The risk of pollution to land and soils is reduced and quality is improved.
	13. Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced.
	14. The risk of pollution to water is reduced and water quality is improved.
Natural Landscape	15. Ensure that Parks, gardens and countryside are protected, enhanced and made more accessible.

SA Theme	SA objective
Skills, Employment and Economic Development	16. Economic performance is improved.
	17. There are high and stable levels of employment and diverse employment opportunities for all.
	18. Levels of poverty and social exclusion are reduced, and the deprivation gap is closed in the more deprived areas.
	19. Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve.
Transport	20. Road congestion levels are reduced and there is less car dependency and greater travel choice.

29. The SA Framework includes a series of guiding questions to help with the assessment of the plan and policy proposals (as well as reasonable alternatives). This helps with considering the likely effects of the proposals, including:

- The nature or type of impacts;
- How these impacts may change over time; and
- The relative extent or scale of the impacts.

Assessment scoring

30. The Regulation 19 Local Plan policies (and reasonable alternatives) are being assessed against the 20 SA Objectives, as set out in the SA Framework.
31. A scoring key is used for the assessment, with a symbol and colour code marked for the likely effects of the Local Plan proposals – positive, neutral or negative. The results of the scores for all 20 SA Objectives are set out in tables. These are supplemented by supporting text.

32. As part of the assessment, plan proposals are considered by themselves as well as in combination with other plan, policies and programmes. In addition, their potential effects are considered over the short, medium and long-term.

Figure D – SA Scoring Key

Symbol	Explanation
++	Option has potential significant beneficial effect.
+	Option supports the objective, or elements of the objective on balance, although potential beneficial effects may be minor.
o	Option has no effect or is irrelevant; or Overall effect is neutral insofar as the benefits and drawbacks appear equal and neither is considered significant; or Uncertain or insufficient information on which to determine the assessment at this stage.
-	Option appears to conflict with the objective on balance and may result in potential minor adverse effects.
--	Option has potential significant adverse effects.

Limitations and difficulties encountered in preparing the SA

33. It is a requirement of the SEA Regulations that, when providing a description of how the assessment was undertaken, information is provided on any difficulties encountered in compiling the required information.
34. The main difficulties of undertaking the SA were:
- Ensuring the SA was an ‘objective’ exercise. There is inevitably some ‘subjectivity’ with the assessment of policy options, as the professional judgement of planning officers is used

in the SA process. To help address this, the SA Framework includes clear objectives and guiding questions, and the Council has prepared a bespoke ‘template’ for use in the SA of site allocations and reasonable alternative sites, using digital mapping for accuracy of information. The template is set out in Appendix 5 of the main SA report.

- Assessing proposed policy options independently, and on their own merits (i.e., in the absence of how they might function in combination with other policies). To address this, a ‘policy off’ approach is used for the SA in the first instance, so to consider policy options by themselves. It then considers policies together with other policies, and plans. This helps the SA to identify mitigation measures that can be included in the plan to help address potential negative or adverse impacts of policies.
- Maintaining an up-to-date baseline of information to consider impacts of policy proposals. This is because information about the district, its population and higher-level policies is constantly changing.

SA of the Development Strategy and Options

What is a Development Strategy?

35. One of the key parts of the Local Plan is the Development Strategy, also known as the Spatial Strategy. This sets out the overall approach to managing growth and new development in Rother over the plan period. It identifies the main locations where new housing, employment,

community facilities and other uses will be directed to and built.

36. The Development Strategy seeks to address the development needs of the district. This includes the Government’s housing target (or Local Housing Need figure) for Rother, which is set by national planning policy. The Government’s target for Rother is 895 new homes per year, compared to the target in the Council’s adopted plan of 335 new homes per year. The new Local Plan seeks to provide for a minimum of 475 new homes per year.

Preparing the Development Strategy

37. The Council has considered many options (reasonable alternatives) for the Development Strategy, from the early stages of the plan-making process.
38. At first, the Council set out 13 options for the Development Strategy.¹ These were based on the following considerations:
- The existing pattern of settlements across the district, as well as their size and importance;
 - The transport network and connectivity between settlements (especially for access to services and facilities);
 - The development potential outside the High Weald National Landscape;
 - Opportunities to create new settlements, or large extensions to existing settlements; and
 - Opportunities for new development on the edge of the district boundary

¹ The Council has prepared a Development Strategy Background Paper, which should be referred to for further information.

in areas close to other settlements outside of Rother.

