

Rother District Council Local Plan Habitats Regulations Assessment

Regulation 19 Habitats Regulations Assessment

Rother District Council

September 2026

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 Regulation 19 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 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 Draft (Regulation 19) RLP is 2025 to 2042; 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.

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

- 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 [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 4. 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 Chapter 3.
- 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);

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

- 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>);
- 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 The flow chart below (Figure 2) is taken from Planning Inspectorate guidance, updated July 2026. While it was developed for projects it applies equally to plans..

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>

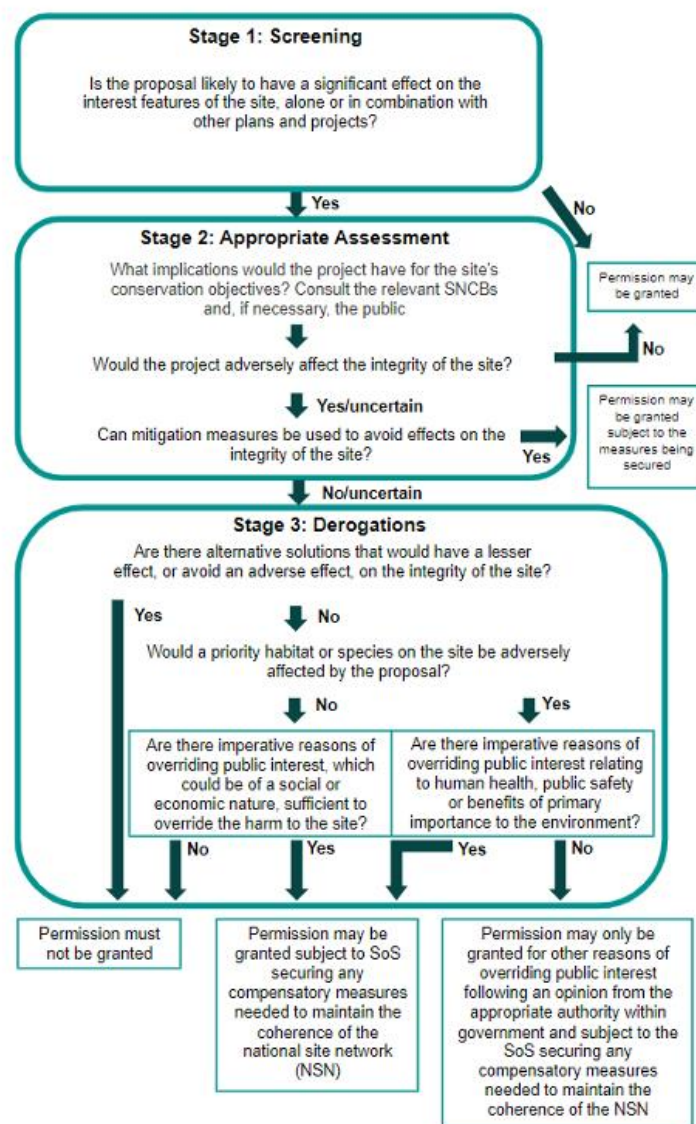


Figure 2: Four Stage Approach to Habitats Regulations Assessment of Projects and Plans (source: Nationally Significant Infrastructure Projects: Advice on Habitats Regulations Assessments - GOV.UK).

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.

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 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:

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

⁹ Case C-461/17

- 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 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 Regulation 18 Local Plan 2021-2041¹¹

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 Available at: https://www.hastings.gov.uk/content/planning-policy/HBC_Local_Plan_Re_18_PREFERRED_Options.pdf
 [Accessed 19/08/26]

- 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 2024-39 Adopted March 2025¹⁵
- Wealden Draft Local Plan (Focused Regulation 18) February 2026¹⁶, Regulation 19 consultation commenced September 2026¹⁷
- Ashford Local Plan Adopted February 2019 ¹⁸
- Tunbridge Wells Borough Local Plan 2020 – 2038 Adopted December 2025¹⁹
- South Downs Local Plan 2014-2033²⁰; new Local Plan at Regulation 19

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.

¹² Available at: <https://www.eastsussex.gov.uk/planning/waste-minerals-plans-monitoring-reports> [Accessed 19/08/26]

¹³ Available at: <https://eastsussex.objective.co.uk/file/6244231> [Accessed 19/08/26]

¹⁴ Available at: <https://www.folkestone-hythe.gov.uk/core-strategy-review> [Accessed 19/08/26]

¹⁵ Available at: [Draft 'Focused' Local Plan \(Regulation 18\) | Let's Talk Wealden](#) [Accessed 19/08/26]

¹⁶ Available at <https://www.wealden.gov.uk/planning-and-building-control/planning-policy/new-local-plan/> [Accessed 19/08/26]

¹⁷ Available at: [Regulation 19 Local Plan Consultation Information - Wealden District Council](#) [Accessed 30/09/26]

¹⁸ Available at [adopted-ashford-local-plan-2030.pdf](#) [Accessed 19/08/26]

¹⁹ <https://tunbridgewells.gov.uk/planning/planning-policy/local-plan> [Accessed 19/08/26]

²⁰ Available at <https://www.southdowns.gov.uk/planning-policy/south-downs-local-plan/local-plan/> [Accessed 19/08/26]

3. Habitats Sites

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;

²¹ Available at: <https://publications.naturalengland.org.uk/file/6711339502534656> [Accessed on 19/08/2026]

²² Available at: <https://publications.naturalengland.org.uk/file/6711339502534656> [Accessed on 19/08/2026]

²³ Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0030080.pdf> [Accessed on 19/08/2026]

- 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
 - 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:
- 3.11 Breeding species:
- A224 European nightjar (*Caprimulgus europaeus*)
 - A302 Dartford warbler (*Sylvia undata*)

²⁴ Available at: <https://publications.naturalengland.org.uk/file/6679502935556096> [Accessed on 19/08/2026]

²⁵ Available at: <https://publications.naturalengland.org.uk/file/6357909449474048> [Accessed on 19/08/2026]

Conservation Objectives^{26 27}

- 3.12 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;
- 3.13 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
 - The population of each of the qualifying features, and,
 - The distribution of the qualifying features within the site.

Threats / Pressures on Site Integrity²⁸

- 3.14 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

- 3.15 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.
- 3.16 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.

²⁶ Available at: <https://publications.naturalengland.org.uk/file/6711339502534656> [Accessed on 19/08/2026]

²⁷ Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0030080.pdf> [Accessed on 19/08/2026]

²⁸ Available at: <https://publications.naturalengland.org.uk/file/6679502935556096> [Accessed on 19/08/2026]

Qualifying Features²⁹

3.17 Annex I habitats:

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

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

- 1166 Great-crested newt *Triturus cristatus*

Conservation Objectives³⁰

3.19 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;

3.20 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
- 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

3.21 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,

²⁹ Available at: <https://sac.jncc.gov.uk/site/UK0013059> [Accessed on 19/08/2026]

³⁰ Available at: <https://publications.naturalengland.org.uk/file/6239619956080640> [Accessed on 19/08/2026]

³¹ Available at: <https://publications.naturalengland.org.uk/publication/6291480347934720> [Accessed on 19/08/2026]

- 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

- 3.22 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 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.
- 3.23 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

- 3.24 This site qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting populations of European importance of the following species:
- 3.25 Breeding species:
- A081 Marsh Harrier (*Circus aeruginosus*),
 - A132 Avocet (*Recurvirostra avosetta*),
 - A176 Mediterranean Gull (*Larus melanocephalus*),
 - A191 Sandwich Tern (*Sterna sandvicensis*),

³² Available at: <https://publications.naturalengland.org.uk/file/4840798817878016> [Accessed on 19/08/2026]

³³ Available at: <https://publications.naturalengland.org.uk/file/4840798817878016> [Accessed on 19/08/2026]

- A193 Common Tern (*Sterna hirundo*),
- A195 Little Tern (*Sterna albifrons*).

3.26 Passage species

- A294 Aquatic Warbler (*Acrocephalus paludicola*)

3.27 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*),

3.28 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

3.29 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;

3.30 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,
- 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

3.31 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.

³⁴ Available at: <https://publications.naturalengland.org.uk/file/6239619956080640> [Accessed on 19/08/2026]

³⁵ Available at: [Designated Sites View \(naturalengland.org.uk\)](https://publications.naturalengland.org.uk/publication/6239619956080640) [Accessed on 19/08/2026]

Dungeness, Romney Marsh and Rye Bay Ramsar

Introduction

- 3.32 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.
- 3.33 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

- 3.34 The site qualifies as a Ramsar site under the following criteria
- 3.35 Criterion 1
- 3.36 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)
 - 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)
- 3.37 Criterion 2
- 3.38 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.

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 19/08/2026]

- 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*

3.39 Criterion 5

3.40 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).

3.41 Criterion 6

3.42 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

3.43 Not defined for Ramsar sites.

Threats / Pressures to Site Integrity³⁷

- 3.44 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

- 3.45 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.
- 3.46 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

- 3.47 Annex I habitats:
- H1230 Vegetated sea cliffs of the Atlantic and Baltic coasts

Conservation Objectives³⁹

- 3.48 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;
- 3.49 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 habitat,
 - The structure and function (including typical species) of qualifying natural habitat, and

³⁷ Available at: <http://publications.naturalengland.org.uk/publication/5793096570765312> [Accessed on 19/08/2026]

³⁸ Available at: <https://publications.naturalengland.org.uk/file/5060393060007936> [Accessed on 19/08/2026]

³⁹ Available at: <https://sac.jncc.gov.uk/site/UK0013059> [Accessed on 19/08/2026]

- The supporting processes on which qualifying natural habitat rely.

Threats / Pressures to Site Integrity

3.50 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

- 3.51 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.
- 3.52 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.
- 3.53 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

- 3.54 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

- 3.55 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 19/08/2026]

⁴¹ Available at: <https://publications.naturalengland.org.uk/file/6413276653289472> [Accessed on 19/08/2026]

⁴² Available at: <https://sac.jncc.gov.uk/site/UK0012832> [Accessed on 19/08/2026]

⁴³ Available at: <https://publications.naturalengland.org.uk/file/6589251500376064> [Accessed on 19/08/2026]

- 3.56 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

- 3.57 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

- 3.58 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

- 3.59 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.

⁴⁴ Available at: <https://publications.naturalengland.org.uk/file/5534055007256576> [Accessed on 19/08/2026]

⁴⁵ Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11053.pdf> [Accessed on 19/08/2026]

Conservation Objectives

3.60 Not defined.

Threats / Pressures to Site Integrity

3.61 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

- 3.62 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.
- 3.63 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.
- 3.64 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.
- 3.65 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.
- 3.66 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).
- 3.67 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

⁴⁶ Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11053.pdf> [Accessed on 19/08/2026]

activities include walking and horse riding on the public footpaths and bridleways, recreational cycling, angling, and rowing.

Qualifying Features⁴⁷

3.68 Annex I species:

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

Conservation Objectives⁴⁸

3.69 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;

3.70 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

3.71 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

⁴⁷ Available at: <https://publications.naturalengland.org.uk/file/6099562012082176> [Accessed on 19/08/2026]

⁴⁸ Ibid

⁴⁹ Available at: <https://publications.naturalengland.org.uk/file/6616793980338176> [Accessed on 19/08/2026]

⁵⁰ Available at: http://www.apis.ac.uk/overview/pollutants/overview_NOx.htm. [Accessed on 19/08/2026]

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}.

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

Pollutant	Source	Effects on habitats and species
Sulphur Dioxide (SO ₂)	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. 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.	Wet and dry deposition of SO₂ acidifies soils and freshwater, and may alter the composition of plant and animal communities. The magnitude of effects depends on levels of deposition, the buffering capacity of soils and the sensitivity of impacted species. 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.
Acid deposition	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.	Gaseous precursors (e.g. SO₂) can cause direct damage to sensitive vegetation, such as lichen, upon deposition. 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. 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.
Ammonia (NH ₃)	Ammonia is a reactive, soluble alkaline gas that is released following decomposition and volatilisation of animal wastes. It is a	The negative effect of NH₄⁺ may occur via direct toxicity, when uptake exceeds

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.

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

Pollutant	Source	Effects on habitats and species
	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. 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). While ammonia deposition may be estimated from its atmospheric concentration, the deposition rates are strongly influenced by meteorology and ecosystem type.	detoxification capacity and via nitrogen accumulation. 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. 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.
Nitrogen oxides (NO _x)	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 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.	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. Deposition of nitrogen compounds (nitrates (NO₃), nitrogen dioxide (NO₂) and nitric acid (HNO₃)) 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 (N) deposition	The pollutants that contribute to the total nitrogen deposition derive mainly from oxidized (e.g. NO_x) or reduced (e.g. NH₃) 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.

Pollutant	Source	Effects on habitats and species
Ozone (O ₃)	A secondary pollutant generated by photochemical reactions involving Nox, 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 O₃ above 40 ppb can be toxic to both humans and wildlife, and can affect buildings. High O₃ 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. NOx 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 NOx footprint (92%) through associated road traffic. Other sources, although relevant, are of minor importance (8%) in comparison⁵⁶. Therefore, emissions of NOx 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 NOx 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 lichens and bryophytes are involved). Additionally, ecological studies have determined 'Critical Loads'⁵⁷ of atmospheric nitrogen deposition (that is, NOx 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 3 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.

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 19/08/2026]

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 19/08/2026]

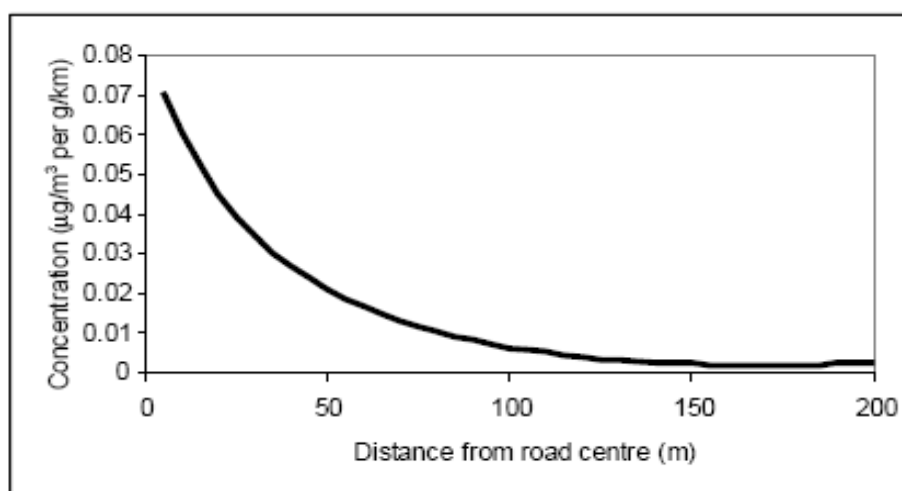


Figure 3: Traffic contribution to concentrations of pollutants at different distances from a road (Source: DfT⁵⁹)

- 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 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 Pevensy 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.

⁵⁹ Available at: <http://www.dft.gov.uk/ha/standards/dmrb/vol11/section3/ha20707.pdf> [Accessed on 19/08/2026]

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 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

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.

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.

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.

- 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 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

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

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.

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 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 19) 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 19) RLP are sensitive to increased recreational access, due to the allocation of residential development and are taken forward into screening:

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.

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.

- 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 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 19) 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 19) RLP assessed in this HRA provides for development in the area served by Southern Water as statutory wastewater treatment provider, 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

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

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 19) 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

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 13.5 kg N/ha/yr. The deposition rate may 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.

⁸⁰<https://www.wealden.gov.uk/UploadedFiles/Ashdown-Forest-Air-Quality-Monitoring-and-Modelling-August-2018-Volume-1.pdf> [Accessed on 19/08/2026]

⁸¹https://www.wealden.gov.uk/UploadedFiles/Ecological_Monitoring_At_Ashdown_Forest_Appendices.pdf [Accessed on 19/08/2026]

⁸²Ibid

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.

- 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:

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 19/08/2026]

⁸⁵ Available at: <https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0030080.pdf> [Accessed on 19/08/2026]

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 on 19/08/2026]

- 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 NO_x concentrations, ammonia concentrations or nitrogen deposition rates, very small changes in AADT would only affect those 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 Regulation 19 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 10.8 kg N/ha/yr. The deposition rate is greatest close to roads.

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.

- 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 19) 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 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 policies contained in the Draft (Regulation 19) 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 grazing marsh in the Dungeness, Romney Marsh and Rye Bay SPA/Ramsar:
- Policy SS1: Spatial Strategy for Rother and identified residential and employment sites associated with the strategy.
 - Policy SS5: Strategy for Accommodation Needs of Gypsies, Travellers and Travelling showpeople
- 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 19) 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 19) RLP makes any impact unlikely. Therefore, Likely Significant Effects (LSEs) can be excluded, and **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).**

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

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 19) 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 19) RLP sets out a minimum requirement to deliver 8,715 residential units and 26.2 ha of employment land in the Rother District. This increase in the local population will be 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:

⁸⁹ <https://www.midsussex.gov.uk/media/8433/ashdown-forest-visitor-survey-report-7th-march-2022.pdf> [accessed 28/08/26]

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

- 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 19) RLP on the Dungeness Complex regarding recreational pressure cannot be excluded and these sites are screened in for Appropriate Assessment.
- 5.36 The following policies contained in the Draft (Regulation 19) 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:
- Policy SS1 - Spatial Strategy: sets out minimum of 8,715 new dwellings (average of 512 dwellings per year) and 26.2 hectares of employment land. Site allocation provisions are in place for 7,225 dwellings and 119,876 sq m employment floorspace
 - Policy SS5 - Sites for Gypsies, Travellers and Travelling Showpeople provides for 17 additional permanent pitches (taking into account those already delivered in plan period)
- 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 19) RLP allocates 7,225 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

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

⁹² https://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]

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 19) RLP will not lead to Likely 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 19) 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:
- 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,

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]

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 3**.
- 5.52 Overall, LSEs of the Draft (Regulation 19) 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 policies contained in the Draft (Regulation 19) RLP are screened in for Appropriate Assessment in relation to water quality:
 - Policy SS1: Spatial Strategy for Rother identifies site allocations for employment floorspace and residential dwellings within 200m of the SPA/Ramsar which are identified in **Table 3**.
 - Policy SS5: Strategy for Accommodation Needs of Gypsies, Travellers and Travelling showpeople

Pevensey 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 Pevensey 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 or close to Rother District are:
 - Catsfield WwTW
 - Hooe WwTW
 - Lunsford Cross WwTW
- 5.57 The quantum of residential and employment development identified in the Draft (Regulation 19) RLP and associated with these WwTWs is identified in Table 3. 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 19) 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 policies contained in the Draft (Regulation 19) RLP are screened in for Appropriate Assessment in relation to water quality:

- Policy SS1: Spatial Strategy for Rother
 - Identified sites within the Pevensey Levels catchment. These sites are identified in Table 3.

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 policies contained in the RLP are screened in for Appropriate Assessment in relation to water quality:

- Policy SS1: Spatial Strategy for Rother and the identified residential and employment sites associated with the strategy. These sites are identified in Table 3.

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 19) 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 19) RLP are screened in for Appropriate Assessment in relation to water quantity level and flow:
- Policy SS1: Spatial Strategy for Rother
 - Identified sites within the Pevensey Levels catchment. These sites are identified in Table 3.

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 19) 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 increase of 108 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	Habitat⁹⁵	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	10 ⁹⁶	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.
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.
Great bittern (breeding)	Rich Fens	15	25	Yes	Potential negative impact on species due to impacts

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
					on the species' broad habitat.
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 11.1 kg/ha/yr, and 11.6 kg/ha/yr based on 1km APIS data for mid-year 2023. This is above the minimum critical load for Nitrogen for this habitat but below the maximum critical load for Nitrogen.
- 6.10 For identified areas of grazing marsh, APIS indicates deposition rates of 11.7 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 Policy DEV1: General Development Considerations: Environmental Pollution includes the statement in 1b that *"It does not unreasonably harm the amenities of existing or future occupants, adjoining and nearby properties and uses, including from different sources of pollution"*. Policy ENV8: Habitats & Species includes the statement "Development proposals likely to affect designated sites or irreplaceable habitats must meet the requirements set out in national planning policy relevant to the site designation or habitat status." Evidence is therefore required in the form of modelling for air quality impacts.
- 6.13 Modelling of air quality has been undertaken by AECOM for the Regulation 19 RLP, including the Local Plan growth and growth in the Rye Neighbourhood Plan, and other plans and projects (growth in surrounding authorities). The modelling concludes the following:
- NO_x – at no point will the critical level of 30 micrograms per cubic metre be breached.
 - Ammonia (NH₃) – at no point will the critical level of 3 micrograms⁹⁷ per cubic metre be breached.
 - Nitrogen – at no point will the critical load of 20 kgN/ha/yr be breached
- 6.14 Critical loads are primarily set to protect botanical criteria of habitats, such as species richness and percentage grass cover. The reasons for lowering the critical load for saltmarsh to 10 kgN/ha/yr are provided in the document 'Review and revision of empirical critical loads of nitrogen for Europe' (Bobbink et al., 2022). In Table 3.1, this document states that the effect of nitrogen deposition on upper-mid saltmarsh is 'increase in dominance of graminoids [grasses]; decline positive indicator species [i.e. certain plant species indicative of good botanical quality saltmarsh]' and the preceding text suggests this reduction of the critical load arose because an Irish study found a reduction in positive indicator species (i.e. plant species that can be found in a good quality saltmarsh) at deposition rates lower than the previous minimum critical load of 20 kgN/ha/yr.
- 6.15 Therefore, the lowest nitrogen critical load for saltmarsh of 10 kgN/ha/yr is driven by botanical criteria and in particular the desire to preserve or maximise the number of positive indicator plant species. However, the identified species (mediterranean gull, aquatic warbler and marsh harrier) do not feed on plants, using saltmarsh primarily for roosting (resting), hunting over, wading across and foraging in pools and creeks. These species are therefore not affected by the presence or absence (or abundance) of saltmarsh plant species, but rather by the structure of the habitat in very broad terms. Atlantic salt meadow is unlikely to become unsuitable for these species unless the habitat became so tall, dense and rank that it no longer provided suitable open habitat for foraging and roosting. The species would therefore only be affected by major structural changes to their habitat, and these would not arise until the upper nitrogen critical load of 20 kgN/ha/yr is exceeded. A critical load of 20 kgN/ha/yr is therefore appropriate for this assessment.
- 6.16 Following appropriate assessment, it can therefore be concluded that there will be no adverse effects on the integrity of Dungeness, Romney Marsh and Rye Bay SPA/Ramsar either alone or in-combination.