39. The sustainability of these options was tested by using the SA Framework, as part of the Interim Sustainability Appraisal (2024). The Council then selected a 'preferred approach' for the Development Strategy. This was, in general, a combination of the highest scoring options. This was also tested using the SA Framework. The 'preferred approach;' for the Development Strategy was included in the draft Local Plan (2024) for public consultation.

Figure E – Initial Development Strategy Options

Option code	Description
01	Village clusters
02	Radial settlement network connected to Bexhill and Hastings
03A	Bexhill Greenfield Growth 1 – within the existing road network
03B	Bexhill Greenfield Growth 2 – with new multi modal transport corridor
04	Sustainable settlement growth
05	Hastings urban fringes growth
06	Brownfield development
07	New rural settlement(s)
08	Proportional growth across district (by population)
09	Proportional growth across district (by settlement form and function)
10	A21 corridor growth with a new sustainable transport corridor
11	Growth in settlements with train stations
12	Outside the National Landscape (AONB)

40. The initial 'preferred approach' combined these options: SDO1, SDO2, SDO3A, SDO4, SDO5, SDO6, SDO10, SDO11.
41. The Council received thousands of comments on the draft Local Plan (2024) consultation, with many comments on

the Development Strategy. These included suggestions for additional options which the Council had not, to that point, considered. Therefore, for the draft Local Plan (2026) it prepared additional options based on these comments, as set out below.

Figure F – Additional Development Strategy Options

Option code	Description
13	A21 corridor growth, focussed within and around existing larger settlements.
14	Development within the strategic gaps

42. These additional options were then tested using the SA Framework, as part of the focus of this Interim Sustainability Appraisal.
43. Additional option 13 scored positively overall. The SA concluded that it provides a positive strategy to focus growth within and around existing settlements with access to local services, and that impacts to landscapes can be minimised due to development within and around existing built-up area.
44. Additional option 14 scored negatively overall. The SA concluded that whilst the option helps to meet identified development needs, the strategy would likely have an adverse impact on natural landscapes and the environment, as well as undermine the separation of settlements.

The Revised Preferred Approach for the Development Strategy

45. Based on the SA of these additional options and consultation feedback, the Council revised the preferred approach for the Development Strategy. This was tested using the SA Framework.

46. The revised preferred approach combined the following options: SDO1, SDO2, SDO3A, SDO4, SDO5, SDO6, SDO11, SDO13, along with options for gypsy, traveller and travelling showpeople.
47. The revised 'preferred approach' was included in the draft Local Plan – Development Strategy and Site Allocations (2026) document, which was subject a further public consultation.

Development Strategy for the Regulation 19 Pre-Submission Local Plan

48. As with the first Regulation 18 consultation in 2024, there were a wide range of comments on the draft Rother Local Plan – Development Strategy and Site Allocations (2026). This included concerns about the amount of growth being planned for and the impact this might have on local character, (including the National Landscape), and whether there was enough infrastructure to support this growth. The Council considered these comments in preparing the final Development Strategy.
49. In addition, there was new information that needed to be considered. This included a revised housing target set by the Government (down slightly from 912 to 895 new homes per year). Also, some landowners and developers provided new information on sites that were available for development. The Council also prepared new studies which updated the picture of needs for different types of housing, employment land, space for retail and leisure.
50. Overall, the new evidence did not suggest a significant change in the overall picture of local needs from previous studies. Therefore, the Council did not consider it necessary to dramatically re-think the

overall approach to the Development Strategy, or to test other reasonable alternatives for it.

51. The Development Strategy in the Regulation 19 Local Plan is similar to that which was presented in 2024. However, it has been fine tuned. For example, to take account of an updated Transport Assessment and Infrastructure Delivery Plan, as well as landscape sensitivity testing for the High Weald National Landscape.
52. The Council's reason for selecting this combined option as the preferred approach for the Development Strategy is that it provides a sustainable option overall, and will significantly boost housing supply, whilst ensuring protection of the National Landscape and habitats sites, in line with the statutory requirements. Furthermore, the approach is one that is considered to be deliverable based on land that is suitable and available for development; and can be appropriately supported by infrastructure.
53. The SA concludes that the Development Strategy is positive overall, particularly for objectives around housing and employment. This scoring however recognises that that the Government's housing target will not be met but still provides for a significant increase in housing supply.
54. There are a number of neutral scores on the SA objectives, as well as a negative score in association with emissions. This reflects the tension between increasing development in the district, whilst seeking to protect the environment, such as the National Landscape and countryside, and addressing climate change. The SA includes suggested mitigation measures in response to this.

SA of the Development Density Options

55. It is important to consider not only the distribution or location of new housing within the district (as with the Development Strategy) but also the appropriate density of housing in different locations.
56. The Government advises that planning policies should avoid homes being built at low densities and ensure that developments make the optimal use of land – which often means maximising the amount of housing that can reasonably be developed on a site.
57. The Council has therefore considered various density options for development in different locations of the district. These have been tested through the SA to help inform the preparation of the Local Plan and a ‘preferred approach’ for it.

The Housing Density Options

58. The Council has prepared a Density Background Paper which sets out information on how the housing density options were prepared. This should be referred to for further information, but a summary is provided below.
59. For the 2024 Local Plan, there were 3 density options considered for comparison purposes and scoring in the SA. The first option is based on the existing Local Plan² and also examples of recent developments built in the district, also known as the ‘baseline’. The other options are density levels that are higher than the baseline. The density options are set out as dwellings per hectare (dph) – or the number of homes that could be built

on one hectare of land; a higher dph means that higher densities can be achieved on the same area of land, in principle, and therefore a higher number of homes.

Figure G – Housing Density Options

Density option	Description
Business as usual	Current density standard (based on existing Local Plan and recent planning approvals), and the ‘baseline’ for comparison.
Higher density	Higher density with a moderate uplift in development density (compared to the baseline).
Higher density plus	Higher density with a significant uplift in development density (compared to the baseline)

60. For each of these main density options, the Council provided density figures within the district, for the following locations or area types:
 - Urban areas;
 - Suburban areas;
 - Live Well Locally areas³; and
 - Village areas.
61. The density options were then scored using the SA Framework.

Scenario Testing the Housing Density Options

62. There are a number of proposed development sites in the Local Plan, where the building of new homes, business space and other uses (such as community facilities) will be supported in order to meet local needs. These are also known as site allocations. The sites have

² Core Strategy Local Plan and Development and Site Allocations Local Plan respectively.

³ These were defined by the draft Rother Local Plan (2024).

been identified through a site selection process, and then tested through the SA, as discussed later in this section.

63. To ‘scenario test’ the density options, the different levels of density (as set out in Figure G) were calculated for the site allocations, based on the area of each site. This provided an estimate of the number of homes that could potentially be delivered across the district on the site allocations combined.
64. The results of the density scenario test is set out in the table below.

Figure H – Housing Density Scenario Testing

Density option	Density scenario test (number of potential new homes)
Business as usual	6,716
Higher density	9,225
Higher density plus	10,982

The Development Density Preferred Approach

65. For the 2026 Regulation 18 draft Local Plan, a ‘preferred approach’ for the density standard was selected based on this scenario testing exercise and other evidence. The Council proposed to use the higher density standard (Option B) for the draft Local Plan.
66. The SA concluded that the business-as-usual approach (Option A) would be likely to have less environmental impacts than the higher density options. However, it did not provide for significant positive scores on housing objectives. This was a very important finding for the Council, given the strong Government direction for boosting housebuilding and meeting local housing needs.

67. The higher density options scored significant positive effects for the SA housing objectives. Whilst they are likely to have greater environmental impacts on the SA objectives, there are opportunities to mitigate or lessen these impacts through additional planning policies. Option C (higher density plus) is not preferred as the Council considers that the impacts on SA objectives overall would be too great, and it would still fall short of enabling the Council to meet its Government housing target in full.

68. Some of the suggested mitigation measures to mitigate the identified negative impacts include:

- Carefully locating new higher density development within a local area, particularly where there is good access to local services;
- Additional policies to ensure that landscape character, particularly for the High Weald National Landscape, is protected; and
- Supporting policies to ensure higher density development does not harm local character (such as historic buildings) and amenity (such as overshadowing).

Density Approach for the Regulation 19 Pre-Submission Local Plan

69. In response to Regulation 18 consultation feedback, new evidence and as part of the overall refinement of the Local Plan, the Council sought to better recognise and reflect the distinctive, historic character and attributes of the historic towns compared to the Bexhill urban area, in terms of the density approaches.
70. Therefore, a more nuanced approach to character areas of the historic towns of Battle and Rye was created. This sought

greater flexibility for the range of appropriate densities within them. This revised preferred approach is set out in the revised Policy LWL1 of the Regulation 19 Local Plan, and the figure below.