⁹⁷ 3 micrograms is the appropriate critical level as no bryophytes or lichens are present

Recreational Pressure

Dungeness Complex

- 6.17 The Draft (Regulation 19) RLP allocates a 7,225 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.
- 6.18 The strategic Dungeness Complex Sustainable Access and Recreation Management Strategy (SARMS) has been prepared in partnership with Folkestone & Hythe District Council with advice from Natural England.
- 6.19 The SARMS visitor assessment⁹⁸ 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.
- 6.20 It is therefore considered in this HRA that all net new housing within this 10km zone within Rother and Folkestone & Hythe could make a disproportionate 'in combination' contribution to recreational pressure in the Dungeness Complex to such an extent that mitigation would be required, 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. 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.
- 6.21 Policy ENV11 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.
- 6.22 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.
- 6.23 Policy ENV11 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 19) RLP on the Dungeness Complex and that recreational pressure. As a result, subject to

⁹⁸ [Dungeness Complex Sustainable Access and Recreation Management Strategy \(SARMS\) Supporting Document 4 – Visitor Assessment](#) (2017) [Accessed 19/08/2026]

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

- 6.24 It is recommended that the Draft Dungeness Complex SARMS is reviewed and updated to allow effective implementation of Policy ENV11. 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.
- 6.25 Since this recommendation was produced Natural England and Rother Council have agreed an amendment to policy wording in relation to the SARMS as follows: *'Developments that may have in an increase in recreational impacts to the Dungeness Complex of Habitats Sites (from walking, water-based sports, cycling, dog walking and tourism related development, for example), resulting in a likely significant effect, alone or in-combination with other plans or projects, will need to provide mitigation to avoid an adverse effect on integrity... The Council is working with Folkestone and Hythe District Council to agree a strategic approach to mitigation and once available, this will provide a mechanism for development to mitigate their impacts.'* The precise extent to which residential development in Rother District would be captured by this requirement is dependent upon updated visitor surveys which have not yet taken place, and a subsequent update to the SARMS so while at the moment there is no requirement for net new residential development to contribute to the SARMS that may change during the plan period. Rother District Council has run a potential developer tariff (based on Natural England advice) through viability assessment, and this did not identify any viability issues for the Local Plan.
- 6.26 Given the measures in place and amendment to policy it is considered that a conclusion of no adverse effects on integrity can be drawn.

Water Quality

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

- 6.27 The Dungeness, Romney Marsh and Rye Bay SPA/Ramsar and Pevensy Levels SAC/Ramsar were screened in for Appropriate Assessment for water quality.
- 6.28 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.

- 6.29 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.”*
- 6.30 The SIP for the Pevensey 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.
- 6.31 The specific focus of the SIP for the Pevensey 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 Pevensey Levels hydrological catchment is therefore of particular interest in the assessment below.
- 6.32 With regard to surface runoff, the Draft (Regulation 19) RLP includes **Policy ENV3: 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.
- 6.33 **Policy ENV3** also requires that surface water will pass through two treatment stages. When in the hydrological catchments of Pevensey Levels or the Dungeness Complex of Habitats Sites, a minimum of three stages will be required. Furthermore, **Policy ENV3** requires developments triggering an HRA to provide sufficient details of an appropriate water drainage scheme to satisfy the requirements of the HRA.
- 6.34 Furthermore, **Policy ENV1: 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.
- 6.35 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.⁹⁹ 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.
- 6.36 For the Cuckmere and Pevensey 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:

⁹⁹ Southern Water (2023) [Drainage and Wastewater Management Plan – Brava for the Rother Catchment](#) [Accessed 19/08/2026]

- Reducing the number of spills from the 66 storm overflows which together currently spill around 1200 times per annum;
 - 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.
- 6.37 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.
- 6.38 **Policy ENV4: Foul Water Drainage** 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.
- 6.39 Provided that the Draft (Regulation 19) RLP Policy ENV4 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

- 6.40 AECOM recommends the inclusion of the following:
- 6.41 In Policy ENV1: 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.
- 6.42 In Policy ENV4: 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.

- 6.43 This additional text is recommended because, as currently worded the policies do not specifically prohibit an adverse effect on the integrity of Habitats sites or the receiving water environment, but simply require the implications to be understood.

Water Quantity, Level and Flow

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

- 6.44 The Dungeness, Romney Marsh and Rye Bay SPA/Ramsar was screened in for water quantity, level and flow.
- 6.45 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.
- 6.46 The SIP for the Pevensey 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.
- 6.47 With regard to surface runoff, the Draft (Regulation 19) RLP includes **Policy ENV3: 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.
- 6.48 **Policy ENV3** also requires that surface water will pass through two treatment stages. When in the catchments of Pevensey Levels or the Dungeness Complex of Habitats Sites, a minimum of three stages will be required.
- 6.49 Sustainable Drainage Systems (SuDS) are considered to be the gold standard for reducing the volume of surface run-off that reaches sensitive ecological receptors by limiting the occurrence and magnitude of flooding. SuDS are interventions that manage surface water at source by limiting run-off to pre-development greenfield rates. The ultimate aim of SuDS is to control the quantity of run-off (by slowing and / or holding back some of the water) to protect the natural water cycle.
- 6.50 It is not possible to provide further assessment of SUDS at Local Plan stage as this requires actual design of SUDS for specific allocated sites, including size, layout and technology and related nutrient removal calculations, which is not possible until masterplans and planning applications are developed. However, the requirement for three stages of SUDS maximises protection of the SAC as this uses a sequence of natural drainage components to clean water incrementally before it leaves a developed site. A typical three-stage train includes:
- Stage 1: Captures and treats pollution directly where it lands (e.g., using permeable paving, green roofs, or filter strips).
 - Stage 2: Manages and further filters local runoff from a street or small cluster of buildings (e.g., routing water through vegetated swales or detention basins).

- Stage 3: Provides the final layer of biological treatment and retention for the entire site before final discharge (e.g., using a constructed wetland or retention pond).
- 6.51 Passing stormwater through these three sequential "trains" ensures that sediment settles out and pollutants are naturally broken down, protecting the SAC from environmental degradation. The management train concept promotes division of the area to be drained into sub-catchments with different drainage characteristics and land uses, each with its own drainage strategy. Dealing with the water locally not only reduces the quantity that has to be managed at any one point but also reduces the need for conveying the water off the site. Using the Simple Index Approach from The SuDS Manual (CIRIA C753, 2015), three trains of SuDS are confirmed to meet or exceed the pollution hazard index for all three pollutant groups (suspended solids, hydrocarbons and metals), associated with runoff from low-risk surfaces such as residential roofs, drives and car parks, providing adequate treatment with a pollution hazard index of approximately 1.3.
- 6.52 Furthermore, **Policy ENV3** requires developments triggering an HRA to provide sufficient details of an appropriate water drainage scheme to satisfy the requirements of the HRA.
- 6.53 **Policy ENV1: 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.
- 6.54 **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).
- 6.55 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.
- 6.56 Given the above evidence and inclusion of the requirement to maintain the yield of water it can be concluded that the Draft (Regulation 19) 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 19 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 screen out for LSEs and the remaining impact pathways were brought forward for appropriate assessment.
- 7.4 Following air quality modelling, atmospheric pollution was dismissed as predicted changes to traffic as a result of the RLP did not breach critical loads for the qualifying species.
- 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 the integrity of 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 19) RLP:
 - AECOM recommends that the Draft Dungeness Complex SARMS is completed and published to allow effective implementation of Policy ENV11. It is considered in this HRA that all net new housing within Rother District located within this 10km zone around the Dungeness Complex could have a disproportionate impact on the Complex (along with residents in a similar zone in Folkestone & Hythe) and therefore require mitigation, subject to the completion of updated visitor surveys to inform the updated SARMS, as agreed with Natural England.
 - 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 ENV11. 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 ENV3:
- All developments connected to Wastewater Treatment Works discharging into the catchment of the Pevensey Levels SAC 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 19) 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

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.

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.

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.

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 Shepway¹⁰⁰ 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	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
Bexhill	BX5	BEX0008	Land south-east of Beeching Road, Bexhill	Pevensey Levels SAC/Ramsar site: 2.6 km west	Mixed use: 200 dwellings - Commercial uses - Community uses	No likely significant effect The site does not lie within the Pevensey Levels Catchment and

¹⁰⁰ Note Shepway is now called Folkestone & Hythe District

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	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
		(Currently Allocated in the DaSA for an alternative use)		Dungeness, Romney Marsh and Rye Bay SPA/Ramsar: 16 km east		lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites.
Bexhill	BX6	BEX0077	Land adjacent to Bexhill Town Hall	- Pevensey Levels SAC/Ramsar site: 1.7 km west - Dungeness, Romney Marsh and Rye Bay SPA/Ramsar: 16 km east	The proposed development is for 36 residential units and retention of office use	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites.
Bexhill	BX7	BEX0078	Sainsburys Site, 1 Buckhurst Place	- Pevensey Levels SAC/Ramsar site: 1.7 km west - Dungeness, Romney Marsh and Rye Bay SPA/Ramsar: 16 km east	The proposed development is for 75 residential units and retention of retail use	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex.

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
						The development is therefore not likely to have a significant effect on Habitats Sites.
Bexhill	BX8	BEX0235 RR/2019/430/P (Currently Allocated in the DaSA for a mixed use development)	Land at Former High School Site	• Pevensey Levels SAC/Ramsar site: 3.1 km west • Dungeness, Romney Marsh and Rye Bay SPA/Ramsar: 15 km east	The proposed development is for 80 residential units	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites.
Bexhill	BX9	BEX0086 (A slightly smaller version of this site is currently Allocated in the DaSA for slightly fewer dwellings)	Land south of Terminus Road	• 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 14 residential units.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites.

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
Bexhill	BX10	BEX0031 RR/2020/577/P	30 Dorset Road, Bexhill	• Pevensey Levels SAC/Ramsar site: 4 km west • Dungeness, Romney Marsh and Rye Bay SPA/Ramsar: 16 km east	The proposed development is for 8 residential units.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites.
Bexhill	BX11	BEX0201	Rear of 11 Endwell Road, Bexhill	• Pevensey Levels SAC/Ramsar site: 3.4 km west • Dungeness, Romney Marsh and Rye Bay SPA/Ramsar: 15 km east	The proposed development is for 6 residential units.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites.
Bexhill	BX13	BEX0155	Eversley Road Car Park, Eversley Road	• Pevensey Levels SAC/Ramsar site: 2.0 km west	The proposed development is for 10 residential units.	No likely significant effect The site does not lie within the Pevensey

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
				Dungeness, Romney Marsh and Rye Bay SPA/Ramsar: 16 km east		Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites.
Bexhill	BX14	BEX02050	Land at Broad Oak Park	- 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 8 residential units.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites.
Bexhill	BX15	BEX0161	Land north of Broadoak Lane	- 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 35 residential units.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex.

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
						The development is therefore not likely to have a significant effect on Habitats Sites.
Bexhill	BX17	BEX0089	Gorses Car Park and Open Space, The Gorses	• Within the Pevensey Levels hydrological catchment area • Dungeness Romney Marsh and Rye Bay Ramsar: 19 km east.	The proposed development is for 10 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.
Bexhill	BX18	BEX0006 RR/2017/1705/P (Currently Allocated in the DaSA)	Land off Spindlewood Drive, Bexhill	• 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 146 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,

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
						likely significant effects on this Habitats Site with regards to water quality cannot be ruled out.
Bexhill	BX19	BEX0215	Land north of Barnhorn Manor Caravan Park	• Within the Pevensey Levels hydrological catchment area • Dungeness Romney Marsh and Rye Bay Ramsar: 20 km east.	The proposed development is for 20 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.
Bexhill	BX20	BEX0233	Land south of Barnhorn Road	• 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 (a) 400 dwellings (b) employment or commercial uses (c) community uses	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,

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
						likely significant effects on this Habitats Site with regards to water quality cannot be ruled out.
Bexhill	BX21	BEX0237	Land north of Rosewood Park	• 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 340 residential units and retail or community facilities.	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.
Bexhill	BX22	BEX0177	Land east of Sandhurst Lane	• Within the Pevensey Levels hydrological catchment area • Dungeness Romney Marsh and Rye Bay Ramsar: 18 km east.	The proposed development is for 68 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,

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
						likely significant effects on this Habitats Site with regards to water quality cannot be ruled out.
Bexhill	BX23	BEX0021	Land at Barnhorn Green	• Pevensey Levels SAC: 500 m north, within the Pevensey Levels hydrological catchment area • Dungeness Romney Marsh and Rye Bay Ramsar: 18 km east.	(a) medical centre and either (b) 2025 sqm employment floorspace or (c) employment floorspace and 5-10 dwellings	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.
Bexhill	BX24	BEX00239	Land south of Sandhurst Lane	• 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 25 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,

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
						likely significant effects on this Habitats Site with regards to water quality cannot be ruled out.
Bexhill	BX25	BEX0219	Beeches Farm and land north of Barnhorn Road	• 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 540 residential units, primary school, local shops and community uses	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.
Bexhill	BX26	BEX0240	Land at Northeye and adjoining land	• Pevensey Levels SAC/Ramsar: 570 m south, within the Pevensey Levels hydrological catchment area • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 19 km east.	The proposed development is for 364 residential unit and commercial use	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,

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
						likely significant effects on this Habitats Site with regards to water quality cannot be ruled out.
Bexhill	BX29	BEX0241 RR/2022/2364/P (A slightly smaller site is currently Allocated in the DaSA for a smaller number of dwellings)	Kiteye Farm and adjoining land	• Pevensey Levels SAC/Ramsar: 3.4 km southwest • Dungeness Romney Marsh and Rye Bay Ramsar: 16 km east	The proposed development is for 300 residential units.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites.
Bexhill	BX30	BEX0002 RR/2022/1584/P (Currently Allocated in the DaSA)	Land west of Watermill Lane (south)	• 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.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites.

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
Bexhill	BX31	BEX0115	Land west of Watermill Lane	• Pevensey Levels SAC/Ramsar: 3.5 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 15 km east	The proposed development is for 80 residential units.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites.
Bexhill	BX32	BEX0242	Land east of Watermill Lane	• Pevensey Levels SAC/Ramsar: 3.5 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 15 km east	The proposed development is for 170 residential units.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites.
Bexhill	BX33	BEX0017 RR/2018/2790/P	Land at Levetts Wood and Oaktree	• Pevensey Levels SAC/Ramsar: 3.9 km west	38,000 sqm employment floorspace	No likely significant effect

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
		(Currently Allocated in the DaSA for a smaller amount of employment floorspace)	Farm, Sidley, Bexhill	Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 15 km east		The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites.
Bexhill	BX34	BEX0243	Land north of Haven Brook Avenue (east)	- Pevensey Levels SAC/Ramsar: 4.5 km west, not within the Pevensey Levels hydrological catchment area - Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 16 km east	The proposed development is for 230 residential units.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Bexhill	BX35	BEX0244	Land north of Haven Brook Avenue (west)	- Pevensey Levels SAC/Ramsar: 3.4 km southwest. - Dungeness Romney Marsh and Rye Bay Ramsar: 16 km east	The proposed development is for 100 residential units or 45 residential units and a primary school.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
						distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Bexhill	BX36	BEX0245	Land west of Ninfield Road roundabout	• Pevensey Levels SAC/Ramsar: 3.3 km southwest, within the Pevensey Levels hydrological catchment area • Dungeness Romney Marsh and Rye Bay Ramsar: 17 km east	The proposed development is for 80 residential unit.	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.
Bexhill	BX37	BEX0220	Land west of Ninfield Road	• Pevensey Levels SAC: 2.9 km southwest, within the Pevensey Levels hydrological catchment area • Dungeness Romney Marsh and Rye Bay Ramsar: 16 km east	(a) 400 dwellings (b) retail and community building	Likely significant effect This development lies within the Pevensey Levels Hydrological Catchment Area. It is therefore considered probable that surface water discharge may

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
						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.
Bexhill	BX38		Land at St Francis Farm, Ninfield Road	• Pevensey Levels SAC: 2.5 km southwest, within the Pevensey Levels hydrological catchment area • Dungeness Romney Marsh and Rye Bay Ramsar: 16.5 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.
Bexhill	BX39	BEX0028	Land at Freezeland Farm, Freezeland Lane	• Pevensey Levels SAC/Ramsar: 3.9 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 16 km east	The proposed development is for 5 residential units.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
						distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Bexhill	BX40	BEX0032	Former Sidley Sports Ground, Glovers Lane	• 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.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Bexhill	BX41	BEX0005 (Currently Allocated in the DaSA)	Land adjacent to 276 Turkey Road, Bexhill	• Pevensey Levels SAC/Ramsar: 2.8 km southwest, within the Pevensey Levels hydrological catchment area • Dungeness Romney Marsh and Rye Bay Ramsar: 16.6 km east	The development proposals for the site are for 30 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,

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
						likely significant effects on this Habitats Site with regards to water quality cannot be ruled out.
Bexhill	BX42	BEX0071 RR/2022/1233/P	Cemetery Lodge, 250 Turkey Road, Bexhill On Sea	• 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.	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.
Bexhill	BX43	BEX0232	Our Lady of the Rosary Church, Southlands Road	• Pevensey Levels SAC/Ramsar: 3.32 km southwest, within the Pevensey Levels hydrological catchment area • Dungeness Romney Marsh and Rye Bay Ramsar: 16 km east	The proposed development is for 8 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,

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
						likely significant effects on this Habitats Site with regards to water quality cannot be ruled out.
Bexhill	BX44	BEX0197 RR/2015/1760/P	Land at Worsham Farm (East)	• Pevensey Levels SAC/Ramsar: 5.1 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 13 km east	The development proposals are for 354 residential units, primary school, sports pitches, community buildings, public open space	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Bexhill	BX45	BEX0194 RR/2015/1760/P	Land at Worsham Farm (West)	• 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 66 residential units.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
Bexhill	BX46	BEX0169	Plot 7, Bexhill Enterprise Park, Mount View Street	• Pevensey Levels SAC/Ramsar: 4.6 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 14 km east	The development proposals are for 25,000 sq m of commercial space.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Bexhill	BX48	BEX0246 RR/2017/963/P	Bexhill Enterprise Park – Escarpment Site B – south of Glovers End, Bexhill	• Pevensey Levels SAC/Ramsar: 4.5 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 14.5 km east	The proposed development is for 5,800 sq m of commercial space.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Bexhill	BX49	BEX0247	Land west of Bexhill Enterprise Park, Glovers Lane, Bexhill	• Pevensey Levels SAC/Ramsar: 4.4 km west	The development proposals are for 6,400 sq m of commercial footprint.	No likely significant effect The site does not lie within the Pevensey

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
				Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 14.5 km east		Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Bexhill	BEX0248	BEX0248	Land adjacent to site BX36, east of Watermill Lane (north)	- Pevensey Levels SAC/Ramsar: 3.5 km west - Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 15 km east	Primary school	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Battle	BT1	BAT0128	Land south of Hastings Road, Battle	- Pevensey Levels SAC/Ramsar: 8 km southwest - Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 12.5 km east	The development proposals are for 200 residential units.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex.

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
						The development is therefore not likely to have a significant effect on Habitats Sites
Battle	BT2	HAF0007	Land at Breadsell, Battle	• Pevensey Levels SAC/Ramsar: 8 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 12.5 km east	The development proposals are for 145 residential units.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Battle	BT3	BAT0070 RR/2022/1765/P	Beech Farm Battle	• Pevensey Levels SAC/Ramsar: 7 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 15 km east	The development proposals are for 1,895 sqm of commercial footprint.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
Battle	BT4	BAT0109	Land at Calbec House, Calbec Hill, Battle	• 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.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. • The development is therefore not likely to have a significant effect on Habitats Sites
Battle	BT5	BAT0129	Rutherfords Business Park, Marley Lane, Battle	• Pevensey Levels SAC/Ramsar: 11 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 12 km east	The development proposals are for 2,700 sqm of commercial footprint.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Battle	BT6	BAT0002	Land north of Sunny Rise, North Trade Road, Battle	• Pevensey Levels SAC/Ramsar: 6.5 km southwest	The development proposals are for 10 residential units.	No likely significant effect

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
				Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 16 km east		The site does not lie within the Pevensy Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Battle	BT7	BAT0083	Land at 1 Loose Farm Cottages, Hastings Road, Battle	- Pevensy 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.	No likely significant effect The site does not lie within the Pevensy Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Battle	BT8	BAT0121	Land east of Coronation Gardens, Battle	- Pevensy Levels SAC/Ramsar: 10 km southwest - Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 12 km east	The development proposals are for 75 residential units.	No likely significant effect The site does not lie within the Pevensy Levels Catchment and lies a considerable

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
						distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Battle	BT9	BAT0069	Land adjoining Little Brans, Battle, Battle	• Pevensey Levels SAC/Ramsar: 9 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 12 km east	The development proposals are for 73 residential units.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Battle	BT10	BAT0097	Battle Market Square, Battle	• Pevensey Levels SAC/Ramsar: 8 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 14 km east	The development proposals are for 52 residential units and retention of existing retail floorspace.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
						have a significant effect on Habitats Sites
Battle	GYP1	GYP0004	Land adjacent to High Views, Loose Farm Lane, Battle	• Pevensey Levels SAC/Ramsar: 9 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 12 km east	The development plans are for 1 pitch	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Battle	GYP2	GYP0007	Land south of Hastings Road, Battle	• Pevensey Levels SAC/Ramsar: 9 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 12 km east	The development plans are for 5 pitches	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
Battle	GYP4	GYP0001	Land adjacent to Fir Tree Cottage, Netherfield Hill, Battle	• Pevensey Levels SAC/Ramsar: 8 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 15 km east	The development plans are for 2 pitches	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Battle	NE1	BAT0108	Swallow Barn, Netherfield	• Pevensey Levels SAC/Ramsar: 7.5 km southwest, within the Pevensey Levels hydrological catchment area • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 18 km east	The development proposals are for 10 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.

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
Battle	NE2	BAT0088	White House Poultry Farm, Netherfield	• Pevensey Levels SAC/Ramsar: 7.3 km southwest and adjacent to the Pevensey Levels hydrological catchment area. • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 17.5 km east	The development proposals are for 24 residential units.	Likely significant effect This development is directly adjacent to the Pevensey 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.
Beckley	BC1	BEC0037 (A smaller version of this site is currently Allocated in the DaSA for fewer dwellings)	Land South and West of Buddens Green, Beckley Four Oaks	• Pevensey Levels SAC/Ramsar: 21 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 7 km southeast	The development proposals are for 20 residential units.	Likely significant effect The site is within 10 km of the Dungeness Complex and is therefore screened in for: • Atmospheric pollution
Beckley	BC2	BEC0024 (Currently Allocated in the DaSA for fewer dwellings)	Land East of Hobbs Lane, Beckley Four Oaks	• Pevensey Levels SAC/Ramsar: 22 km southwest	The development proposals are for 20 residential units.	Likely significant effect The site is within 10 km of the Dungeness Complex and is

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
				Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 7 km southeast		therefore screened in for: Atmospheric pollution
Beckley	BC3	BEC0011	Land west of Oaklea Cottages, Beckley Four Oaks	- Pevensey Levels SAC/Ramsar: 21 km southwest - Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 7 km southeast	The development proposals are for 10 residential units.	Likely significant effect The site is within 10 km of the Dungeness Complex and is therefore screened in for: Atmospheric pollution
Brede	BR1	BRE0002 (Currently Allocated in the DaSA)	Land west of the A28, Northiam Road, Broad Oak	- Pevensey Levels SAC/Ramsar: 17 km southwest - Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 7.5 km southeast	The development proposals are for 29 residential units.	Likely significant effect The site is within 10 km of the Dungeness Complex and is therefore screened in for: Atmospheric pollution
Brede	BR2	BRE0060	Land west of Tillingham View	- Pevensey Levels SAC/Ramsar: 17 km southwest - Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 7 km southeast	The development proposals are for 70 residential units.	Likely significant effect The site is within 10 km of the Dungeness Complex and is therefore screened in for:

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
						Atmospheric pollution
Brede	BR3	BRE0061	Land at Broad Oak Lodge, Chitcombe Road	- Pevensey Levels SAC/Ramsar: 17 km southwest - Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 8 km southeast	The development proposals are for 10 residential units.	Likely significant effect The site is within 10 km of the Dungeness Complex and is therefore screened in for: Atmospheric pollution
Brightling	BRI1	BRI0001 RR/2018/480/P	Coldharbour Farm Estate, Battle Road, Brightling	- 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.	Likely significant effect This development is directly adjacent to the Pevensey 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.

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
Burwash	BW1	BUR0042	Land north of Shrub Lane, Burwash	• Pevensey Levels SAC/Ramsar: 13 km south • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 23 m southeast	The development proposals are for 35 residential units.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Burwash	BW2	BUR0010	Land at 101 Shrub Lane, Burwash	• Pevensey Levels SAC/Ramsar: 13 km south • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 23 m southeast	The development proposals are for 6 residential units.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Burwash	BW3	BUR0031	Land east of Shrub Lane (north), Burwash	• Pevensey Levels SAC/Ramsar: 13 km south	The development proposals are for 15 residential units.	No likely significant effect The site does not lie within the Pevensey

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
				Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 23 m southeast		Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Burwash	BW4	BUR0032	Land east of Shrub Lane (south), Burwash	- Pevensey Levels SAC/Ramsar: 13 km south - Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 23 m southeast	The development proposals are for 8 residential units.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Burwash	BWC1	BUR0027	Land south of Heathfield Road, Burwash Common	- Pevensey Levels SAC/Ramsar: 12 km south - Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 25 km southeast	The development proposals are for 7 residential units.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex.

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
						The development is therefore not likely to have a significant effect on Habitats Sites
Burwash	BWC2	BUR0039	Old Orchard Nursery, Heathfield Road, Burwash Common	• Pevensey Levels SAC/Ramsar: 12.5 km south • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 23 m southeast	The development proposals are for 7 residential units.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Camber	CM1	CAM0001 (Currently Allocated in the DaSA)	Land at the Former Putting Green Site, Old Lydd Road, Camber	• 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.	Likely significant effect This site is located within 200 m 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

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
						effects on the SPA/Ramsar site. The site is within 10 km of the Dungeness Complex and is therefore screened in for: Atmospheric pollution
Camber	CM2	CAM0002 (Currently Allocated in the DaSA)	Land at the Central Car Park, Old Lydd Road, Camber	- Pevensey Levels SAC/Ramsar: 28 km south - Dungeness Romney Marsh and Rye Bay SPA/Ramsar: Adjacent	Tourism (including visitor accommodation), commercial, car parking and operational uses	Likely significant effect This site is located within 200 m 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. The site is within 10 km of the Dungeness Complex and is therefore screened in for: Atmospheric pollution

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
Camber	CM3	CAM0004	Lydd Road Garage, Lydd Road, Camber	• 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.	Likely significant effect The site is within 10 km of the Dungeness Complex and is therefore screened in for: • Atmospheric pollution
Catsfield	CT1	CAT0001 (Currently Allocated in the DaSA)	Land west of B2204, Catsfield	• Pevensey Levels SAC/Ramsar: 4.5 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 15.5 km east	The development proposals are for 30 residential units.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Catsfield	CT2	CAT0016	Land south of Wilton House Equestrian Centre, Catsfield	• 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.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex.

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
						The development is therefore not likely to have a significant effect on Habitats Sites
Catsfield	CT3	CAT0029	Land south of Church Road, Catsfield	• 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 35 residential units.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Crowhurst	CR1	CRO00038 (A smaller site is currently allocated in the relevant NP for fewer dwellings)	Land at Station Road/Forewood Lane, Crowhurst	• 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 25 residential units.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
Crowhurst	CR2	CRO0010 (Currently allocated in the relevant NP for fewer dwellings)	Land south of Forewood Rise, Crowhurst	• Pevensey Levels SAC/Ramsar: 7 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 13 km southeast	The development proposals are for 18 residential units.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Crowhurst	CR3	CRO0003 (Currently allocated in the relevant NP)	Land adjacent to Station Car Park, Crowhurst	• 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.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Etchingham	EC1	ETC0003	Land rear of Oxenbridge Row, Etchingham	• Pevensey Levels SAC/Ramsar: 14 km south	The development proposals are for 10 residential units.	No likely significant effect The site does not lie within the Pevensey

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
				Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 22 km southeast		Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Etchingham	EC2	ETC0024	Croft Field, Etchingham	- Pevensey Levels SAC/Ramsar: 14 km south - Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 20 km southeast	The development proposals are for 30 residential units.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Ewhurst	SC1	EWH0010	Land east of Stockwood Meadow, Northiam Road, Staplecross	- Pevensey Levels SAC/Ramsar: 15 km south - Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 12 km southeast	The development proposals are for 25 residential units.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex.

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
						The development is therefore not likely to have a significant effect on Habitats Sites
Ewhurst	SC2	EW0009	Land east of Hop Gardens, Northiam Road, Staplecross	• Pevensey Levels SAC/Ramsar: 15 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 12 km southeast	The development proposals are for 10 residential units.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Fairlight	FA1	FAI0001 (Currently Allocated in the DaSA)	Land east of Waites Lane, Fairlight Cove	• 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.	Likely significant effect The site is within 10 km of the Dungeness Complex and is therefore screened in for: • Atmospheric pollution
Guestling	GU1	HAF0001 (Currently Allocated in the DaSA)	Land north of A265, Ivyhouse Lane, Hastings	• Pevensey Levels SAC/Ramsar: 13 km west	The development proposals are for 2,500 sq m of commercial footprint.	Likely significant effect The site is within 10 km of the Dungeness Complex and is

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
				Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 5.5 km east		therefore screened in for: Atmospheric pollution
Guestling	GU2	HAF0026	Brackendale, Rock Lane, Hastings	- Pevensey Levels SAC/Ramsar: 14 km west - Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 5 km east	The development proposals are for 16 residential units.	Likely significant effect The site is within 10 km of the Dungeness Complex and is therefore screened in for: Atmospheric pollution
Guestling	GU4	GUE0012	Land at Wild Meadows, Chapel Lane, Guestling Green	- Pevensey Levels SAC/Ramsar: 16 km west - Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 3 km east	The development proposals are for 15 residential units.	Likely significant effect The site is within 10 km of the Dungeness Complex and is therefore screened in for: Atmospheric pollution
Guestling	GU5	GUE0013	, Former Guestling Highways Depot, Chapel Lane, Guestling Green	- Pevensey Levels SAC/Ramsar: 16 km west - Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 3 km east	The development proposals are for 8 residential units.	Likely significant effect The site is within 10 km of the Dungeness Complex and is therefore screened in for:

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
						Atmospheric pollution
Guestling	GU6	GUE0024	Field at Halfhouse, Butchers Lane, Three Oaks	- Pevensey Levels SAC/Ramsar: 16 km west - Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 3 km east	The development proposals are for 12 residential units.	Likely significant effect The site is within 10 km of the Dungeness Complex and is therefore screened in for: Atmospheric pollution
Hurst Green	HG1	HUG0021	Land south of Iridge Place, London Road, Hurst Green	- 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.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Hurst Green	HG2	HUG0033	Land to Rear of The Olde Bakery, London Rd, Hurst Green	- Pevensey Levels SAC/Ramsar: 16 km southwest - Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 19 km southeast	The development proposals are for 25 residential units.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
						distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Hurst Green	HG3	HUG0043	Land at The Lodge, London Road, Hurst Green	• Pevensey Levels SAC/Ramsar: 16 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 19 km southeast	The development proposals are for (a) 150 dwellings (b) A mix of uses that may include community, employment, leisure or retail	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Icklesham	RH1	ICK0003	Land at Stoneworks Cottages, Rye Harbour	• 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 40 residential units.	Likely significant effect 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

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
						development would not have likely significant effects on the SPA/Ramsar site. The site is within 10 km of the Dungeness Complex and is therefore screened in for: Atmospheric pollution
Icklesham	IK1		Land adjacent to Little Sherwood Industry Park, Icklesham	- Pevensey Levels SAC/Ramsar: 18 km west - Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 1.6 km southeast	The development proposals are for 30 residential units.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Icklesham	IK2	ICK0041	Land adjacent to Orchard Close, Icklesham	- Pevensey Levels SAC/Ramsar: 19 km west - Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 1.6 km southeast	The development proposals are for 38 residential units.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
						distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Iden	ID1	IDE0022 (Currently Allocated in the DaSA)	Land south of Elmsmead, Iden	• Pevensey Levels SAC/Ramsar: 26 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar¹⁰²: 1.7 km southeast	The development proposals are for 15 residential units.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Iden	ID2	IDE0010	Street Field, Main Street, Iden	• Pevensey Levels SAC/Ramsar: 26 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 1.5 km southeast	The development proposals are for 10 residential units.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex.

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	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
						The development is therefore not likely to have a significant effect on Habitats Sites
Mountfield	GYP6	GYP0009	Land adjacent to Valentine Ridge, A2100, Mountfield	• Pevensey Levels SAC/Ramsar: 9km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 14 km southeast	The development plans are for 6 pitches	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Northiam	NR1	NOR0003 (Currently Allocated in the DaSA)	Land south of Northiam Church of England Primary School, Northiam	• Pevensey Levels SAC/Ramsar: 20 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 10 km southeast	The development proposals are for 7 residential units.	Likely significant effect The site is within 10 km of the Dungeness Complex and is therefore screened in for: Atmospheric pollution
Northiam	NR2		Land South of Coppards Lane	• Pevensey Levels SAC/Ramsar: 21 km southwest	The development proposals are for 15 residential units.	Likely significant effect The site is within 10 km of the Dungeness Complex and is

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
				Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 10 km southeast		therefore screened in for: Atmospheric pollution
Peasmarsh	PE1	PEA0042	Land south of Main Street, Peasmarsh	- Pevensey Levels SAC/Ramsar: 23 km southwest - Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 4.4 km southeast	The development proposals are for 55 residential units.	Likely significant effect The site is within 10 km of the Dungeness Complex and is therefore screened in for: Atmospheric pollution
Peasmarsh	PE2	PEA0002 (Currently allocated in the DaSA)	Land south of Main Street, Peasmarsh	- 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.	Likely significant effect The site is within 10 km of the Dungeness Complex and is therefore screened in for: Atmospheric pollution
Peasmarsh	PE3	PEA0024	Tanyard, Main Street, Peasmarsh	- 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.	Likely significant effect The site is within 10 km of the Dungeness Complex and is therefore screened in for: Atmospheric pollution

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
Peasmarsch	PE4	PEA0033	Land east of Orchard Way, Peasmarsch	• Pevensey Levels SAC/Ramsar: 23 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 3.4 km southeast	The development proposals are for 5 residential units.	Likely significant effect The site is within 10 km of the Dungeness Complex and is therefore screened in for: Atmospheric pollution
Peasmarsch	PE5	PEA0029	Malthouse Business Park	• Pevensey Levels SAC/Ramsar: 23 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 3.6 km southeast	The development proposals are for 6 residential units and 500 sq m of commercial footprint.	Likely significant effect The site is within 10 km of the Dungeness Complex and is therefore screened in for: Atmospheric pollution
Playden	PL1	PLA0014	Land South of Poppyfields and Corner House	• Pevensey Levels SAC/Ramsar: 26 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 800 m southeast	The development proposals are for 15 residential units.	Likely significant effect The site is within 10 km of the Dungeness Complex and is therefore screened in for: Atmospheric pollution
Playden	PL2	PLA0008	Land between Saltcote and The Steps	• Pevensey Levels SAC/Ramsar: 26 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 440 m southeast	The development proposals are for 10 residential units.	Likely significant effect The site is within 10 km of the Dungeness Complex and is

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
						therefore screened in for: Atmospheric pollution
Rye	RY1	RYE0001 (Currently allocated in the relevant NP)	Former Tilling Green School	• Pevensey Levels SAC/Ramsar: 25 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 850 m southeast	The development proposals are for 25 residential units.	Likely significant effect The site is within 10 km of the Dungeness Complex and is therefore screened in for: Atmospheric pollution
Rye	RY2	RYE0002 (Currently allocated in the relevant NP)	Winchelsea Road (East Side)	• Pevensey Levels SAC/Ramsar: 25 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 43 m southeast	The development proposals are for 10 residential units and 500 sq m of commercial footprint.	Likely significant effect 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. The site is within 10 km of the Dungeness Complex

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
						and is therefore screened in for: Atmospheric pollution
Rye	RY3	RYE0003 (Currently allocated in the relevant NP)	Winchelsea Road (West Side)	- Pevensey Levels SAC/Ramsar: 25 km southwest - Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 200 m southeast	The development proposals are for 59 residential units and 1,900 sq m of commercial footprint.	Likely significant effect 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. The site is within 10 km of the Dungeness Complex and is therefore screened in for: Atmospheric pollution
Rye	RY4	RYE0004 (Currently allocated in the relevant NP)	Rye Creative Centre (Former Freda Gardham	Pevensey Levels SAC/Ramsar: 25 km southwest	The development proposals are for 50 residential units.	Likely significant effect This site is located within 200m of Dungeness, Romney

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
			School Site), New Road, Rye	Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 60 m west		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. The site is within 10 km of the Dungeness Complex and is therefore screened in for: Atmospheric pollution
Rye	RY5	RYE0005 (Currently allocated in the relevant NP)	Rock Channel Site	- Pevensey Levels SAC/Ramsar: 25 km southwest - Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 110 m southwest	The development proposals are for 80 residential units.	Likely significant effect 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

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
						SPA/Ramsar site. The site is within 10 km of the Dungeness Complex and is therefore screened in for: Atmospheric pollution
Rye	RY6	RYE0015	Council Depot, Cyprus Place	- Pevensey Levels SAC/Ramsar: 25 km southwest - Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 530 m south	The development proposals are for 7 residential units.	Likely significant effect The site is within 10 km of the Dungeness Complex and is therefore screened in for: Atmospheric pollution
Rye	RY7	RYE0016	Rye Boatyard, Rock Channel, Rye	- Pevensey Levels SAC/Ramsar: 25 km southwest - Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 60 m east	The development proposals are for 0.14 ha of commercial footprint.	Likely significant effect 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

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
						SPA/Ramsar site. The site is within 10 km of the Dungeness Complex and is therefore screened in for: Atmospheric pollution
Rye	RY8	RYE0057	17-19 Tower Street	- 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.	Likely significant effect The site is within 10 km of the Dungeness Complex and is therefore screened in for: Atmospheric pollution
Rye	RY9	RYE0006 (Currently allocated in the relevant NP)	Former Lower School Site, off Ferry Road, Rye	- Pevensey Levels SAC/Ramsar: 25 km southwest - Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 540 m east	The development proposals are for 88 residential units.	Likely significant effect The site is within 10 km of the Dungeness Complex and is therefore screened in for: Atmospheric pollution
Salehurst & Robertsbridge	GYP5	GYP0006	Land south of Redlands Lane, Salehurst	Pevensey Levels SAC/Ramsar: 14 km southwest	The development plans are for 4 pitches	No likely significant effect

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
				Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 16 km southeast		The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Salehurst & Robertsbridge	RB1	SAL0001	Land south of Heathfield Gardens, Robertsbridge	- Pevensey Levels SAC/Ramsar: 12 km southwest - Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 16 km southeast	The development proposals are for 55 residential units.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Salehurst & Robertsbridge	RB2	SAL0004 RR/2022/1850/P RR/2022/283/P (Currently allocated in the relevant NP)	Grove Farm, Robertsbridge	- 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.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
						distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Salehurst & Robertsbridge	RB3	SAL0002 (Currently allocated in the relevant NP)	Vicarage Land, Land south of the western end of Fair Lane, Robertsbridge	• Pevensey Levels SAC/Ramsar: 13 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 17 km southeast	The development proposals are for 10 residential units.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Salehurst & Robertsbridge	RB4	SAL0005	Culverwells, Land north of Station Road, Robertsbridge	• Pevensey Levels SAC/Ramsar: 13 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 17 km southeast	The development proposals are for (a) 21 dwellings (b) doctor's surgery.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
						have a significant effect on Habitats Sites
Salehurst & Robertsbridge	RB5	SAL0045 RR/2017/382/P (Currently allocated in the relevant NP for a smaller site and fewer dwellings)	Hodson's Mill, Robertsbridge	• Pevensey Levels SAC/Ramsar: 13 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 17 km southeast	The development proposals are for 125 residential units and 1,200 sq m of commercial footprint.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Sedlescombe	SD1	SED0001 (Currently allocated in the relevant NP)	Land at Sunningdale	• 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.	Likely significant effect The site is within 10 km of the Dungeness Complex and is therefore screened in for: • Atmospheric pollution
Sedlescombe	SD2	SED0003 (Currently allocated in the relevant NP)	Land at Church Hill Farm	• 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.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
						distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Sedlescombe	SD3	SED0004 (Currently allocated in the relevant NP)	Land at Sedlescombe Sawmills	• 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.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Sedlescombe	SD4	SED0005 (Currently allocated in the relevant NP)	Land adjacent to St John the Baptist Church	• Pevensey Levels SAC/Ramsar: 12 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 11 km southeast	The development proposals are for 17 residential units.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
						have a significant effect on Habitats Sites
Sedlescombe	SD5	SED0006 (Currently allocated in the relevant NP)	Land at Gate Cottage	• 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.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Sedlescombe	SD6	SED0007 (Currently allocated in the relevant NP)	Land at Church Hill Farm	• 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.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
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Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
Sedlescombe	SD7	SED0011	Marley Lane Business Park, Marley Lane, Battle	• 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.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Sedlescombe	SD8	SED0028	Land at Felon's Field, Marley Lane	• 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.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Sedlescombe	SD9	SED0020	Land north of Gorselands, Sedlescombe	• Pevensey Levels SAC/Ramsar: 12 km southwest	The development proposals are for 15 residential units.	No likely significant effect The site does not lie within the Pevensey