Figure 1 – Density Approach, Pre-Submission Local Plan

Area Type	Density range
Bexhill Urban Area	110 – 130 dph
Bexhill Suburban Areas	45–75 dph
Historic Towns (Battle & Rye)	35-80 dph
Live Well Locally Areas	35–55 dph
Village Areas (with development boundaries)	25–45 dph
Countryside (including villages and hamlets without development boundaries)	None assigned – in response to local context

71. The Council did not consider that the revised approach for the two historic towns greatly affected the overall density assumptions or scenario testing exercise in 2024. Also, the overall package of site allocations did not change significantly from the Regulation 18 to the Regulation 19 stage. Therefore, it was content that the revised approach was proportionate and valid, and the SA Scoring.
72. The SA Scoring for the density approach in the Regulation 19 plan was positive for housing and economic development, as well as for accessibility to local services. There were number of neutral scores, and some negative, including air pollution, associated with the concentration of development in localities. Mitigation measures suggested by the SA were incorporated into the plan policies.

SA of the Thematic Topic-Area Policies and Options

73. The Local Plan also includes many thematic topic-area policies. These are often referred to as ‘development management’ style policies, as they are commonly used to determine planning applications. These policies help to support the delivery of the Development Strategy. National planning policy directs the Council to include such policies in the Local Plan. For the Rother Local Plan, these policies are organised by the following themes:
- Delivering new homes
 - A thriving local economy
 - Live well locally
 - Natural and historic environment

Preparing the Topic Area Policies

74. The 2024 draft Local Plan included a wide range of options (or reasonable alternatives) for the policies under these topic areas. It also identified preferred policy approaches. The selection of these preferred policies was informed by the SA of the options, and other evidence.
75. A description of the options and a summary of the SA scoring for each is included in the main Regulation 19 SA report.
76. The 2026 draft Local Plan did not cover these thematic policy topic areas to same extent as the 2024 draft plan. This is because the 2024 plan focussed mainly on the Development Strategy and site allocation policies (discussed below). The main area it did explore further was development density, particularly for new housing.

77. The Council prepared many new and updated studies between the first draft Local Plan in 2024 and the Regulation 19 Local Plan in 2026. In addition, new planning legislation, policies, guidance has been introduced by Government. This has, in some cases, affected the thinking behind some of the policies in the plan. This is discussed at length in the main report.

SA of the Thematic Topic Area Policies in the Regulation 19 Pre-submission Local Plan

78. Overall, the thematic topic area policies (and chapters) score positive or neutral for most objectives of the SA Framework, although there are negative scores in some instances. Throughout the SA process, suggested 'mitigation measures' to help improve the scores, or reduce the negative effects have been set out. These have been used to help refine the policies in the final plan as part of the ongoing SA process.

SA of the Site Allocation Policies and Options

SA of the draft HELAA sites

79. To inform the preparation of the Local Plan, the Council has produced a Housing and Economic Land Availability Assessment. (HELAA). The purpose of the HELAA is to provide an assessment of the potential supply of that is 'suitable, available and achievable' for housing and economic development over the plan period. This is mainly specific sites.
80. The HELAA is the starting point for considering development sites that may be appropriate to bring forward in the Local Plan as 'site allocation' policies – the HELAA effectively provides the initial broad range of site options (or alternatives) to be considered during the preparation of the plan.
81. A draft HELAA (2024) was published to support the first Regulation 18 consultation on the draft Rother Local Plan (2024). This study assessed over 900 sites for their suitability for future development.
82. The draft Local Plan, at that time, did not include proposed site allocation policies. However, it did provide information on findings of the draft HELAA (2024). Furthermore, the draft HELAA was published during the first Regulation 18 stage consultation, with the public invited to comment on it.
83. The Interim Sustainability Appraisal (2024) provided an assessment of the draft HELAA sites. Findings of the SA were used to inform the preparation of the draft Local Plan – Development Strategy and Site Allocations (2026) document. The Interim Sustainability Appraisal should be referred to for further information for scoring of sites at that time.

SA of the Proposed Site Allocations

84. A revised draft HELAA (2026) was prepared, based on the latest available information. It was published to support the second Regulation 18 consultation on the draft Rother Local Plan – Development Strategy and Site Allocations.
85. Individual site allocations were scored by the SA, using the SA Framework. A unique 'SA Template' was created to score sites against the Sustainability Objectives. This template differs slightly from the scoring for other types of Local Plan policies (and also the scoring of HELAA sites in the first Interim Sustainability Appraisal).