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
				Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 10.5 km southeast		Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Sedlescombe	SD10	SED0032	Land north of Brede Lane, Sedlescombe	- Pevensey Levels SAC/Ramsar: 14 km southwest - Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 9 km southeast	The development proposals are for 38 residential units.	Likely significant effect The site is within 10 km of the Dungeness Complex and is therefore screened in for: Atmospheric pollution
Ticehurst	SG1	TIC0079	Land at Lymden Lane, Stonegate	- Pevensey Levels SAC/Ramsar: 17 km southwest - Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 25 km southeast	The development proposals are for 5 residential units.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
Ticehurst	SG2	TIC0035	Land east of Bardown Road, Stonegate	• Pevensey Levels SAC/Ramsar: 17 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 25 km southeast	The development proposals are for 20 residential units.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Ticehurst	FW1	TIC0027	Land rear of Fruitfields, High Street, Flimwell	• Pevensey Levels SAC/Ramsar: 19 km southwest • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 23 km southeast	The development proposals are for 27 residential units.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Ticehurst	FW2	TIC0091	South of Hawkhurst Road, Flimwell,	• Pevensey Levels SAC/Ramsar: 19 km southwest	The development proposals are for 1,800 sqm employment floorspace	No likely significant effect The site does not lie within the Pevensey

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
				Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 23 km southeast		Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Ticehurst	FW3	TIC0101	North of Hawkhurst Road, Flimwell,	- Pevensey Levels SAC/Ramsar: 19 km southwest - Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 23 km southeast	The development proposals are for 35 residential units.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Ticehurst	TC4	TIC0087	Cedar Farm, London Road, Ticehurst		The development proposals are for 2,400 sq m of commercial footprint.	
Ticehurst	TC1	TIC0092	Land at Steellands Farm, Ticehurst	Pevensey Levels SAC/Ramsar: 18 km southwest	The development proposals are for 42 residential units.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
				Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 24 km southeast		lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Ticehurst	TC2	TIC0003 (Currently allocated in the relevant NP)	Orchard Farm, Ticehurst Village	- 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.	No likely significant effect The site does not lie within the Pevensey Levels Catchment and lies a considerable distance from the Dungeness Complex. The development is therefore not likely to have a significant effect on Habitats Sites
Westfield	WS1	HAF0023	Land east of Beaney's Lane, Hastings	- Pevensey Levels SAC/Ramsar: 12 km west - Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 7 km east	The development proposals are for 104 residential units.	Likely significant effect The site is within 10 km of the Dungeness Complex and is therefore screened in for: Atmospheric pollution

Parish	Policy	HELAA Site Reference Number	Development Site	Distance from Designated Sites ¹⁰¹	Brief Summary	Screening Outcome
Westfield	WS2	WES0021	Moor Farm, Westfield	• Pevensey Levels SAC/Ramsar: 13.5 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 7 km east	The development proposals are for 50 residential units.	Likely significant effect The site is within 10 km of the Dungeness Complex and is therefore screened in for: • Atmospheric pollution
Westfield	WS3	WES0040	Land on east side of Cottage Lane, Westfield	• 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.	Likely significant effect The site is within 10 km of the Dungeness Complex and is therefore screened in for: • Atmospheric pollution
Westfield	WS4	WES0046	Freshfields Farm, Westfield Lane, Westfield	• Pevensey Levels SAC/Ramsar: 13.5 km west • Dungeness Romney Marsh and Rye Bay SPA/Ramsar: 7 km east	The development proposals are for 3,500 sq m of commercial footprint.	Likely significant effect The site is within 10 km of the Dungeness Complex and is therefore screened in for: • Atmospheric pollution

Appendix B LSEs Policy Screening

7.10 Table 1 provides the LSE screening assessment of policies contained within the Draft (Regulation 19) 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 policies contained in the Draft (Regulation 19) RLP.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
Strategic Policies		
Policy SS1: Spatial Strategy for Rother	Sustainable and carefully managed growth - During the plan period 2025-2042, sustainable and carefully managed growth will be delivered in Rother to meet local needs for housing, employment, facilities and services together with supporting infrastructure. To achieve this, new development will be delivered in accordance with the spatial strategy (as illustrated in the Key Diagram) and provide for a minimum of: 8,709 new dwellings (average of 512 dwellings per year); and 26.2 hectares of employment land. - Whilst there is not an identified need for additional floorspace for main town centre uses, development proposals for these uses will be supported where they contribute to the vitality and viability of Rother's town centres and comply with other policies in the plan. - Identified needs for the gypsy, traveller and travelling showpeople community will be met through the provision of specific sites for pitches, in line with Policy SS5 (Strategy for Accommodation Needs of Gypsies, Travellers & Travelling Showpeople), together with windfall development of	This proposed policy sets out the 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. Potential linking impact pathways are: - Atmospheric pollution, - recreational pressure, - water quality, - water quantity, level and flow. This policy is screened in for Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	pitches, plots and transit sites, where necessary, in line with Policy HOU9 (Gypsies, Travellers & Travelling Showpeople). 4. Infrastructure required to support planned growth and new development will be secured and delivered in a timely manner, with reference to the Infrastructure Delivery Plan and in accordance with other Local Plan policies, including Policy INF1 (Strategic Infrastructure Requirements) and Policy INF2 (Transport Connectivity, Decarbonisation & Mitigation). Spatial distribution 5. Growth and new development in Rother will be landscape-led with an overall pattern of development that reinforces and strengthens the natural beauty of the High Weald National Landscape, protects and enhances the network of blue and green infrastructure, and responds positively to the district's network of existing settlements, so that: a. Bexhill will continue to act as a main transport, commercial and community hub, and support a network of settlements and communities surrounding it, which will benefit from their proximity to a wide range of services and facilities that are accessible by sustainable modes of transport. b. 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, commercial and community hubs, with improved active and public transport, better connecting the cluster of settlements to the towns. There are opportunities for sensitive growth in these clusters alongside new facilities and services for both new and existing residents to benefit from. 6. Based on these principles, the focus for growth will be in the following broad locations: a. West and North Bexhill to consolidate Bexhill as the most sustainable town, within the capacities of the existing transport network;	

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	b. The towns of Battle and Rye which act as key transport hubs, along with the clusters of villages based around them; c. 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; d. Development at Hastings Fringes, providing sensitive growth; e. Urban intensification and redevelopment across the district in appropriate and sustainable brownfield site locations; f. Sensitive development in other rural settlements of the district; and g. Growth along the A21 corridor, focussed within and around existing larger settlements.	
Policy SS2: Development Boundaries	15. Development boundaries, as defined on the Policies Map, establish the areas within sustainable settlements where new development will be directed to and supported, provided it complies with the Local Plan policies. 16. In the countryside (i.e., outside of 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. 17. Both within and outside of development boundaries, priority is given to the appropriate reuse of brownfield sites, in line with other Local Plan policies, in order to make efficient and sustainable use of previously developed land.	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.
Policy SS3: Strategic Green Gaps	Within the Strategic Green Gaps, as defined on the Policies Map, development will be carefully controlled. Development will only be permitted where it is unobtrusive and does not detract from the openness of the area having regard to the specific objectives of the gaps, which are as follows: To maintain the separate identity and distinctiveness between settlements; To maintain the strategic settlement pattern; and	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	To prevent the coalescence of settlements. Enhancement of the gaps through effective landscape management which strengthens and reinforces their significance will be supported. Within the Bexhill and Hastings/St Leonards Strategic Green Gap, development proposals for a ground mounted solar installation (a solar farm) for a temporary period at Pebsham Landfill Site, as identified on the Policies Map, will be supported in principle in line with Policy GTC6 (Renewable & Low Carbon Energy) and other policies of the Plan. The extent of each of the five strategic gap areas is described below: Bexhill and Hastings/St Leonards Strategic Green Gap The Gap between the two towns is relatively small, being particularly narrow along the A259 corridor, and hence any encroachment would be significant. Its 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 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. Crowhurst and Hastings/St Leonards Strategic Green Gap 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. Battle and Hastings/St Leonards Strategic Green Gap 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	There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	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. Fairlight and Hastings Strategic Green Gap 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. Rye and Rye Harbour Strategic Green Gap 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 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.	
Policy SS4: Strategy for the Countryside	The Countryside is an integral and defining feature of Rother that contributes significantly and positively to the district's local and historic character and distinctiveness. The overarching strategy for the Countryside, including the High Weald National Landscape and the undeveloped coast, is to ensure that its intrinsic character and beauty is safeguarded and enhanced, for the benefit of local communities and the environment. New development within the Countryside should be strictly limited to that which is shown to be necessary to meet identified local social and economic needs and appropriately supports: rural economic activities (including agriculture, horticulture, viticulture, forestry and equestrian uses) as well as	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	tourism; outdoor sport, leisure and recreation; cemeteries and burial grounds; nature conservation, restoration and enhancement; and infrastructure. To help achieve the delivery of the strategy for the Countryside, new development will be carefully managed whilst providing support for: a. Measures that support people's enjoyment of the Countryside, particularly by maintaining and improving appropriate access to and within it, together with enhancing opportunities for leisure and recreation. b. Agriculture, forestry, equestrian and other land-based rural economic activities, in line with Policies ECO9 (Agricultural Development & Forestry), ECO10 (Agricultural Diversification), and ECO11 (Equestrian Developments). c. Growing the visitor economy, in line with Policies ECO7 (Tourism activities, facilities and accommodation) and ECO8 (Holiday Sites & Accommodation). d. Development that meets identified local needs for housing and economic development, in line with Policies SS1 (Spatial Strategy for Rother), HOU3 (Rural Exception Sites & Community-led Development), HOU11 (New Dwellings in the Countryside) and ECO1 (Supporting a Thriving Local Economy). e. The delivery of infrastructure required to support local communities and to enhance accessibility within and between rural settlements and areas, helping to support the Live Well Locally priority, in line with Policies INF1 (Strategic Infrastructure Requirements) and INF2 (Transport Connectivity, Decarbonisation & Mitigation). Development proposals must make a positive contribution to the Countryside and be sensitive to its local context, with reference to the Local Plan as a whole. This will require that development conserves and enhances the intrinsic rural character and beauty of the Countryside, including landscapes	

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	and landscape features, dark skies, heritage assets and their setting, biodiversity and other components of the natural environment.	
Policy SS5: Strategy for Accommodation Needs of Gypsies, Travellers and Travelling Showpeople	To meet the identified accommodation needs for the gypsy, traveller and travelling showpeople community, provision will be made in Rother for 17 permanent pitches between 2025 and 2040.¹⁰³ These will be delivered in phases as follows: 2025-2030: 6 pitches 2030-2035: 5 pitches 2035-2040: 6 pitches In accordance with the national Planning Policy for Traveller Sites, sites or broad locations are allocated in the Local Plan to provide for this number of pitches, taking into account any pitches granted permission and delivered since the start of the plan period. Any remaining residual needs for pitches, plots and transit sites from the overall identified needs, will be met through windfall development, in accordance with Policy HOU9 (Gypsies, Travellers and Travelling Showpeople).	This policy sets out the strategy for sites for Gypsies, Travellers and Travelling Showpeople. It identifies an overall quantum of pitches and therefore increased numbers of people. Potential linking impact pathways are: • Atmospheric pollution, • recreational pressure, • water quality, • water quantity, level and flow. This policy is screened in for Appropriate Assessment
Policy SS6: Neighbourhood Plans & Parish Priority Statements	Parish and town councils are encouraged to prepare and review Neighbourhood Plans and Parish Priority Statements to set out a vision and priorities for the future of their local areas, having regard to the Local Plan. Housing targets To support the delivery of the Local Plan, the following housing targets are for Neighbourhood Areas, covering the plan-period, are set out (Table provided in Regulation 19 Plan).	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

¹⁰³ The Local Plan period is to 2042. The current evidence (East Sussex GTAA, 2022) considers the period to 2040. From 2025 this does allow for 15 years, in line with the requirements of the national PPTS. The GTAA Update will address provision over the plan period.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	Housing supply and delivery pending Neighbourhood Plans Until such time as a Neighbourhood Plan for the relevant settlement with an outstanding Local Plan housing requirement is in force, development proposals will be favourably considered in those settlements where: a. They contribute to meeting the housing target for that settlement and accord with the relevant spatial strategy; and b. The site and development proposals are otherwise suitable having regard to other relevant policies of the Local Plan.	
Green to the Core		
Policy GTC1: Net Zero Development	Operational Energy All new development proposals must prioritise a ‘fabric first’ approach and be designed and orientated to minimise energy demand for heating, lighting and cooling, in accordance with Policy LWL6. Opportunities to provide solar PV and energy storage must be incorporated where feasible, and opportunities to connect to district heat networks and decentralised electricity networks should be considered where these are available. Compliance with the applicable requirements of this policy will be required to be demonstrated through the submission of proportionate information with the planning application. Major development proposals must be supported by an Energy Statement. All new dwellings will be expected to achieve the following: a. For new builds, a 100% improvement over the dwelling Target Emissions Rate (TER), equivalent to a Dwelling Emission Rate (DER) of zero, calculated using [specified SAP methodology/version].	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	b. For conversions to residential development, a Building Research Establishment Environmental Assessment Method (BREEAM) 'Excellent' standard as a minimum. c. Where it is demonstrated through the information submitted with the application that the 100% TER improvement required by criterion 4(a) is not technically feasible, the development must achieve the maximum feasible improvement over TER. The submitted information must clearly identify the technical constraints and the measures considered to maximise performance. Non-residential development (including building conversions) should achieve: a. A LETI TEUI Target for Operational Energy of: i. For office buildings (Class E(g)(i)) - 55 kWh/m²/year (GIA); ii. For light industrial buildings (Class E(g)(ii) and (iii)) - 65 kWh/m²/year (GIA); and iii. For general industrial and warehousing buildings (Class B2, B8 and associated Sui Generis), a feasibility statement to evidence a practicable TEUI Target; and b. A BREEAM 'Excellent' standard as a minimum. If BREEAM is updated or replaced during the plan period, the equivalent replacement requirements will be applied. Embodied Carbon All new development proposals must meet the following embodied carbon standards, with compliance demonstrated in accordance with criterion (3) above: a. All residential development must achieve a LETI C rating for embodied carbon emissions, equating to 600 kgCO₂/m² upfront embodied carbon and 970 kgCO₂/m² total embodied carbon. From 1	

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	January 2030, a LETI A rating must be achieved, equating to 300 kgCO₂/m² upfront embodied carbon and 450 kgCO₂/m² total embodied carbon. b. All office development should achieve a LETI C rating for office development, equating to 600 kgCO₂/m² upfront embodied carbon and 970 kgCO₂/m² total embodied carbon. From 1 January 2030, a LETI A rating must be achieved, equating to 350 kgCO₂/m² upfront embodied carbon and 530 kgCO₂/m² total embodied carbon.	
Policy GTC2: Net Zero Retrofitting	Development proposals which result in considerable improvements to the energy efficiency and reduction of carbon emissions of existing buildings will be supported. Development affecting statutorily and non-statutorily protected historic buildings, or within Conservation Areas, should be guided by Historic England advice on climate change and historic building adaptation. Alterations and extensions to existing buildings which comprise major development must: - Provide an Energy Statement which aligns with the six principles for best practice in LETI's Climate Emergency Retrofit Guide. - Meet BREEAM Domestic Refurbishment Excellent standard, as a minimum, when delivering 10 dwellings or more. - Demonstrate that due consideration has been given to the carbon efficiency of the whole building.	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.
Policy GTC3: Construction Materials and Waste	Development proposals that reuse previously developed land and buildings, consistent with maintaining and enhancing local character and distinctiveness, will be supported subject to other Local Plan policies. Major development proposals involving demolition and/or refurbishment will be required to demonstrate through the planning application how opportunities to reuse and recycle materials that arise through demolition	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	and refurbishment have been maximised, including through the reuse of excavated soil and hardcore within the site. All major development proposals involving demolition will be required to undertake a pre-demolition audit, to determine products and materials for re-use. Major development must demonstrate how buildings have been designed, where practicable, to facilitate future adaptation, disassembly and the reuse or recovery of components and materials.	There are no impact pathways present and this policy is screened out from Appropriate Assessment.
Policy GTC4: Water Efficiency	All new development proposals should minimise their impact on water resources. Proposals should seek opportunities to integrate rainwater and/or grey-water storage and recycling measures, green roofs and walls, and other water efficiency measures. All new dwellings are required to be designed to achieve a water consumption rate of no more than 100 litres per person per day.	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.
Policy GTC5: Heat Networks	Development proposals for decentralised low-carbon energy infrastructure, including district heat networks, will be supported where compatible with other policies in the Local Plan. Where an existing or committed heat network is capable of serving a development, development proposals should be designed to enable connection to the network and will be expected to connect where technically and financially feasible.	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.
Policy GTC6: Renewable and Low Carbon Energy	Development proposals for renewable and low carbon energy generation will be supported where: They will not result in unacceptable adverse impacts on landscape character including the High Weald National Landscape; trees, woodland and hedgerows; higher quality agricultural land ; or heritage assets;	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	b. They will avoid unacceptable visual impact from the effect of glint and glare and shadow flicker on the landscape, on neighbouring uses and aircraft safety; Weight will be given to proposals for community-led renewable and low energy generation initiatives, including those proposed through Neighbourhood Planning. In addition, the following criteria will be used to assess specific generation types: Solar a. Proposals for roof-mounted solar energy supply infrastructure will be supported, subject to other policies and Policy HER1 (Heritage Management) in particular. b. Stand-alone ground mounted installations will be supported, subject to other policies, on previously developed land. c. Proposals for ground-mounted installations on greenfield land will be considered in line with other Local Plan and national planning policies, particularly those relating to landscape impact and the effect on the best and most versatile agricultural land. Greenfield sites within, or affecting the setting of, the High Weald National Landscape are unlikely to be suitable locations for commercial scale ground-mounted solar farms. Energy Storage d. Proposals for energy storage will be supported subject to other policies, where it is co-located with an existing or proposed renewable energy development or can be shown to alleviate grid constraints and demonstrate fire and leak containment safety. Land at Pebsham Landfill Site, as identified on the Policies Map, is suitable in principle for a stand-alone ground mounted solar installation for a temporary period , subject to other Plan policies.	

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
5. Live Well Locally		
Policy DEV1: General Development Considerations	In addition to considerations set out by other policies, all development proposals must meet the following criteria: a. It meets the needs of future occupiers, including providing appropriate amenities and the provision of appropriate means of access for disabled users; b. It does not unreasonably harm the amenities of existing or future occupants, adjoining and nearby properties and uses, including from different sources of pollution; c. It responds positively to the character and appearance of the locality; and d. It is compatible with both the existing and planned use of adjacent land and demonstrates appropriate regard to the site's previous use and characteristics.	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.
Policy DEV2: Comprehensive Development & Masterplanning	Planning applications (including in outline and full format) must ensure a comprehensive approach to development, including where individual sites form part of a larger site and/ or where sites are in multiple ownerships. When an outline planning permission is sought for major development, the application must be supported by a masterplan and a proportionate suite of parameter plans defining the key spatial and design parameters necessary to demonstrate how the comprehensive development of the entire site can be achieved and to provide a clear framework for subsequent reserved matters applications. In circumstances where it would speed up delivery, a planning application for part of a larger site may be permitted, but only where it 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.	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	In applying this policy, regard will be had to all relevant policies in the Local Plan, including Policies LWL1-LWL8, to ensure a coordinated approach across the entire development site to land use, density and built form, affordable housing, sustainable transport and access, green and blue infrastructure (including biodiversity net gain and sustainable drainage), and other infrastructure (secured directly or through funding contributions).	
Policy LWL1: Efficient Use of Land & Appropriate Densities	All development proposals must make efficient use of land and optimise site capacity through a design-led approach to layout, scale, form, massing, building typology and relationship to context. Within the High Weald National Landscape, its setting, and other designated or locally important landscapes and historic environments, densities and layouts must respond to landscape character, settlement pattern, heritage significance and setting, in accordance with Policy LAN2 (High Weald National Landscape) and other relevant policies. Residential Development Proposals involving new residential development must achieve an appropriate density having regard to surrounding form, grain, building heights, character, heritage assets and their settings, and the need to deliver high-quality, context-responsive design. Schemes relying predominantly on large, detached dwellings or other low-yield layouts will not be supported unless clearly justified by site context, landscape, heritage or other policy requirements. For new residential development, the following net density ranges, expressed in dwellings per hectare, will apply: a. Bexhill Urban Area (BX1): 110–130+ dwellings per hectare (dph). b. Bexhill Suburban areas: 45–75 dph. c. Historic Towns (Rye and Battle): 35–80 dph. d. Live Well Locally areas: 35–55 dph.	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	e.Village areas (within development boundaries): 25–45 dph. Countryside areas, including villages and hamlets without development boundaries: no minimum density range applies. Where residential development is supported by other policies in this Plan, density will be determined through a design-led assessment of site context in line with the other requirements of this policy. The area types are defined on the Policies Map. Where a site crosses more than one area type, the relevant density range will apply to each part of the site unless a different distribution of density is justified through a site-wide design approach, having regard to the Policies Map, site context and size, accessibility, landscape, heritage and the role of each parcel within the scheme. Development below the density ranges set out above will only be supported where the applicant demonstrates, through evidence, that: a. Site-specific constraints prevent the required density being achieved while delivering high-quality design and avoiding unacceptable impacts (for example on neighbouring residents); b. Those constraints cannot reasonably be addressed through an alternative design, layout, housing mix or building typology; and c. The proposal would still make efficient use of land and deliver a high-quality, context-responsive design in accordance with this policy. 8. Densities above the relevant range may be supported where the proposal is in a highly accessible location and demonstrates high-quality design, acceptable amenity and successful integration with its surroundings. Employment, Commercial and Mixed-Use Development Employment, commercial and mixed-use development must make efficient use of land and buildings. Proposals must demonstrate that the layout, plot ratio, building height, servicing, parking, yard space, landscaping and future	

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	adaptability have been designed to optimise employment and commercial floorspace and operational efficiency, while responding positively to local character, landscape context, access and amenity considerations.	
Policy LWL2: Facilities and Services for residential development	Access to local amenities and services All proposals for new residential development must demonstrate that residents will have safe, realistic and convenient access to a range of everyday local amenities and services, proportionate to the scale of development and the role and function of the settlement. The local amenities and services must either already be present and capable of being reached by all users via a safe, well-connected active travel network, improved where necessary as part of the development, or be provided or secured as part of the development. In Bexhill Urban Area, Bexhill Suburban areas, Historic Towns and Live Well Locally area types (as defined on the Policies Map), all new dwellings shall ordinarily be located within approximately 800 metres, equivalent to around a 10-minute walk, of a range of local amenities. Distances must be measured using safe and realistic active travel routes rather than straight-line distance, taking account of barriers, gradients, crossing points, route quality and accessibility for all users. In Village and Countryside area types, all new dwellings must be located within a reasonable active travel distance of a range of local amenities appropriate to the scale and function of the settlement and the development. Distances greater than 800 metres will be acceptable where justified by local context, the scale and nature of the development, the availability of services, and the role and relationship of the site to nearby settlements. Where the range of local amenities accessible by active travel is more limited, development must, where possible, demonstrate that residents would have practical and convenient access to regular and reliable public transport connections to nearby centres where a wider range of amenities are available.	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	Public transport access A public transport stop with a frequent, reliable service is a local amenity or service within the meaning of part (A) of this policy, where it is within approximately 400 metres or a 5-minute walk of new dwellings in the Bexhill Urban Area, Bexhill Suburban areas, Historic Towns and Live Well Locally area types, or approximately 800 metres in the Village and Countryside areas. Public transport access will not, by itself, justify development in an otherwise unsustainable location, but may form part of the overall assessment where active travel access to some everyday amenities is limited and where regular, reliable and convenient services are available or can be secured as part of the development. Policy LWL3 sets out additional requirements for active travel and public transport connections for residential development of 10 or more dwellings. Indoor meeting places In addition to Parts (A) and (B), development proposals of 250 dwellings or more, and smaller proposals forming part of a wider planned growth area, where justified by evidence of need, must provide or contribute proportionately to a digitally connected, flexible and multifunctional indoor meeting place, where necessary to meet needs arising from the development or wider planned growth area. Provision may be made through the enhancement of an existing facility where it is accessible from the site and has capacity to meet the needs arising from the development, or through the provision of a new facility. Indoor meeting places must be designed to be accessible, adaptable and resilient to climate change, including by providing a comfortable internal environment during periods of extreme heat.	
Policy LWL3: Active Travel, Public Transport	For the purposes of this policy, and other policies in this Plan where the term is used, “active travel” means walking, wheeling and cycling, and,	There are no LSEs of this policy on Habitats Sites.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
Connections & Services Outside the Site	where appropriate, horse riding. Wheeling includes the use of wheelchairs, mobility scooters and other mobility aids. All development must protect the continuity, safety, accessibility and usability of existing active travel routes and access to public transport and must not create or worsen barriers to active travel. Active travel and public transport connections and services All residential development proposals of 10 or more dwellings must provide, or where necessary contribute proportionately to, direct, safe, comfortable, attractive and inclusive active travel routes from the site boundary to: - Existing or proposed public transport stops served by a frequent and reliable service, or where such a service will be secured as part of the development; and - The wider active travel movement network which provides access to services and facilities outside the site. Residential development of 50 or more dwellings must additionally provide comprehensive and integrated connections between the site's internal active travel network and the surrounding movement network, including multiple connections from the site boundary. Proposals for non-residential development likely to generate significant travel demand must also provide, or where necessary contribute proportionately to, direct, safe, comfortable, attractive and inclusive active travel connections to public transport and the wider movement network, together with any necessary and proportionate improvements to public transport services or infrastructure. Routes and connections required by this policy may include the provision of new routes or the improvement or extension of existing routes. Public Rights of Way must be retained in accordance with Policy HWB7. Active travel routes, crossings, junctions and transitions must form a continuous and legible network and be designed having regard to the latest Local	This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	Transport Note 1/20, the Active Travel England Rural Design Guide and any successor guidance. The particular active travel and public transport requirements arising from a development must be proportionate to its scale, location and likely travel impacts and supported by proportionate transport evidence, which may include a Transport Statement or Transport Assessment as appropriate. The measures proposed must, where relevant, support the delivery of local transport strategies and plans, including the East Sussex Local Cycling and Walking Infrastructure Plan. Where the frequency, reliability or convenience of existing public transport services is insufficient to serve the development, but the location is otherwise acceptable having regard to the spatial strategy and Policies LWL1 and LWL2, proposals must secure necessary and proportionate improvements or contributions. Coastal access All development affecting coastal access must retain public access to the coast and, where opportunities arise, enhance it. Development affecting the King Charles III England Coast Path National Trail must protect its continuity, safety, setting and accessibility.	
Policy LWL4: Active Travel & Public Transport Within Sites	Development proposals that create or materially alter streets, routes or movement networks must provide a coherent, direct, safe, inclusive and legible movement network that prioritises active travel and access to public transport and connects effectively with surrounding streets, routes and facilities. Development proposals must: Connections and desire lines Respond to active travel desire lines and provide direct, convenient and accessible connections within the site and to surrounding streets and routes, public transport stops, local facilities and neighbouring areas; Connected streets, paths and routes	There are no LSEs of this policy on Habitats Sites. This 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 policy could provide for increased recreational pressure in sensitive Habitat Sites, however, no routes are specified. This policy also has the ability to reduce atmospheric pollution by enhancing non carbon transport routes.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	Use simple, connected and legible street and route patterns. Streets and active travel routes must be as direct and legible as practicable, and active travel routes must be at least as direct and convenient as equivalent routes by private car and, where practicable, more direct and convenient. Cul-de-sacs and other severed layouts will not be supported where safe and practical connections can be made. Development must provide continuous publicly accessible streets or active travel routes to and along site edges where this would improve permeability, avoid unnecessary detours or better integrate the site with adjoining areas, including through filtered permeability where appropriate; Safe and inclusive movement Ensure routes, access points, crossings and junctions are safe, inclusive, overlooked, accessible to all users and easy to navigate, and are designed having regard to relevant national and local guidance; Through traffic Use filtered permeability or other appropriate measures where necessary to prevent private vehicles using the site as a shortcut for longer journeys, while maintaining direct access for active travel, public transport and emergency vehicles; Future connections Enable direct active travel connections to adjoining allocated, planned, proposed or otherwise reasonably foreseeable development, including by providing routes to site boundaries and safeguarding connections where adjoining land is undeveloped.	There are no impact pathways present and this policy is screened out from Appropriate Assessment.
Policy LWL5: Well-designed and Distinctive Places	All development proposals must achieve high standards of design and create well-designed, distinctive places. Proposals must meet the following criteria, with the level of detail required proportionate to the scale, nature and location of the development. Context, character and local distinctiveness	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	Development must demonstrate a clear understanding of site context, settlement pattern, streetscape and landscape character, townscape and local distinctiveness, including how site constraints and opportunities may change in response to climate change. It must conserve, enhance and where appropriate draw inspiration from this context, whether using traditional or contemporary design approaches. Design concept, materials and landscape design Development must be informed by a clear design concept and be visually attractive. The design concept must inform the layout, form, appearance, landscape design, choice of materials, finishes and detailing, and must be demonstrated through proportionate design information submitted with the planning application. Buildings and spaces must contribute positively to the composition and visual character of the development and its surroundings. High Weald National Landscape Development within the High Weald National Landscape, or affecting its setting, must respond positively to its distinctive landscape character, settlement pattern and scenic beauty, in accordance with Policy LAN2 (High Weald National Landscape) and, where relevant, the High Weald AONB Housing Design Guide. Existing assets and site features Development must retain and integrate existing site assets, including mature trees, hedgerows, ponds, watercourses, natural drainage routes, landscape features, heritage features, important views and topography, as anchor features within the layout and design, unless their loss is clearly justified. Futureproofing and safeguarding Development must use land efficiently and be designed so as not to prejudice future connectivity, climate resilience or the coordinated	Development proposals brought forward under this policy will require an HRA. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	development of adjoining land, where development of that land is allocated, planned, proposed or otherwise reasonably foreseeable. Materials, circular economy and bioregional design Development must, proportionate to its scale and nature, use durable, repairable, low-carbon and responsibly sourced materials that respond positively to local character, landscape context and whole-life carbon impacts. Development must, proportionate to its scale and nature, prioritise the retention, reuse and recovery of materials, minimise waste and support adaptability and design for disassembly where feasible. Where appropriate to the site context, design approach and building function, development must facilitate the use of local and certified well-managed timber. Stewardship and long-term management Major development, and other development where significant shared spaces, community assets, green and blue infrastructure, sustainable drainage, play space or other communal assets are proposed, must demonstrate proportionate arrangements for their long-term management and maintenance. Design assessment frameworks Major residential development must submit a Building for a Healthy Life assessment. Smaller residential development is encouraged to apply Building for a Healthy Life proportionately, while major non-residential and major mixed-use development must demonstrate how relevant Building for a Healthy Life principles and any other appropriate design assessment frameworks have informed the design. Independent design review will be required for strategic site allocations and other significant development where justified by the scale, complexity, prominence or sensitivity of the proposal. Applicants must demonstrate how the recommendations of the review have informed the development.	

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	Major development, and other development involving significant green and blue infrastructure, must demonstrate proportionately how the principles of Building with Nature, or successor documents, have informed its design, delivery and long-term management.	
Policy LWL6: Built Form	All development proposals must achieve a built form, layout and orientation that responds positively to landscape, townscape, settlement pattern, site conditions and climate, creates safe, legible, inclusive and energy-efficient places, and makes efficient use of land. Proposals must meet the following criteria, with the level of detail required proportionate to the scale, nature and location of the development. Requirements applying to all development i) Landscape, levels and drainage. Where relevant, development must be informed by a landscape, levels and drainage strategy that determines the capacity and layout of the site. Buildings, streets, spaces, drainage infrastructure and green and blue infrastructure must respond to and positively integrate topography, natural flow routes, watercourses, ditches, ponds and other relevant site features. Proportionate levels and contour information must be provided where necessary. Major development must be supported by accurate existing and proposed contour plans and levels information, and by a SuDS Concept Design prepared in accordance with Policy ENV3, demonstrating how levels, topography and drainage have informed the layout, built form, access, landscape and green and blue infrastructure. ii) Orientation, microclimate and energy. Development must demonstrate how the orientation of buildings, streets and spaces has responded to settlement pattern, site conditions, landscape and townscape character, microclimate, views, existing features, natural surveillance, passive solar gain, overheating risk and opportunities for low-carbon and renewable energy generation.	There are no LSEs of this policy on Habitats Sites. This is a developed management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	Orientation, roof form, massing and layout must optimise opportunities for passive solar gain, reduce overheating risk and enable solar energy generation and other low-carbon technologies where this can be achieved without undermining local character, heritage significance, landscape character or wider placemaking objectives. Major residential development must integrate compact building forms across the development as part of the overall layout, density strategy and housing mix. iii) Legibility, street hierarchy and variation. Development must create a legible built form through the arrangement of streets, routes, buildings, spaces, landmarks, views, building lines and materials. Built form, landscape structure and retained site features must help people understand and move through the development easily. Major development, and other development creating a network of streets or public spaces, must provide a clear street hierarchy and meaningful variation between street types, reflecting their place, movement and access functions, spatial character, enclosure, landscape and relationship with buildings and public spaces. iv) Building lines, enclosure and active frontage. Development must use perimeter blocks, defined building lines and cohesive building compositions where these are appropriate to the site context, settlement pattern and landscape character. Buildings must define and positively address streets, routes and public spaces, creating coherent, well-enclosed and attractive street edges. Non-residential development dominated by individual buildings or parcels set behind surface-level car parks will not be supported where this would undermine streetscape quality and enclosure, active frontage, pedestrian movement, landscape quality or efficient use of land. Where appropriate to their function, streets, routes and public spaces must be enclosed by active frontages. Blank or inactive street-facing elevations	

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	and development dominated by surface parking, garages, fencing or walls must be avoided where they would undermine streetscape quality, natural surveillance or the public realm. Corner homes must be dual aspect, with habitable room windows overlooking both streets where practicable. v) Spacing and transitions. Spacing between buildings and transitions between existing and new development must be deliberate and well resolved, having regard to building height, typology, massing, amenity, local character and townscape or landscape context. Unnecessarily gappy layouts, including repeated narrow or residual spaces between detached or semi-detached dwellings that undermine local character, street enclosure, efficient use of land, energy efficiency, maintenance or landscape quality must be avoided. vi) Settlement edges and countryside integration. New settlement edges must be positive, outward-facing and well-integrated with both the existing settlement and the countryside, responding to landscape character, topography, field patterns, trees, hedgerows, views, routeways and wider green and blue infrastructure. Hard, defensive or poorly integrated backs of development must be avoided. Development within the High Weald National Landscape, or affecting its setting, must have regard, where relevant, to the High Weald AONB Housing Design Guide, or successor guidance.	
Policy LWL7: Streets and Public Realm for All	Development proposals that create, alter or affect streets, routes, public spaces or the public realm must create safe, inclusive, attractive, healthy and climate-resilient streets for all users. Proposals must meet the following criteria, with the level of detail required proportionate to the scale, nature and location of the development and the extent of works proposed. Low-speed street design New and improved streets must be designed to achieve low vehicle speeds, with a design speed of no more than 20mph where motor vehicles are	There are no LSEs of this policy on Habitats Sites. This is a strategic policy and although the proposal specifies a quantum of development there is no spatial allocation within the policy. There are no impact pathways present and the policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	present. A higher design speed will only be supported where clearly justified by the movement function and context of the route, including on strategic or primary movement routes, and where agreed with the Highway Authority. Speed reduction must be achieved primarily through the layout and character of the street. Signage must be used only where necessary and must avoid unnecessary street clutter. Inclusive, pedestrian-priority streets Streets must be designed in accordance with the movement hierarchy and relevant user hierarchies, prioritising pedestrians, followed by cyclists, public transport users and private motor vehicles. Streets and public spaces must be legible, attractive and accessible to people of all ages and abilities, including older people, disabled people and other people with mobility, sensory or cognitive impairments, and people living with dementia. They must support personal safety, comfort, social interaction and independent movement. Particular consideration should be given to the safety and perceived safety of women and girls and other groups who may feel vulnerable in public space. Shared-space or level-surface designs will only be supported where inclusive access, legibility and safety are demonstrated. Street enclosure and active edges Streets and public spaces must be positively defined by buildings, landscape, street trees, boundary treatments or other appropriate public realm features. Poorly defined edges and layouts dominated by parking or servicing must be avoided. Tree-lined streets, landscape, SuDS and green infrastructure Streets must be tree-lined where this is compatible with highway safety, accessibility, utilities and drainage. Trees must be selected and located to provide shade, cooling, biodiversity, carbon storage, visual amenity and	

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	climate resilience, with sufficient above- and below-ground space to establish and mature. Street trees and planting must be integrated with SuDS, lighting, utilities, parking, visibility requirements and street furniture from the outset. Long-term management, maintenance, funding and replacement arrangements must be secured where necessary. Streets must incorporate landscape, green infrastructure and sustainable drainage as integral design elements, in accordance with Policy ENV3. Where frontage parking is proposed, it must be broken up and softened by landscape, trees, planting, SuDS or other green relief so that parked vehicles do not dominate the street. Green relief must include at least one planted space or equivalent landscape feature broadly equivalent in frontage width to one adjoining parking bay for every four parking bays, unless a different design solution would achieve equal or greater street greening, tree planting, drainage, enclosure and visual quality. Social interaction, play and everyday public life Streets and public spaces must support social interaction, rest, informal play and everyday public life. Public realm features must be provided where appropriate to the scale, location and function of the street or space, and must be well located, accessible, inclusive, safe, durable and maintainable. Where play areas, seating areas or other community spaces are provided as part of the public realm, they must be safely and conveniently located, well overlooked, accessible to all users, and connected to direct active travel routes. Services, utilities, parking infrastructure and street clutter Services, utilities, lighting, signage, bin collection, cycle and e-cargo cycle infrastructure, electric vehicle charging infrastructure and related equipment must be planned from the outset as part of the street design, landscape strategy and public realm concept. These elements must be coordinated to	

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	avoid conflicts with trees, SuDS, active travel routes, accessibility, visibility, servicing, emergency access, landscape quality and future maintenance. Street clutter must be avoided. Public realm elements must be necessary, coordinated, well designed and consistent with the character and design concept for the street. Healthy streets Major development, and other development creating or significantly altering streets or public spaces, must demonstrate how the design has responded to relevant Healthy Streets indicators. Historic streets and public realm Development affecting historic streets, conservation areas, listed buildings or their settings must respond positively to heritage significance, local character and the historic public realm, in accordance with Policy HER1.	
Policy LWL8: Multimodal Parking, Servicing and Deliveries	All development must provide safe, convenient, inclusive and well-designed arrangements for cycle and vehicle parking, servicing and deliveries, proportionate to its nature, scale, location and likely demands. Provision must support sustainable travel, inclusive access, efficient use of land, local character and a high-quality public realm. The amount, type and allocation of vehicle and cycle parking, and the applicable technical requirements, must be determined having regard to the latest East Sussex County Council guidance on parking at new developments, or successor documents. Any departure must be supported by site-specific evidence. Requirements applying to all development <i>Parking and layout</i> Parking must be safe, convenient, inclusive, appropriately overlooked and integrated with buildings, streets, landscape, public spaces and active travel routes. Vehicles, hard surfacing and associated infrastructure must not	There are no LSEs of this policy on Habitats Sites. This is a strategic policy and although the proposal specifies a quantum of development there is no special allocation within the policy. There are no impact pathways present and the policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	dominate streets, frontages, entrances or public spaces or obstruct active travel routes. <i>On-street parking</i> Well-designed on-street parking is supported where it contributes positively to street enclosure, activity and natural surveillance. Where on-street parking is proposed or relied upon, it must be designed and assessed from the outset so that it supports convenient access, street activity and an attractive public realm without compromising active travel, visibility or essential vehicle access, or causing unacceptable displacement onto surrounding streets, footways, verges, landscaped areas or public spaces. <i>Cycle parking, accessible parking and inclusive access</i> Development must provide secure, covered, convenient and inclusive cycle parking in accordance with the latest East Sussex County Council and relevant national guidance. Cycle parking must be readily accessible from the street and destination served, integrated with the building or frontage, and make proportionate provision for larger, adapted, cargo and other non-standard cycles where relevant to the nature and scale of the development. Appropriate visitor and short-stay cycle parking must be provided where relevant. Accessible vehicle parking and drop-off facilities must be provided where required, having regard to the latest East Sussex County Council guidance, and connected to entrances by safe, direct and step-free routes. Where electric-vehicle charging is provided, accessible vehicle parking spaces must have appropriate access to charging provision. Where relevant, secure, convenient and appropriately covered storage and charging must also be provided for mobility scooters and powered wheelchairs. <i>Landscape, infrastructure and character</i> Parking and associated landscape and drainage must form an integral and multifunctional part of the development. Relevant landscape features, trees, planting, green infrastructure, permeable surfaces and sustainable drainage	

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	must be retained and integrated, and extensive hard surfacing, excessive engineering and visual clutter avoided. Communal, grouped and substantial parking areas must have suitable arrangements for establishment, management and long-term maintenance and must be designed to allow future adaptation where practicable. Large surface car parks must be subdivided by buildings, trees, substantial planting or drainage features, provide safe and accessible pedestrian routes and avoid visually prominent expanses of vehicles and hard surfacing. Where lighting is necessary, it must provide safe, inclusive and legible access while avoiding unnecessary illumination, glare and harm to residential amenity, biodiversity, heritage, landscape character and dark skies in accordance with Policy LAN4. Electric-vehicle charging equipment and associated infrastructure must be integrated with buildings, parking, landscape and movement routes and sensitively designed in rural, historic, landscape-sensitive and other sensitive locations. <i>Servicing, deliveries and parcel collection</i> Development must safely and conveniently accommodate servicing, loading, deliveries, refuse collection, removals and emergency access without causing unacceptable obstruction, danger, congestion or harm to residential amenity or the public realm. Flatted development, and non-residential or mixed-use development likely to generate significant delivery activity, must additionally make proportionate provision for secure parcel delivery and collection where necessary. Servicing and parcel facilities must be integrated with the layout and designed and managed to avoid obstruction, noise and disturbance. Additional requirements for residential development	

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	<i>Residential parking and storage</i> For houses with individual entrances, including terraces and town houses, at least one of the required cycle spaces must normally be provided at or immediately adjacent to the principal entrance and be directly accessible from the street. Additional cycle parking may be provided elsewhere within the plot where it remains secure and convenient to access. Garages and car ports must be integrated with the architecture of the building and the street and must not dominate or deactivate the street. Car ports must incorporate full height, visually permeable screen gates or an equivalent architecturally integrated treatment that screens parked vehicles while retaining the open character of the car port. Where garages or car ports also provide cycle, refuse or other storage, they must remain sufficiently sized and convenient for those uses when a vehicle is parked. Where planning permission is required, in-curtilage and frontage parking must not create broad or uninterrupted areas of hardstanding or allow vehicles to dominate the frontage. Forecourt parking in front of terraced housing and predominantly hard-surfaced front gardens will not be supported. Where frontage parking is proposed, meaningful planting, boundary treatment, pedestrian access and sustainable drainage must be retained or provided. Rear parking courts must be small-scale, convenient, safe, inclusive, well overlooked and landscape-led and must normally serve no more than five dwellings. A larger court will only be supported where justified by the development context and designed as a well-defined courtyard or mews enclosed and overlooked by active frontages and entrances. Large, isolated or poorly overlooked rear parking courts, including courts predominantly enclosed by rear garden boundaries, will not be supported. Other grouped or communal parking must be integrated with the layout, buildings and landscape and provide direct and convenient pedestrian access to the dwellings served.	