86. The reason for creating the template is to provide a more ‘objective’ basis for assessing sites, and to try and reduce ‘subjective’ judgements. It has been supported by the use of Geographic Information System (GIS) mapping (digital mapping). For example, to take account of development constraints or barriers (such as protected nature sites and flood risk areas), as well as to accurately measure distances to places or points of interest (such as distances from proposed development sites to parks and open spaces).

87. All sites that have been assessed by the revised draft HELAA (2026) as ‘suitable, available and achievable’ were included as proposed site allocations in the draft Rother Local Plan (2026) – they were the preferred approaches for sites, at that time. However, not all of the sites were assessed individually using the template. This is because some sites have already gained planning consent and therefore can be developed even without the new Local Plan – they have been assessed as being sustainable through the planning application and approval process.

88. Notably, some sites were assessed although but not included as proposed site allocations in the draft Local Plan. These were the ‘reasonable alternative’ sites, that were judged through the HELAA to be available (as landowners have confirmed this) but excluded by the Council on the grounds that they are not appropriate in planning terms.

89. Scoring tables for all of the proposed site allocations assessed by the template were set out in the Interim Sustainability Appraisal. The full SA report should be referred to for details of these. The scoring tables are set out by the five main sub-areas of the district, as set out in the draft Local Plan. Scoring tables for the

reasonable alternative sites (excluded sites) are included in an Appendix to the full SA Report.

Figure I – Sites Assessed using Template

Site type	Details	Assessed using template
Identified (committed) sites	Sites with planning permission	No
	Sites with a current application with a resolution to grant, subject to a legal agreement	No
	Extant (currently adopted) site allocations	Yes
Potential additional sites	Sites identified by HELAA as suitable, available, and achievable (not allocated or consented)	Yes
Rejected submitted sites	Sites submitted via ‘Call for Sites’ but rejected by HELAA as they are not suitable and/or achievable.	Yes

90. Overall, the sites proposed to be taken forward for site allocations scored positively on the SA Objectives. However, scores on the 20 criteria for individual sites varied due to their location and its local circumstances.

91. The SA includes suggested mitigation measures for the proposed site allocations. These mitigations were set out for sites within sub-areas because they shared similar characteristics. The mitigation measures help to address negative impacts identified by the SA, and to improve the overall sustainability. The mitigations have been considered by the

Council when preparing the site allocation policies for the Local Plan (including development requirements and design guidelines).

SA of the Proposed Site Allocations for Gypsy, Traveller and Travelling Showpeople Accommodation

92. The National Planning Policy for Traveller Sites (2024) makes clear that the Council must plan positively for the need of the gypsy, traveller and travelling showpeople community.
93. The Council has worked with the other East Sussex authorities to commission a joint Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (GTAA) (2022). This study provides a summary of permanent and transit accommodation needs for gypsies, travellers and travelling showpeople across the county, and also across each district and borough, over the period 2021 to 2040. An update to the East Sussex GTAA is in progress and will be completed in 2026, to give an up-to-date picture of need to the end of the plan period.
94. Sites for gypsy, traveller and travelling showpeople accommodation were assessed using the same SA template for other HELAA sites.
95. The main sustainability issues identified by the SA relate to access essential services and public transport, due to the fact that gypsy and traveller sites are often located outside of existing settlements. There are also some issues in relation to priority habitat within sites, and ancient woodland being adjacent to them. Furthermore, the site allocations are generally located in the High Weald National Landscape.
96. As with the other site allocations, the SA for gypsy, traveller and travelling showpeople accommodation includes suggested mitigation measures, and these have been considered by the Council when preparing the site allocation policies.

SA of the Site Allocations in the Regulation 19 Pre-submission Local Plan

97. The SA of the Regulation 19 Local Plan has been carried out in the same way as for the draft Local Plan (2026). Overall, the collection of sites has remained the same, although some sites have been removed and other included, due to new evidence. The HELAA has been updated to include the 'final' selection of sites that are considered to be suitable, available and achievable for new development within the plan period.
98. Overall, the scoring for sites and suggested are similar to the Interim SA Report (2026), given that the majority of sites have remained in the plan.
99. The SA of the 'reasonable alternative' sites (i.e., the sites submitted but ultimately excluded from the Local Plan) has also been reviewed and updated. Further details are contained in Appendix 6 of the full SA Report.

SA of the Area-based Policies

100. The draft Local Plan (2026) included 9 'area-based' policies which are specific to the Local Plan sub-areas. There are 4 of these policies which are proposed to be 'saved' and/or updated from the extant (existing) Local Plan and have therefore previously been subject to SA. However, in the interests of completeness, all of the proposed area-based policies have been subject to SA using the latest SA Framework. Overall, the policies have

scored positively against the SA objectives.