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
7. Health and Wellbeing		
Policy HWB1: Health Impact Assessments	HIA Screening A Health Impact Assessment (HIA) screening will be required for all applications related to major development located within wards that fall within the 20% most deprived nationally, according to the latest Index of Multiple Deprivation. This screening process will determine if an HIA is required and must be undertaken at an early stage in the design process to ensure that local health and wellbeing issues are identified early. HIA An HIA must be submitted with applications for development where an HIA screening has identified it as necessary in accordance with (1) above, or where development (including change of use) is equal to or exceeding: a. 100 dwellings (i.e. self-contained housing units); or b. 100 non-self contained bedspaces (such as care homes); or c. 2,000 sqm of non-residential floorspace; or d. A site of 5 hectares. Assessment requirement Where an HIA is required, either identified through the screening process or triggered by the thresholds above, it must: a. commence at the initial stages of the development, with its findings and recommendations incorporated into the submitted proposal; b. assess both the individual and cumulative impacts of the proposal; and c. be submitted with outline, full, and reserved matters applications, at a level of detail proportionate to the stage of the proposal.	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
Policy HWB2: Managing Impacts on Community Wellbeing	To manage the impact of development on community wellbeing, applications for new development or change of use that have the potential to adversely affect public health and wellbeing will be assessed against the following criteria: - The extent to which the proposal may harm local amenity through, for example, increased noise, odour, litter, traffic, anti-social behaviour; - Its impact on active frontages and the daytime/ evening function of the local area; - The existing concentration of similar uses within the locality and the potential for an over-concentration which could undermine local health and wellbeing objectives; - The extent to which the proposal would exacerbate existing public health challenges in the local area, having regard to the latest available evidence and data; and - The effectiveness of measures proposed to offset potential harm, as well as any demonstrable community benefits the use provides. Proposals will only be permitted where it is demonstrated that any potentially harmful impacts are avoided or satisfactorily mitigated. The opening times of hot food takeaways proposals may be restricted via planning condition on a case-by-case basis, where deemed reasonable and necessary to protect public health and amenity. Applications for hot food takeaways within Sidley District Centre will not be supported.	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.
Policy HWB3: Healthcare and Other Community Facilities and Services	To support Rother's settlements, address health inequalities, and ensure residents can "live well locally", the Council will protect existing healthcare and other community facilities and proactively support the delivery of new ones, including seeking proportionate contributions to relevant infrastructure identified in the IDP. Delivering new and improved facilities	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	Proposals for new, improved, or replacement community facilities and services to meet local needs will be supported where they: a. are located in accessible locations, reflecting the context of the settlement or catchment they serve; b. meet an identified local need, having regard to the IDP and latest relevant evidence (including the East Sussex Joint Strategic Needs Assessment), or otherwise contribute to the vitality and sustainability of the local community; and c. where reasonably practicable, facilitate the co-location and the creation of community hubs that can accommodate a broad a range of community activities. Provision on site allocations Residential-led or mixed-use site allocations are required to deliver on-site community facilities or infrastructure enhancement as specified in relevant site-specific policies. Protecting existing facilities Development that would result in the loss of sites or uses currently or last used as community and social facilities and services will not be permitted unless: a. alternative provision of the equivalent or better quality is available in the local area or will be provided and made available prior to the commencement of redevelopment of the proposed scheme; or b. it can be demonstrated there is no reasonable prospect of retention for the current use and that no other community use of the site is suitable or viable. The method for demonstrating compliance with part (b) is set out in Policy ECO4 (Retention of Sites of Economic or Community Value).	There are no impact pathways present and this policy is screened out from Appropriate Assessment.
Policy ENV13: Green and Blue Infrastructure	Green and blue infrastructure will be designated on the Local Plan's Policies Maps.	There are no LSEs of this policy on Habitats Sites.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	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. 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: 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. ii) Permitting proposals for the improvement of existing, or provision of new, green and blue infrastructure, in localities where deficits are identified. 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: 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); b. the Natural England Green Infrastructure Framework and its Principles and Standards; 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; 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.	This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. 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. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	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. 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 recreation activities that will benefit from waters within Rother which should be detailed in a cross-border management plan.	
Policy HWB7: Combe Valley Countryside Park	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). 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. Within the CVCP, proposals will only be acceptable where they: 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).	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for this strategic gap, it does not provide for any specific development. The Countryside Park has the potential to divert recreational activities away from sensitive Habitat Sites. There are no impact pathways present and this policy is screened out from Appropriate Assessment.
Strategic Infrastructure Requirements		
Policy INF1: Strategic Infrastructure Requirements	Infrastructure capacity and provision	There are no LSEs of this policy on Habitats Sites.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	Development must be supported by necessary infrastructure. Development proposals will be supported where there is sufficient infrastructure capacity; or where proportionate infrastructure improvements or contributions will be delivered or secured to mitigate the impacts arising from the development in a timely manner. Where a development proposal requires additional infrastructure capacity to be deemed acceptable, mitigation measures must be agreed with the Council and the appropriate infrastructure provider. Such measures may include (but are not limited to): Financial contributions towards new or expanded facilities and the maintenance thereof; On-site provision of new facilities; Off-site capacity improvement works; The provision of land; and The cost of transport impact monitoring. For major development proposals, developers and landowners are expected to engage early (including at the pre-application stage) with the Council, statutory consultees (including neighbouring authorities), town and parish councils and specific consultation bodies (including relevant infrastructure providers) to ensure that individual and cumulative impacts of development are considered and mitigated to an acceptable level at the appropriate time, in line with published policies, the Infrastructure Delivery Plan, and relevant guidance. Funding mechanisms Where a proposed development, either alone or cumulatively with other developments, generates infrastructure impacts or requirements, applicants will be required to make direct provision or contribute towards the delivery of the relevant infrastructure, including where this is set out in the Infrastructure Delivery Plan and other policies in this Plan, provided that	This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	such contributions are compliant with national policy and the legal tests (being necessary, directly related, and fairly and reasonably related in scale and kind to the development). Where necessary, legal agreements (such as Section 106 and Section 278 agreements) and planning conditions (including Travel Plan modal share monitoring targets) will be used to secure site-specific infrastructure, land, monitor and manage commitments, and financial contributions that are not secured via CIL. Exceptions Exceptions to full infrastructure mitigation will only be considered in exceptional circumstances where the applicant submits a fully transparent, open-book Viability Assessment which proves that full mitigation would make the development unviable. Where exceptions are accepted: Applications must demonstrate that any residual level of harm resulting from reduced infrastructure provision is mitigated to an acceptable level; and S106 agreements will be used to require viability review mechanisms and clawback clauses, for the purpose of securing additional infrastructure mitigation or financial contributions in the event that development viability improves prior to the completion of the development. Governance and delivery The Council will work in partnership with statutory consultees (including neighbouring authorities), specific consultation bodies (including relevant infrastructure providers), and relevant working groups (such as a Transport Infrastructure Management Group), to oversee the coordinated delivery, monitoring, and phasing of strategic infrastructure required to support the Local Plan.	

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
Policy INF2: Transport Connectivity, Decarbonisation & Mitigation	Sustainable patterns of movement 9. All development proposals should be located and designed to support sustainable patterns of movement, enable good accessibility for different users and make the most of existing and proposed transport infrastructure, in accordance with Policy LWL2, LWL3 and LWL4. Highway safety and network capacity 10. All development proposals should be capable of proceeding without having a severe adverse impact on the transport network (in terms of capacity and congestion, including cumulative impacts), or an unacceptable impact on highway safety, taking into account any mitigation measures proposed as well as any wider network improvements. 11. Applications meeting the thresholds and technical requirements set out by East Sussex County Council (the Local Highway Authority), National Highways and other relevant statutory consultees will be required to demonstrate compliance with criterion (2) via the submission of: a. A Transport Assessment or Transport Statement, which robustly addresses the vehicular, cumulative, and multi-modal impacts of the scheme, including engagement with National Highways where there is a likely material impact on the Strategic Road Network, and with neighbouring authorities (including Kent County Council) where there are potential cross-boundary impacts; and b. A Travel Plan, incorporating a comprehensive Monitor and Manage Strategy, setting out how sustainable travel targets across all modes will be implemented, monitored, and secured across the construction, build-out, and operational phases. Securing mitigation and funding 12. Where transport mitigation is required to make a development acceptable, planning conditions (including Travel Plan modal share monitoring targets) and legal agreements (including Section 106 and	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	Section 278 agreements) will be used to secure any monitor and manage commitments, site-specific infrastructure, necessary physical works, performance bonds, and commuted sums for long-term maintenance. 13. Where transport mitigation, whether addressing site-specific or cumulative impacts, is contingent on monitored performance, it will be managed through a Monitor and Manage framework to ensure measures are appropriately phased, triggered, and funded by developers proportionate to their impact. Where a Monitor and Manage strategy is approved and implemented, these conditions and agreements will require funding for traffic monitoring and may also require contributions into ring-fenced escrow accounts to secure contingency mitigation or interventions. 14. Strategic mitigation addressing district-wide traffic growth to facilitate development will be supported through CIL and external funding mechanisms.	
Housing		
Policy HOU1: Mixed and Balanced Communities	In order to support mixed, balanced and sustainable communities, housing developments will be considered in accordance with the following criteria: a) 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; b) 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). A higher percentage than 30% will be appropriate and required where the most up-to-date evidence demonstrates a higher need; c) Affordable housing shall be required in accordance with Policy HOU2. The exact mix of affordable housing sizes and types shall be identified through discussions with the Council. The starting point for discussions is that the majority of dwellings for	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	social or affordable rent 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; d) Developments comprised exclusively of affordable housing will be supported in principle, in locations which accord with the Live Well Locally policies including in relation to access to services and public transport; e) 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 provided, unless the particular characteristics of the proposal or site makes this inappropriate; f) 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 g) 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.	
Policy HOU2: Affordable Housing	Affordable housing will be sought on all qualifying housing development sites. 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 30% of the gross number of residential units on greenfield sites and 10% on brownfield sites must be provided as on-site affordable housing provision, unless off-site provision or an equivalent financial contribution in lieu can be robustly justified.	There are no LSEs of this policy on Habitats Sites. The is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	When considering sites that include a mix of both greenfield and brownfield land, a site will be considered greenfield land when at least 50% of the site is greenfield. Developments providing a level of affordable housing in excess of these minimum proportions will be considered favourably. Where a site-specific viability assessment, prepared by a suitably qualified professional, 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. This will be independently reviewed at the applicant's expense. Where the Council agrees an affordable housing level below the policy compliant percentages set out above, 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 construction of the development and initial sales period, to ensure that the maximum affordable housing contribution viable, up to the policy requirement, is provided. Affordable housing provided in accordance with criterion (2) above shall comprise the following tenure mix: a. 20% Social Rent; b. 50% Affordable Rented; and c. 30% Affordable Home Ownership. The different housing tenures to be provided on any 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. On mixed market/ affordable developments, the affordable housing shall be apportioned in small clusters across the whole site and where this is not proposed it should be robustly justified.	

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	In all cases, planning permission will be subject to a planning obligation to set out 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).	
Policy HOU3: Rural Exception Sites & Community-led Development	Rural Exception Sites Planning permission may be granted for small-scale residential development outside development boundaries in order to meet an identified local need for affordable housing in rural areas. Such development will be permitted where the following requirements are met: It helps to meet an identified local housing need for affordable housing (in terms of dwelling mix, type and tenure) as evidenced through a local housing needs survey or secondary data which is no more than five years old; The site is well related to an existing settlement and its services, in accordance with the Live Well Locally policies including access to public transport; The identified local housing need cannot reasonably be met within the settlement's development boundary (if it has one); and The development is acceptable in terms of its impacts on the character of the rural area, the settlement and the landscape, and meets other normal local planning criteria. In all cases, planning permission will be subject to a planning obligation to ensure that the affordable housing remains available to meet local housing needs in perpetuity, and that people with local connections are given highest priority in both initial and future occupancy. 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.	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	Community Led Development Community-led development, as defined in the NPPF, comprising small-scale residential development outside development boundaries, will be permitted where the proposal will secure clear benefits to the community, and is acceptable in terms of its impacts on the character of the rural area, the settlement and the landscape, and meets other normal local planning criteria.	
Policy HOU4: Sub-division of Dwellings, and Houses of Multiple Occupation (HMOs)	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: a. 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 (General Development Considerations); b. The proposal is appropriate in terms of the impacts on the amenities of occupants of nearby properties; c. Any alterations or extensions to the host building to facilitate the sub-division or conversion are in accordance with Policy HOU15 (Residential Extensions, Alterations & Outbuildings). d. Any conversion, alteration or extension works to the host building to facilitate the sub-division shall include measures which will improve energy efficiency and sustainable construction, in accordance with the policies of the Green to the Core chapter; e. Proposals involving the change of use of a non-residential use to a dwelling or HMO will be determined in accordance with Policy ECO4 (Retention of Sites of Economic or Community Value), as appropriate. f. 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	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	Standards and External Residential Amenity Areas including (and not limited to) in terms of provision for car and cycle parking and waste and recycling; Proposals for a new HMO will be required to comply with the following additional criteria: - The proposal contributes towards the provision of mixed and balanced communities and does not result in an over-concentration of HMOs in a particular area; - Planning applications are accompanied by a detailed management scheme to demonstrate how the HMO will be appropriately 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 planning obligation.	
Policy HOU5: Residential Internal Space Standards	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. 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.	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.
Policy HOU6: Access Standards	The Council adopts the Optional Buildings Regulations for Accessible and Adaptable Homes. All dwellings are required to meet M4(2): Category 2 - Accessible and Adaptable Dwellings. 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	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	adaptation of the dwelling to meet the needs of occupants who use wheelchairs). 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). Planning conditions will be imposed to secure the required provision. 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.	
Policy HOU7: Specialist Housing for Older People	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. 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 an identified local need for such housing in rural areas. Any such proposal must be well related to an existing settlement and its services including access to public transport, must safeguard intrinsic and distinctive landscape character, paying particular regard to the conservation of the High Weald National Landscape, and must meet other local planning criteria.	There are no LSEs of this policy on Habitats Sites. This is a management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	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. 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.	
Policy HOU8: Residential Care & Nursing Homes	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. 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 Proposals involving the loss of existing residential care homes, including through change of use, will be resisted unless: - it is demonstrated that sufficient provision of the equivalent or better quality is available in the local area; or - 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 - 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.	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
Policy HOU9: Gypsies, Travellers and Travelling Showpeople	Development proposals for new Gypsy, Traveller and Travelling Showpeople sites, and extensions, alterations and intensifications of existing sites, will be supported when all of the following criteria are met: - It contributes to meeting both current and projected needs for gypsy, traveller or travelling showpeople accommodation, as demonstrated in the most up-to-date Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment; - The site is of a small scale (circa maximum ten pitches/ plots) and is not disproportionate in scale to the nearest settlement; - It safeguards intrinsic and distinctive landscape character, paying particular regard to the conservation of the High Weald National Landscape in accordance with other Plan policies, including through restricting any permanent built structures and external lighting in rural locations to what is essential; - On sites containing multiple pitches/ plots it is demonstrated that as far as possible, built development such as hardstanding, parking areas and structures are shared between pitches, to minimise landscape impacts; - Other than for transit sites, the site is within or close to an existing settlement, from which residents can access education, health, welfare and employment infrastructure; - It is capable of being satisfactorily provided with necessary infrastructure such as power, water supply, foul water drainage and waste/recycling management; - It does not cause unacceptable harm to the amenities of neighbouring uses and occupiers; and is not subject to unacceptable harm to amenity from neighbouring uses; - In the case of sites for Travelling Showpeople, the site is also suitable for the storage of large items of mobile equipment; - In the case of transit sites, the site is located close to or within easy access of the strategic road network; - In the case of transit sites, the proposal is accompanied by a management plan which demonstrates how the site will be	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	appropriately managed in perpetuity to ensure the amenity of its occupants and the local community is protected. xi. Where planning permission is granted, appropriate conditions or planning obligations will be imposed to ensure occupation of the site is restricted to those persons falling into the definition of Gypsies, Travellers and Travelling Showpeople.	
Policy HOU10: Self-Build and Custom Housebuilding	The Council will support Self and Custom Housebuilding projects, including community-led projects, subject to compliance with other relevant Local Plan policies. 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 and will be secured by planning obligation. Plots should be made available at a demonstrably comparable market rate for the local area and marketed through relevant marketing agencies for a period of at least 12 months. If the plots are not sold within this time period, they may be released for conventional market housing in line with the terms set out in the relevant planning obligation. Where appropriate, the Council will seek to ensure that self/custom build homes are developed in accordance with an agreed design code. Proposals will also need to demonstrate the plot(s) have a suitable layout and design to enable them to be delivered and make optimum use of land. Planning conditions may be used to ensure appropriate phasing of development. The requirements of this policy do not apply where the site or proposed development: a. Provides solely for Build to Rent homes; b. Provides solely or predominately specialist accommodation for a group of people with specific needs (such as purpose-built accommodation for the elderly);	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	c. Is exclusively for affordable housing, a community-led development exception site or a rural exception site; d. Consists solely of the re-use or conversion of vacant buildings; or e. Consists solely of flats. The above exclusions do not preclude self and custom build housing being included on such schemes if proposed.	
Policy HOU11: New Dwellings in the Countryside	New dwellings in the countryside (as defined by being outside of a development boundary as defined on the Policies Map) will be allowed in very limited circumstances, including: a. Dwellings to support farming and other land-based industries, in accordance with Policy HOU12 (Dwellings for Rural Workers); b. The conversion of a historic building in accordance with Policy HER2 (Conversion & Re-use of Historic Buildings), or other heritage assets, where the development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of the heritage asset; c. The one-to-one replacement of an existing dwelling of similar landscape impact; d. As a 'rural exception site' to meet an identified local affordable housing need in accordance with Policy HOU3 (Rural Exception Sites & Community-led Development); e. As a site for specialist housing for older people, where allowed for to meet an identified need in accordance with Policy HOU7 (Specialist Housing for Older People); f. The conversion of an existing redundant or disused building which is capable of conversion without significant extension, where justified in accordance with other relevant Local Plan policies, where the proposal enhances its immediate setting and where the site accords with policies within the Live Well Locally chapter; g. Very small-scale development of single, pairs or small terraces of 3-4 dwellings (maximum), either within a settlement without a	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	development boundary or adjacent to an existing development boundary where all the following criteria are met: i. the site is adjacent to the edge of an otherwise built-up frontage; and ii. the site accords with policies within the Live Well Locally chapter; and iii. where the siting, scale and design of the development would support and not detract from the historic settlement pattern and character of the locality; and iv. where the location of the development would not extend beyond any highly legible visual and landscape termination to the existing settlement; and v. where the location of the development would not result in the coalescence of distinct settlements; and vi. where the development would not infill important green gaps through which the High Weald National Landscape is glimpsed and appreciated. vii. In all cases the proposal must safeguard the intrinsic and distinctive landscape character and scenic beauty of the countryside and pay particular regard to the conservation of the High Weald National Landscape (where relevant), other environmental designations and the 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. viii. To provide for local rural housing need, all new dwellings in the countryside which are permitted under this criterion (g) shall be subject to a restriction, secured by a planning condition or obligation, which limits their occupation to that of a principal 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 ECO7 and ECO8.	

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
Policy 12: Dwellings for Rural Workers	New dwellings to support farming and other land-based industries will be allowed in the countryside (as defined by being outside of a development boundary) where all of the following criteria are met: - The application demonstrates a clearly established functional need, relating to a full-time worker primarily employed in the farming and/or other land-based businesses. It must be demonstrated that the nature and demand of the work concerned make it essential for someone to live at, or very close to, their workplace.; - The application demonstrates the functional need cannot be fulfilled by other existing accommodation in the area; - The application demonstrates the unit and the agricultural/ land-based activity concerned are financially sound and have a clear prospect of remaining so; - Dwellings are of appropriate size, siting and design. Normally, accommodation will initially be permitted on a temporary basis for a period of three years in relation to a new rural enterprise. Both temporary and permanent dwellings will be subject to appropriate occupancy conditions. Proposals to remove an agricultural/ land-based work occupancy condition will only be permitted where it is demonstrated that: - There is unlikely to be any need for such rural worker dwellings at the site or within the local area, as demonstrated by an up-to-date assessment of the demand for land-based worker dwellings; and - Robust and comprehensive evidence has been provided to demonstrate that the property has been subject to continuous marketing for an 18-month period at either a rental or sale price that reflects the occupancy condition in place. Such proposals will be independently verified at the applicant's expense.	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
Policy HOU13: External Residential Amenity Areas	An integrated approach to the provision, layout and treatment of external areas of dwellings should be considered from the outset of the design process, with specific regard to the following: a. Private External Space: Appropriate and proportionate levels of private, usable, external space will be expected, having regard to the type, size and likely occupancy of the dwelling, the site context and the overall quality of the development. b. For new houses, private rear garden spaces of at least 10 metres (m) in depth will normally be required. A lesser depth may be acceptable where justified by the dwelling type, site layout, local character, heritage considerations or other site-specific circumstances, providing the space remains genuinely usable and the design secures satisfactory privacy, outlook, daylight and sunlight. c. New build flats and maisonettes will usually be required to provide a minimum of 3 square metres (sqm) of private external amenity space per dwelling. d. The siting and design of car parking, Electric Vehicle (EV) charging points, cycle storage, and storage for any other large item should be appropriate to the location, layout and design approach of the development, must not compromise the usability or quality of private or communal amenity space, and must accord with Policy LWL8 (Multimodal Parking, Services & Deliveries). Cycle storage must be safe, secure and conveniently located for the occupiers. e. Waste and Recycling: Sufficient bin storage and collection points must be provided. Their siting and design should be integral to the development, avoid harm to the visual amenity and streetscape character of the development and surrounding area, and be fully accessible for collection. Storage and collection arrangements must not obstruct pedestrian, wheeling or cycling routes or unacceptably reduce the usability of external amenity space.	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
Policy HOU14: Extensions to Residential Gardens in the Countryside	Extensions to the gardens of existing dwellings in the countryside will not be permitted unless the extension: i) is modest in area and the change of use and associated domestic paraphernalia does not harm the rural character of the area; and ii) is to a natural boundary or is a logical rounding off.	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.
Policy HOU15: Rural Extensions, Alterations and Outbuildings	Extensions, alterations and outbuildings to existing dwellings will be permitted where: 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 leave sufficient usable external private space for the occupiers of the dwelling in accordance with Policy HOU14; iv) They conserve and respond positively to the character, significance and setting of historic buildings, heritage assets and historic areas, where relevant; v) In the case of outbuildings, they are in close proximity and subservient to the host dwelling, respect and respond positively to the character, appearance and setting of the host dwelling within its plot and the wider street-scene, landscape or countryside context through their siting, scale, massing, design and appearance and materials. The cumulative impact of multiple outbuildings will be taken into account; vi) In the case of outbuildings, they are in close proximity and subservient to the host dwelling, respect and respond positively to the character, appearance and setting of the host dwelling within its plot and the wider street-scene, landscape or countryside context through their siting, scale, massing, design	There are no LSEs of this policy on Habitats Sites. This is a management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	and appearance and materials. The cumulative impact of multiple outbuildings will be taken into account; vii) In the case of rural workers dwellings, the development demonstrates how it would not undermine the long-term viability of the dwelling as a rural worker's dwelling.;	
Policy HOU16: Annexes	The creation of residential annexes will be considered in accordance with a sequential approach in the following order: 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. 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. 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.	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.
Policy HOU17: Boundary Treatments and Means of Enclosure	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: 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;	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	iii) Where fencing could be considered appropriate, it should be made of locally grown and/or coppiced material in accordance with Policy LWL5 (Well-designed & Distinctive Places); iv) The proposal is acceptable in terms of highway safety; v) The design has taken account of the potential effects on wildlife and ecological networks and corridors.	
Policy HOU18: Access and Drives	Proposals for new drives and accesses will be supported where: They are acceptable in terms of highway safety, including for people using active travel; By virtue of their location, design and materials (including any soft landscaping) they would maintain the character of the locality, including in the rural areas; They involve the relocation of an existing access, if there are highway safety reasons for relocating the existing access, and the stopping up of this existing access; and Either, they are constructed of permeable materials, or appropriate drainage is included to manage surface water run-off in accordance with Policy ENV3 (Sustainable Surface Water Drainage). Loose driveway surfaces are resisted for highway safety reasons.	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.
Economy		
Policy ECO1: Supporting a Thriving Economy	The Council will promote and help to facilitate sustainable economic development to support a thriving local economy. It will seek to create the right conditions for businesses to start-up, grow and adapt, as well as to ensure that local communities benefit from access to a wide range of good quality jobs, education and training opportunities. This will be achieved by: a. Safeguarding land for a range of employment uses to meet identified needs, and directing new employment development to these locations, together with supporting the renewal of employment land and sites, to help retain and attract businesses, in line with Policies ECO3 (Safeguarding	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	Employment Land & Premises) and ECO4 (Retention of Sites of Economic or Community Value). b. Ensuring the district's main commercial centres at Bexhill, Rye, Rye Harbour and Battle remain a focus for economic activity. c. Supporting the long-term vitality and viability of the district's town and district centres along with villages, recognising their role as focal points for commercial, leisure, community and cultural activity, and resisting inappropriate out-of-centre development for new main town centres uses, in line with Policy ECO6 (Supporting Town & Village Vitality). d. Building on Rother's strengths as an important visitor and leisure destination by growing the visitor economy in accordance with Policy ECO7 (Tourism Activities, Facilities & Accommodation), including opportunities presented by the district's cultural and heritage assets, coastal areas, the High Weald National Landscape and other environmental assets. e. Supporting rural economic activities and diversification, and appropriate development associated with these activities, including for agricultural, equestrian and other land-based rural business uses. f. Supporting proposals for low cost and affordable workspace in appropriate locations. g. Working with stakeholders to coordinate the delivery of new and improved infrastructure (including transport infrastructure) to enable and enhance access to key employment and commercial areas as well as education and training facilities, both within and beyond the district. h. Supporting the improvement of digital infrastructure across the district to meet the requirements of modern business and to enable flexible working practices. i. Supporting the transition to a green economy and encouraging new employment development to contribute positively to climate change	

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	resilience, including by applying circular economy principles and achieving zero carbon solutions. j. Seeking opportunities for education, workplace training, apprenticeships and other skills development including by securing planning contributions, where appropriate in accordance with Policy ECO12 (Local Employment & Skills). k. Cooperating with neighbouring authorities and other key stakeholders to support economic growth and investment across East Sussex.	
Policy ECO2: New Employment Development	Development proposals for new employment development (Class E(g), B2, B8 and associated Sui Generis uses) will be supported where they are appropriately located, including by being of a scale and nature that is suitable to the site and locality. Priority should be given to locating new employment uses within: a. Established employment areas (including through sensitive expansion of existing sites); b. In locations where provision has been made for these uses in site allocations; and c. In other areas or sites that are within or well connected to settlements and the services and facilities necessary to support the employment use. Appropriate employment development in the countryside will be supported in line with Policy SS4 (Strategy for the Countryside), including through the sensitive, normally small-scale growth of existing business sites and premises, and by the conversion, for employment use, of farm or other rural buildings in accordance with Policy ECO9 (Agricultural Development & Forestry). All new employment development must be of a high-quality design and not have unacceptable adverse impacts on local amenity, the environment and the highway network. Development proposals must ensure that transport,	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	access and parking requirements and impacts have been fully considered and assessed, in line with other Local Plan policies. Development proposals should seek opportunities to ensure site layouts, buildings and spaces are designed to be flexible and/or adaptable to a wide range of employment uses and occupiers over their lifespan, and to make provision for connections to high-speed broadband. Development proposals involving the renewal and regeneration of employment land/floorspace (including alterations to buildings, the reconfiguration of sites, as well as the sensitive expansion of employment sites) to enhance its suitability and attractiveness for business use will be supported in principle.	
Policy ECO3: Safeguarding Employment Land & Premises	Employment land and floorspace that is allocated for employment use, is currently in employment use, and/or which was last authorised for employment use will be safeguarded to meet Rother's identified employment needs. Development proposals involving the loss of employment land/floorspace should be avoided. They will only be acceptable where it is clearly demonstrated that there is no reasonable prospect of the land/floorspace being retained solely in employment use and the proposal meets the tests set out in Policy ECO4. Where (2) above applies, development proposals for complementary enabling mixed-use development (including a component of employment land/floorspace), should be explored in the first instance. In such cases, the non-employment component should be the minimum amount required to make the employment use(s) viable, as demonstrated through a Viability Assessment. Where it is suitably demonstrated that the continued use of employment land/floorspace is not viable through an enabling mixed-use scheme, development proposals will be expected to consider alternative uses in the following order of priority:	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	a. Appropriately located main town centre uses, having regard to Policy ECO6 (Supporting Town & Village Vitality); b. Community uses; c. 100% affordable housing; d. Residential uses. Development proposals for the change of use from class E(g)(i) and E(g)(ii) to class B2 and B8 uses will be supported where they are appropriately located and designed, in particular in terms of their impact on residential amenity.	
Policy ECO4: Retention of Sites of Economic or Community Value	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: 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. 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. *This includes a community facility, public house, local shops, tourist accommodation or attractions, and an employment use.	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
Policy ECO5: Temporary Uses	Proposals for the temporary use of vacant or underutilised buildings, structures, and cleared land for economic, commercial, community, cultural, or social purposes will be permitted provided they comply with the following criteria: a. The temporary use, including any associated temporary structures, is suitable for its location and will not prejudice or delay the long-term delivery of the Local Plan development strategy, any site allocation requirements, or the site's allocated or permitted permanent use; b. Any physical alterations to existing buildings or the introduction of temporary structures, such as modular containers, must be capable of being reinstated to their original or agreed state if required (as per Criteria 3(b). below), and must not compromise the safe functioning of surrounding infrastructure; c. The site provides an acceptable level of amenity for its occupiers, and the operational impacts of the temporary use - including noise, odour, dust, light pollution, litter, anti-social behaviour, and hours of operation - will not cause unacceptable harm to the amenity of neighbouring properties, or the character of the locality. Particular support will be given to suitable temporary uses in designated town and district centres, on stalled development sites, and on future phases of allocated sites that remain inactive. Where planning permission is granted for a temporary use, the Council will secure conditions to: a. Limit the permission to a specified, time-bound period appropriate to the site circumstances and long-term development trajectory; b. Require the cessation of the use, the complete removal of all associated temporary structures/infrastructure, and the full reinstatement of the land or building to its prior condition (or a condition agreed with the Council) upon the expiration of the temporary permission.	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development or locations where this might occur. Significant effects are also more likely to arise from long-term permanent development rather than from temporary use. This policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
Policy ECO6: Supporting Town and Village Vitality	The long-term vitality and viability of the district's Town and District Centres will be achieved by reinforcing and enhancing their role as focal points of community, cultural and commercial activity, including by supporting their evolution as vibrant, adaptable and resilient mixed-use areas. The locally distinctive character of the district's rural villages will be protected, while ensuring thriving and viable rural communities through supporting high-quality sustainable economic growth and the retention of community facilities. Development proposals should contribute positively to the vitality and viability of town centres and villages, and support the Live Well Locally priority and policies, including by: - Ensuring a wide range and complementary mix of uses, including residential uses where appropriate; - Making provision for high-quality public realm that enhances the attractiveness of centres and improves accessibility to and within them, particularly by active travel; and - Taking opportunities to bring vacant land, buildings and units into active use, including through appropriate temporary uses in line with Policy ECO5 (Temporary Uses). - Retaining and improving provision of shops and facilities that meet the day-to-day needs of local communities. Town centre hierarchy and the sequential test Main town centre uses involving new development should be located within the identified Town and District Centres; then, if this is not feasible, in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered. The hierarchy of centres is as follows: Town Centres - Bexhill Town Centre - Rye Town Centre - Battle Town Centre	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	District Centres g. Sidley District Centre h. Little Common District Centre Primary Shopping Areas Primary Shopping Areas, as defined on the Policies Map, will be maintained as the main focus for retail uses and development within Town Centres. Retail and leisure impact assessments Development proposals for main town centre uses located outside of designated Town and District Centres will be required to satisfy the sequential test and submit an impact assessment, in line with national planning policy and the local threshold for assessments set out in (7) below. The impact assessment must demonstrate that the proposals will not have a significant adverse impact on the centres, or planned investment within them. Impact Assessments must be submitted for proposals that comprise 280 square metres or more gross retail floorspace outside of a Primary Shopping Area, or 280 square metres gross leisure floorspace outside of a Town or District Centre. Local provision for day-to-day needs The policy does not preclude the provision of small-scale, local shops outside of designated town and district centres where they serve the day-to-day needs of local communities in accordance with Policy HWB3, including rural communities in accordance with SS4. Such proposals will still be subject to the sequential and (where relevant) impact tests, in order to demonstrate that they are serving an immediate local catchment. The sequential test does not apply to applications for small scale rural offices or other small scale rural development.	
Policy ECO7: Tourism Activities, Facilities and Accommodation	Development proposals relating to tourism activities, facilities and accommodation will be supported where they:	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	a. Provide for the enhancement of existing attractions or accommodation to meet customer expectations; b. Support enjoyment of the district's Green and Blue Infrastructure (GBI) network, including active use along the coast, consistent with environmental and amenity factors; c. Promote the development of markets for local produce, particularly that which supports land-based industries and cultural assets; d. Increase the supply of quality serviced and self-catering accommodation; e. Demonstrate that due regard has been given to accessibility by public and sustainable transport; and f. If development is located in the countryside, it is of an appropriate scale and does not adversely impact on the landscape character and it accords with other relevant Local Plan policies including ECO2 (New Employment Development) and ECO9 (Agricultural Development & Forestry). Land or premises currently (or last) in use for tourism activity or as a tourist attraction, or visitor accommodation, must be retained in such use unless it is demonstrated that there is no reasonable prospect of its continued use for tourism purposes. The approach to demonstrating if there is no reasonable prospect of continued use is set out in Policy ECO4 (Retention of Sites of Economic or Community Value). For visitor accommodation, appropriate controls will be put in place that restrict occupancy to that for holiday/leisure purposes, whilst not unduly restricting operators from extending their season (subject to other Local Plan considerations). Proposals for holiday accommodation that result in the loss of a dwelling will be considered on a case-by-case basis, having regard to the desirability of retaining the dwelling, the suitability of the site for tourism use, and the economic benefits of the proposal. Within Rye, Rye Foreign, Icklesham and	proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	Camber parishes, proposals for holiday accommodation that result in the loss of a dwelling will not be supported. Proposals within the strategy area of the Dungeness Complex Sustainable Access and Recreation Management Strategy (SARMS) must comply with Policy ENV11 (Sustainable Access and Recreation Management Strategy).	
Policy ECO8: Holiday Sites and Accommodation	All proposals for new holiday accommodation must be appropriately located and designed, in line with other Local Plan policies. Proposals for new enterprises must be supported by a business case to demonstrate the proposed use will be viable. Proposals for static caravan, chalet or holiday lodge accommodation must also: a) Be of a modest scale for low-key, high-quality accommodation that requires only limited ancillary facilities; or b) Comprise a limited amount of accommodation to enhance an existing countryside recreational use and be wholly ancillary to that use; or c) Where within an existing site, either: i. Result in a demonstrable improvement to the appearance and quality of accommodation of that site, or ii. Be a limited extension of that site to a natural boundary and make a demonstrable improvement to the overall appearance and quality of accommodation. 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. For all proposals, in order to prevent the residential use of holiday accommodation, their use will be restricted to holiday/leisure purposes and will be subject to occupancy conditions relevant to the site.	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
Policy ECO9: Agriculture Development and Forestry	Development proposals for, or directly associated with, agriculture and forestry (including new buildings, operational facilities and the conversion, replacement or extension of existing sites and premises) must be necessary to support the agricultural/forestry uses on site. Where (1) above is satisfied, proposals will be supported subject to other Plan policies and where the siting, design and materials of the development respond positively to the local landscape character and: a. Wherever possible, they re-use or are within the footprint of an existing agricultural/forestry building, or are otherwise well-related physically and functionally to existing buildings associated with the agricultural or forestry activity, unless it can be demonstrated that there are circumstances that require an alternative or more isolated location; b. Opportunities are taken to remove existing redundant buildings within the application site, where this would enhance landscape character. New Agricultural Tracks Development proposals for new or improved access tracks for agriculture or forestry will be supported where: a. They are essential for the sustainable management of the land; b. It has been demonstrated that it is not feasible to use existing access tracks; c. They are the minimum scale and extent necessary; d. The layout and design conserves and where possible enhances local landscape character, which includes using landscape-appropriate surface materials, being in accordance with local geology and fitting within the pattern of existing contours and vegetation; e. They protect and enhance drainage patterns; and	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	Where practicable and appropriate, 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.	
Policy ECO10: Agriculture Diversification	Development proposals involving the diversification of agricultural and other land-based rural business activities will be supported where they: - Are located within an active enterprise; - Demonstrate how the scheme will support and add value to the existing enterprise. Where appropriate, permission for diversification schemes will be subject to a condition tying the new enterprise to the existing business; - Are ancillary and subordinate in scale to the farm or land-based business; - Do not cause severance or disruption to an agricultural holding; - Make use of redundant buildings before proposing new buildings. Where new buildings are proposed, these should be clustered within or otherwise adjacent to existing building groups, having regard to the historic development of the original enterprise and any heritage or landscape constraints; - Are of an appropriate scale and will not adversely impact on the character of the landscape, as well as local amenity and tranquillity; - Demonstrate that due regard has been given to accessibility by public and sustainable transport where possible and that traffic generation can be satisfactorily accommodated on the local road network, ensuring access arrangements are acceptable. Proposals for holiday accommodation as a form of diversification will be supported where they are provided through the conversion of a suitable redundant building. If the proposal involves the conversion of a traditional historic farm building, it will need to accord with Policy HER2 (Conversion and Re-use of Historic Buildings). Proposals for new build or other forms of holiday accommodation within existing rural enterprises also be assessed against Policies ECO5 and ECO6 of this chapter.	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
Policy EC11: Equestrian Developments	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. In addition, proposals should accord with the following criteria, as applicable: - Clearly demonstrate that the proposal is for, or directly associated with, an equestrian use and provide sufficient information to justify the nature of the proposal in relation to the existing and/or proposed equestrian activities; - The siting, scale and design, including materials and boundary treatment, of any new buildings or facilities should be appropriate to their context and rural setting; - Proposals should not be sited in particularly prominent or isolated locations where new development would not be appropriate; - 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; - Commercial riding schools, livery stables and related facilities should be satisfactorily integrated with existing buildings; - 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 - 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	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	network without the use of unsuitable roads and in all cases not adversely impact on road safety. 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. Permission may also be subject to the removal of excessive or inappropriate fencing which has already taken place.	
Policy ECO12: Local Employment & Skills	Development proposals are encouraged to source local businesses, recruit local workers and provide workplace training, skills development, and apprenticeships during the planning, construction and operational phases of development. Development proposals of 20 or more gross dwellings or 1,000 square metres or more gross non-residential floorspace , will be required to produce a Local Employment and Skills Plan (LESP) and make a planning contribution to the Council for the costs associated with the implementation and monitoring of the LESP, as follows: a. £200 per dwelling; b. £2 for every sqm of non-residential floorspace. Planning contributions based on the figures set out in (2) above will be index linked, starting from the date of the adoption of the Local Plan.	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this proposed policy is screened out from Appropriate Assessment.
Policy LAN1: Landscape Character & Stewardship	Management of the high quality historic, built and natural landscape character is to be achieved by ensuring the protection, and wherever possible enhancement, of the district's nationally designated and locally distinctive landscapes and landscape features. 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.	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	Development proposals within the High Weald National Landscape, another locally distinctive landscape, or which are otherwise sensitively sited (such as on the edges of settlements) should be informed by a Landscape and Visual Impact Assessment, appropriate and proportionate to the nature and scale of the development. The following nationally designated and locally distinctive landscapes and landscape features are identified: a. The High Weald National Landscape (see also Policy LAN2). b. The Romney Marshes, comprising the distinctive low-lying levels to the east of the district with particular regard to the landscape setting of Rye and Winchelsea. c. The Pevensey Levels, comprising of the low-lying area of wetland meadows between Bexhill-on-Sea and Hailsham in Wealden District. d. Nationally designated historic sites including listed Parks and Gardens, Scheduled Ancient Monuments and the Registered Historic Battlefield at Battle. e. The undeveloped coast. f. Open landscape between clearly defined settlements, including the visual character of settlements, settlement edges and their rural fringes. g. Ancient Woodlands. h. Tranquil and remote areas, including areas of dark night sky (see also Policy LAN3). i) 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.	
Policy LAN2: High Weald National Landscape	Development proposals within or affecting the setting of the High Weald National Landscape 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 core character	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	components, as set out in the latest version of the High Weald AONB Management Plan. The scale and extent of development within the High Weald National Landscape should be limited, 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 latest version of the High Weald AONB Housing Design Guide and Colour Study. Planning permission will be refused for major development in the National Landscape other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest. Planning applications for major development will be considered against the relevant criteria set out in the National Planning Policy Framework. Surviving evidence of the past of the High Weald shall be conserved and enhanced, for example, the remains of ancient fortification; assarts, mediaeval field systems, droveways and other traces of historic agriculture and the iron industry.	proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.
Policy LAN3: Trees, Woodlands and Hedgerows	Development proposals must, wherever possible, enhance and expand the district's tree, hedgerow and woodland resources. For all development proposals affecting or potentially affecting trees, hedgerows or woodland, the following criteria must be met: Protection of existing trees, hedgerows and woodlands - Consideration must be given to existing trees, hedges and woodlands located on and adjacent to the site, with a view to retaining, protecting and enhancing them as far as possible as part of the development, aligned to the well-being benefits of green infrastructure and having regard to the support of Rother District Council for the Rights of Trees . - Where developments are likely to affect existing trees, the Council will require the submission of a proportionate level of information with the planning application to demonstrate that criterion (1) has	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	been met. This could include a Tree Survey/Arboriculture Impact Assessment, Tree Protection Plan, and Method Statement in accordance with the latest British Standard (BS5837:2012). c. Development which will result in damage to or loss of trees of amenity, historic, or high ecological value will be strongly resisted, unless: i. The tree is demonstrated to be dead, dying, or pose an unacceptable risk to public safety; or ii. The tree is causing structural damage to nearby buildings or infrastructure that cannot be mitigated by any other means; or iii. The public benefits of the development clearly and demonstrably outweigh the loss of the tree(s). d. Trees with Tree Preservation Orders (TPOs) enjoy the highest level of protection. Impacts will only be accepted in exceptional circumstances where robustly justified and in line with legislation. e. Development which will result in the loss of a hedgerow will be strongly resisted unless this is justified and any necessary loss is demonstrated to be minimised as far as possible. f. A minimum buffer of 15 metres will be required between the edge of development and designated ancient woodland or other priority habitat woodland. It must be demonstrated that any buffer is suitable to minimise impacts throughout the life of the proposal. Where assessment shows other adverse impacts are likely to extend beyond this distance during or following works, the proposal is likely to need a larger buffer zone. For ancient or veteran trees as well as any tree with a TPO, the buffer zone should be at least 15 times larger than the diameter of the tree at 1.5 metres height above ground, or at least 5 metres from the edge of the canopy, whichever is greater. g. Development layouts must ensure that both retained and newly planted trees have sufficient space to grow and mature. Proposals must avoid positioning buildings, windows, or private amenity	

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	spaces where they will suffer obstruction or falling branches, which would result in future pressure to heavily prune or fell the trees. h. Adequate working space and Root Protection Areas (RPA) must be safeguarded. Encroachment into the RPA will only be permitted where it is strictly necessary, fully justified, and agreed with the Council prior to work commencing using sensitive construction techniques. i. Tree surgery work must be undertaken in accordance with the latest British Standard (BS3998:2010). New tree planting All new streets must be tree-lined in accordance with Policy LWL7 unless there are clear, justifiable, and compelling reasons why this would be inappropriate in specific streets. Landscaping schemes, where necessary as part of a development, should take account of the local landscape character, take any opportunities to link to existing green infrastructure networks, and provide ecological enhancements in line with the Local Nature Recovery Strategy. Soft landscaping details should include new tree, hedge and woodland planting. In selecting species for their planting scheme, applicants must: a. Select species suitable for the site conditions, soil type, intended functions, design effects and the surrounding structures and landscape; b. Prioritise native species and ensure species diversity to create a treescape resilient to pests, diseases, and climate change; c. Provide adequate below-ground soil volumes and planting pits to ensure long-term survival, while avoiding conflict with street lighting, highways infrastructure, underground utilities and access for maintenance; d. Consider the provision of shade to mitigate the effects of climate change.	