101. For the Regulation 19 Local Plan, the area-based policies largely remained the same. However, the policy dealing with Bewl Water was moved to the Chapter 7 on Environmental Management. And a further area-based policy dealing with Employment Land at Harbour Road, Rye was included. As such, the Regulation SA of these policies was similar to the Interim SA (2026).

SA of the 'Whole' Regulation 19 Pre-Submission Local Plan (including cumulative effects)

102. The SEA Regulations require that consideration is given to the 'cumulative effects' of implementing a plan or programme, and this is undertaken as part of the Sustainability Appraisal process. The cumulative effects consider the Local Plan together with other relevant plans, policies and programmes (rather than just the Local Plan policies individually).
103. To assess the cumulative effects, the Council has considered:
- All of the Local Plan policies together; and
 - Key plans and strategies from higher levels of Government, and particularly the adopted plans and strategies from East Sussex County Council;
 - Adopted Local Plans from neighbouring local authorities;
 - The 'made' (adopted) Neighbourhood Plans in the district.

104. The overall SA scoring of the Regulation 19 Local Plan, considering cumulative effects, is summarised in Figure J below.

Figure I – SA of the 'Whole' Local Plan

SA Objective	Score
1. Air pollution	-
2. Biodiversity	+
3. Climate change	-
4. Water consumption	-
5. Flooding	O
6. Coastal erosion	+
7. Health and wellbeing	+
8. Housing	++
9. Accessibility to services	++
10. Safe environments	+
11. Historic environment	O
12. Pollution	O
13. Waste and recycling	-
14. Water pollution	O
15. Natural landscape	-
16. Economic performance	++
17. Employment levels	++
18. Deprivation	+
19. Skills and education	++
20. Transport	O

Key findings

105. Overall, the Regulation 19 Local Plan includes a mix of positive, neutral and minor negative effects.
106. There are major (i.e. significant) positive effects for the SA objectives on housing, accessibility to services, economic performance, employment levels, and skills and education. Importantly, there are no significant negative effects assessed.
107. The major positive effects are owing to the Local Plan provisions for new housing and employment development to meet local needs. As well, the strategy scores positive by supporting the reinforcement of the settlement hierarchy, and broadly directing new development within and around accessible and sustainable locations.
108. There are minor positive effects for provisions in the Local Plan around biodiversity, development design (particularly for safe and accessible environments) and coastal management. Also, the Local Plan policies together are likely to have positive effects overall on the health and wellbeing of the local population, including by addressing deprivation.
109. The Local Plan includes a raft of new provisions to tackle the climate emergency, and individually these score positively – such as zero carbon development and promoting active transport to support transport modal shift away from private car use. However, when the plan is considered in combination with other strategies, plans and investment programmes, there are minor negative effects on some areas predicted.
110. This is owing to the impact of new development planned in the district over

the plan period. There is need for significant new investment, such as public transport and highways infrastructure, particularly with support from central Government. It is also noted that carbon emissions in Rother have fallen in recent years; but this is owing mainly to the decarbonisation of the electricity grid, and not necessarily through planning policy. In addition, a significant amount of carbon emissions arise from the existing, older housing stock, which the plan has less influence over compared to new development (where the plan includes policies for zero carbon development). But it must be reiterated that there are not significant effects predicted in this regard.

111. Chapter 7 of the full SA Report sets out detailed explanations of the reasons for the overall scores for each of the 20 SA objectives.

SA monitoring arrangements

112. The SEA Regulations require the Council, through the SA, to set out arrangements for monitoring any significant environmental effects of implementing the Local Plan. Monitoring helps to identify whether any predicted (or unpredicted) impacts arise over the plan period, so that measures can be taken to avoid or lessen them. An SA monitoring framework is included in Chapter 7 of the SA Report.
113. The Council currently monitors the implementation of its existing Local Plan through the Authority Monitoring Report (AMR). It is encouraged to incorporate the SA measures into this process.

Next Steps

114. This SA Report will be published alongside the Regulation 19 Pre-submission Rother Local Plan for public consultation. As set out before, this is 'Stage 4' of the SA process. After which, the Local Plan and supporting documents (including this SA Report) will be subject to an Examination in Public by a Government Appointed Planning Inspector.
115. Subject to the Local Plan being found sound and legally compliant at examination, the Council can formally adopt the Local Plan. In the situation the plan is formally adopted, the significant effects of implementing the plan will be monitoring, as per 'Stage 5' of the SA process.