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	Replacement trees and canopy cover Where the loss of existing trees or hedgerows is unavoidably justified to facilitate development, adequate replacement provision will be required, which utilise local and native species appropriate to the character of the locality and the site. The Council will require the submission of a CAVAT assessment with any proposals to remove a tree of amenity, historic, or high ecological value. The lost canopy area must be adequately compensated in accordance with the findings of the CAVAT assessment. Replacement planting should aim to provide an equivalent or greater canopy cover at maturity, delivered on-site where possible, or via off-site contributions where on-site provision is unfeasible. Management and maintenance Proposals involving new tree, hedge and woodland planting must be accompanied by a management and maintenance plan (this may be achieved through a Biodiversity Gain Plan). The Council will secure planning conditions or obligations requiring the replacement of any trees or hedgerows that die, or fail to establish, or are removed within five years of planting.	
Policy LAN4: Light pollution and Dark Skies	In all areas of the district, development proposals must avoid unnecessary light pollution. The siting, layout and design of development must maintain and reinforce the sense of tranquillity of remote areas, especially locations within the High Weald National Landscape, through maintaining dark skies. Development proposals 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. Large areas of glazing in new building designs, especially wrap-around glazing and floor to ceiling windows, will not be permitted, especially in rural areas with intrinsically dark skies, unless it is demonstrated the proposal will have no adverse effects in terms of light pollution and affecting dark skies.	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	Development proposals within the High Weald National Landscape or its setting must have regard to the HWNL Unit's "Planning Technical Advice Note: Dark Skies in the High Weald". Artificial lighting proposals must: - 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. - Demonstrate that they have taken all opportunities to reduce light pollution. - Seek to protect light-sensitive species, wildlife-rich sites and habitats such as ancient woodland from impacts 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. - 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. - Avoid unnecessary street lighting and ensure any street lighting required is kept to the minimum necessary and adheres to best practice in terms of location, illuminance and equipment design and light temperature, to avoid unnecessary skyglow and light spill. Proposals for new or improved streets, crossings, public spaces and walking, wheeling and cycling routes must assess the need for lighting having regard to their function, anticipated hours of use, highway and personal safety, inclusive access, natural surveillance, existing ambient lighting, biodiversity, landscape character and impact on dark skies.	
Environmental Management		

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
Policy ENV1: Flood Risk Management	Flood risk from all sources will be reduced, managed and where necessary, appropriately mitigated by: - Locating new development to minimise the risk of flooding in accordance with the Sequential and Exception tests set out in national planning policy; - Locating and designing new development to account for increased flood risks from all sources, making an allowance for climate change, as identified in the Rother Strategic Flood Risk Assessment (SFRA) 2026, and subsequent updates; - Mitigating any residual flood risk through avoidance, design and implementation of SuDS principles in accordance with Policy ENV3 (Sustainable Surface Water Drainage), including Working with Natural Processes (WwNP) or Natural Flood Management (NFM), unless it can be demonstrated that this is not feasible; - Ensuring that new development does not materially increase the flood risk to other areas and incorporates appropriate surface water drainage measures to minimise its own risk of flooding, ensuring existing flood flow paths are taken into consideration; - Ensuring that new development does not compromise existing water management or flood infrastructure or the drainage schemes of other sites which already have planning permission; - Ensuring that any proposed flood prevention measures have full regard to sensitive areas designated for nature conservation and biodiversity.	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.
Policy ENV2: Protection of Water Quality and the Water Environment	The water environment will be protected and enhanced in line with the objectives of the Water Framework Directive. This will be achieved by: Requiring development proposals which could affect the water environment to identify and incorporate opportunities to support the objectives of the South East River Basin District (RBD) River Basin Management Plan and the East Sussex and Brighton & Hove Local Nature Recovery Strategy in relation to water quality, aligned to the well-being benefits of blue infrastructure;	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	b. Only permitting development in Groundwater Source Protection Zones (SPZs) where it can be demonstrated that there will be no adverse impact on the quality and resource of the groundwater; c. Ensuring the provision of adequate protection zones and undeveloped buffers to watercourses, demonstrating that the buffer is suitable to retain the natural function of the watercourse and its biodiversity; d. Ensuring that appropriate infrastructure for sewerage is available to meet the needs of proposed development, in accordance with Policy ENV4 (Foul Water Drainage); e. Ensuring that development proposals take opportunities to naturalise watercourse channels, improve biodiversity and ecological connections of watercourses where possible, incorporated through green and blue infrastructure; f. Wherever possible, avoiding negative impacts from diffuse agricultural and urban pollution; g. Wherever possible, avoiding altering natural flow of waterways; h. Having regard to the support of Rother District Council for the Rights of Rivers in planning decisions.	
Policy ENV3: Sustainable Surface Water Drainage	For all development proposals which could affect drainage on or around the development site, developers must demonstrate that sustainable drainage (SuDS) is an integral part of the design of the proposed development from the outset. Development proposals must be accompanied by details of the proposed sustainable drainage scheme and a Drainage Strategy, based on evidence of an assessment of site and wider catchment conditions and, reflecting the drainage hierarchy, best practice and relevant local and national guidance . The Drainage Strategy must demonstrate how surface water management has informed the site layout, levels, landscaping, and green and blue	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	infrastructure and how the four pillars of SuDS — water quantity, water quality, biodiversity and amenity — have been addressed. Development proposals will be required to demonstrate that development: a. On greenfield sites, does not increase greenfield run off rates or the vulnerability of the site or the wider catchment, to flooding from surface water run-off from existing or predicted water flows; b. On brownfield sites, does not increase the run-off more than the rate prior to any new development, as agreed in conjunction with the Lead Local Flood Authority (LLFA); c. Has no adverse effects on the water environment of the Pevensey Levels SAC/Ramsar and the Dungeness, Romney Marsh and Rye Bay SPA/ Ramsar. d. Wherever possible, has a positive impact on the risk of surface water flooding on the site and in the surrounding area adjacent to the development; e. Mitigates the potential impact of infiltration upon groundwater Source Protection Zones and/or Critical Drainage Catchments; f. Does not include infiltration drainage SuDs features that drain into land affected by contamination, Made Ground , or within a coastal zone within 50 metres of the cliff face at Fairlight Cove, as shown on the Policies Map; g. Ensures all surface water will pass through at least two treatment stages. For development in the hydrological catchment of the Pevensey Levels, a minimum of three stages of treatment will be required; h. Safely accommodates exceedance flows and surface water flow routes within the development site, without increasing flood risk elsewhere, and integrates them with the site layout, landscaping and green and blue infrastructure where appropriate; i. Secures appropriate arrangements for the management and maintenance of sustainable drainage infrastructure for the lifetime of the development.	

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
Policy ENV4: Foul Water Drainage	The provision of appropriate infrastructure for sewerage will be required to meet the needs of development, in accordance with Policy INF1 (Strategic Infrastructure Requirements). Development proposals must: a. Follow the drainage hierarchy; b. Ensure that foul and surface water flows are separated, and that the design of the wastewater disposal system will be safe and effective over the lifetime of the development; c. Ensure that any development proposing to discharge to a package treatment plant is compliant with the Environment Agency's General Binding Rules. Within the catchment areas for the Dungeness, Romney Marsh and Rye Bay SPA/ Ramsar site and the Pevensey Levels SAC/Ramsar site, it must be demonstrated: a. Via agreement by the wastewater provider, that modelling demonstrates that there is sufficient capacity within the relevant wastewater treatment works for the proposed development to be accommodated without a negative effect on the receiving environment; or b. That the development can be delivered without a negative water quality effect on the Habitats Sites in accordance with the Habitats Regulations. Details of the means by which any necessary protection measures will be secured for the lifetime of the development will be required as part of any application.	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.
Policy ENV5: Ground Conditions	Development proposals that comprise or include land that is known or suspected to be affected by land contamination or land instability (including coastal margins) must establish the full nature and extent of the ground condition issues through the submission of a ground conditions report prepared by a suitably qualified professional. This must include	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	consideration of the effects on sensitive receptors both on-site and in the wider area, and potential impacts of climate change. Where a scheme of remedial work is required to make the ground conditions safe for the proposed use, a Remediation Strategy must be prepared and implemented by the developer which demonstrates that the proposed development; a. Will not exacerbate any ground condition issues on site or in the nearby surrounding area; b. Can tolerate the ground conditions for the lifetime of the use without causing adverse impacts; c. Can appropriately manage surface water run-off within the site in accordance with Policy ENV3. Relevant monitoring, management and/ or maintenance of the measures identified in the Remediation Strategy will be secured as part of the development. Where insufficient information is provided to determine the effect of development on ground conditions, or the relevant reports indicate that there will be an unacceptable adverse impact which cannot be adequately prevented, avoided, and/or mitigated through appropriate remedial measures, planning permission will be refused.	proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.
Policy ENV6: Rother Coastal Change Management Area	Within the Rother Coastal Change Management Area (CCMA), as defined on the Policies Map, proposals for new permanent residential development, including those involving the conversion or replacement of existing buildings, will not be permitted. Other forms of development within the CCMA will only be considered acceptable if a Coastal Vulnerability Assessment (CVA), which is proportionate to the scale and type of development, is submitted with the application and demonstrates that: a. The proposal comprises essential infrastructure including coastal protection schemes; or	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	b. The proposal comprises commercial, tourism/ leisure or community development which provides wider sustainability benefits; and c. The works are consistent with the relevant Shoreline Management Plan (SMP) and that there will be no adverse impact on the local environment, natural coastal processes or accelerate the rate of coastal change elsewhere; d. The character of the coast and any relevant designations would not be compromised; e. It will not result in an increased risk to life or property over its planned lifetime; f. The proposal 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 in accordance with the Marine and Coastal Access Act 2009. Development proposals permitted within the CCMA may be subject to a time-limited permission and restoration conditions to ensure alignment with long-term costal change. Applications for the relocation of development to a new location outside of the CCMA will be supported provided: a. The existing development is lawful; b. The existing development is demonstrated to be at risk of loss within the next 20 years (short term); c. The type and scale of development and its proposed location is consistent with other policies within this plan; and d. A clear plan for restoration of the original site to a natural or semi-natural condition, including the removal of built structures, materials and services, is submitted with the application and agreed with the Environment Agency.	
Policy ENV7: Biodiversity	Rother's natural environment will be protected and, wherever possible, enhanced. This will be achieved by:	There are no LSEs of this policy on Habitats Sites.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	a. Securing net gains for biodiversity and establishing ecological networks that are climate resilient; b. Enhancing opportunities for the public to appropriately access the natural environment, while protecting sensitive and designated areas; c. Conserving and enhancing the biodiversity and ecological value of internationally, nationally, regionally and locally designated sites, habitats and species; d. Supporting opportunities for management, restoration, creation and enhancement of habitats, including the joining up of existing priority habitats and species, in line with the opportunities identified in the East Sussex and Brighton & Hove Local Nature Recovery Strategy; e. Restoring and enhancing the green and blue infrastructure network, particularly in localities where deficits are identified, in accordance with Policy ENV13 (Green & Blue Infrastructure). f. Otherwise supporting opportunities which contribute to nature recovery in line with the East Sussex and Brighton and Hove Local Nature Recovery Strategy.	This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.
Policy ENV8: Habitats and Species	Development must protect and not adversely impact on internationally, nationally and locally designated sites in the district, as well as other areas of importance for their geodiversity and biodiversity value. Development proposals likely to affect designated sites or irreplaceable habitats must meet the requirements set out in national planning policy relevant to the site designation or habitat status. Development proposals which would entail the loss or deterioration of irreplaceable habitats will be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists. Measures to prevent harm to ancient woodland and ancient or veteran trees, including the implementation of appropriate buffers to development, will be required as	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	part of any relevant development proposal in accordance with Policy LAN1 (Landscape Character & Stewardship). In all areas, whether within or outside a designated site, development proposals should identify and incorporate opportunities to protect, restore and create wildlife habitats, strengthen ecological networks and support the delivery of the East Sussex and Brighton and Hove Local Nature Recovery Strategy in accordance with Policy ENV9 (Local Nature Recovery Strategy). In addition, development proposals must: a. Retain, protect and provide appropriate buffers to ecological and geological features and provide suitable management of those features; b. Incorporate biodiversity/ecological service enhancement features, designing-in provisions for wildlife; c. Seek to eradicate or control any invasive non-native species on-site, and conserve and support the recovery of protected, priority, rare and notable species on-site. d. An ecological survey and report, prepared by a suitably qualified professional, will be required for all development proposals likely to impact on designated sites, protected species or wildlife habitats. The mitigation hierarchy will be applied so that: a. Harm to biodiversity and geodiversity is avoided wherever possible; then b. Appropriate mitigation is provided to ensure no net loss or a net gain is achieved; then c. Where appropriate, compensation is delivered to offset any residual damage to biodiversity. Biodiversity Net Gain will be required in accordance with Policy ENV10 (Biodiversity Net Gain).	
Policy ENV9: Local Nature Recovery Areas	Development proposals must, proportionate to the scale of development, show how they contribute to the delivery of and align with the East Sussex	There are no LSEs of this policy on Habitats Sites.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	and Brighton & Hove Local Nature Recovery Strategy, taking opportunities to implement and support the principles, priorities and measures set out in the strategy.	This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.
Policy ENV10: Biodiversity Net Gain	All qualifying development proposals must achieve a minimum 20% Biodiversity Net Gain over a pre-development biodiversity value (as appropriately calculated) and be accompanied by a Biodiversity Net Gain strategy that: a. Establishes the pre-development biodiversity value of the development site in line with the most up-to-date legislation; b. Demonstrates that the mitigation hierarchy has been employed in securing biodiversity net gain; i. Avoidance ii. Mitigation iii. Compensation c. Where on-site provision is evidenced as not possible in line with the Biodiversity Gain Hierarchy, locates off-site provision (as close as possible to the development site, or if that is not possible, elsewhere within the Rother Plan Area) where it should contribute towards strategic networks such as those identified within the East Sussex Local Nature Recovery Strategy; d. As a last resort, and with the agreement of the local planning authority that on or off-site provision is not possible, details the purchase of credits for biodiversity gain through the national biodiversity credit scheme;	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	e. Provides long-term management details of how the biodiversity net gain will be maintained for at least 30 years (or time defined by most up-to-date legislation, if that period is longer) after the development is completed.	
Policy ENV11: Sustainable Access and Recreation Management Strategy	Development proposals that may have an increase in recreational impacts to the Dungeness Complex of Habitats Sites (for example, from walking, water-based sports, cycling, dog walking and tourism related development), resulting in a likely significant effect, alone or in-combination with other plans or projects, must provide appropriate mitigation to avoid an adverse effect on the integrity of the sites.	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.
Policy ENV12: Bewl Water	Development proposals within or affecting the setting of Bewl Water must: a. Conserve and enhance its distinctive landscape character and scenic beauty. b. Conserve and enhance its significant biodiversity and ecological value, in line with Policy ENV7 (Biodiversity). c. Protect local amenity particularly to maintain the area's tranquillity. d. Maintain dark skies, in line with Policy LAN4 (Light Pollution & Dark Skies). e. Safeguard Bewl Water as a recreational, economic and social amenity for the local community and visitors. f. Protect Bewl Water as a key freshwater resource. Development proposals for compatible recreational uses, including sensitive water-based recreation, will be supported subject to compliance with the criteria above and other Local Plan policies.	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
Policy ENV13: Green and Blue Infrastructure	The protection, enhancement, restoration and provision of green and blue infrastructure (GBI), including sports and recreation spaces (both formal and informal), allotments, community gardens, and orchards, will be achieved by: Safeguarding existing green and blue infrastructure a. The loss of existing open space, sports and recreational buildings and land, including playing fields and formal play spaces, will not be permitted unless it meets the tests set out in the NPPF. Enhancement and new provision b. In addition to meeting the Open Space Standards in Policy ENV14, development proposals, where relevant, will be expected to enhance or restore existing GBI provision and create new provision on-site that connects to the wider GBI network, particularly in localities where qualitative or quantitative deficits are identified by evidence, including the Rother Green and Blue Infrastructure Study (2026). c. Proposals for the improvement and restoration of existing, or provision of new, GBI will be supported. d. Development that creates opportunities to enhance public accessibility, active travel connectivity, and enjoyment of the green and blue infrastructure network, while protecting sensitive, designated sites for nature conservation via considerate landscaping schemes, access management, and appropriate buffer zones, will be supported. Quality and design of new GBI e. Developments involving GBI provision are required to demonstrate how their proposals: Respect and enhance the landscape character and distinctiveness of the local area;	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. 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. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	Respond to and integrate with the strategic GBI network where possible, providing multifunctional links to existing GBI outside the development's boundaries; Safeguard and positively integrate existing GBI corridors and assets, including mature trees, hedgerows, ponds and watercourses, with appropriate ecological and landscape buffers where necessary; Incorporate GBI features of varying scales into the development (e.g., street tree provision, biodiversity-enhancing planting, green roofs, green walls); Are designed to be multifunctional, actively aiding in climate change adaptation through features such as nature-based SuDS, nature recovery, urban cooling, and biodiversity enhancement in line with Policy ENV7 (Biodiversity) and the East Sussex and Brighton and Hove Local Nature Recovery Strategy. f. Developments of two hectares or more or 50 dwellings or more are required to submit a comprehensive GBI Plan as part of their proposals. This must be prepared in accordance with the Rother Green and Blue Infrastructure Study (or relevant adopted guidance). Consideration of blue infrastructure g. Sensitive water-based recreation along the coast and in other bodies of water will be supported, subject to compliance with, where relevant, Policies and ENV11 (Sustainable Access & Recreation Management Strategy) and ENV12 (Bewl Water). h. Development on sites containing or adjacent to a water course or water body (Blue Infrastructure) must demonstrate there is no unacceptable adverse impact on biodiversity, the environment and local amenity, in accordance with other Local Plan policies. Management	

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	i. All relevant proposals are required to provide appropriate specification and maintenance plans for the proposed GBI throughout the lifetime of the development. j. Proposals involving cross-boundary water-based recreation activities that benefit from waters within Rother must be accompanied by a detailed management plan which considers impacts including those on biodiversity, environment, and amenity. k. Appropriate arrangements and funding for the future long-term management and maintenance of GBI must be identified and implemented. Where appropriate, the council will secure this via planning conditions and/or planning obligations.	
Policy ENV14: Recreational Facilities & Open Space	Amount and type of provision Development proposals should protect and maximise opportunities to incorporate publicly accessible, high-quality open space, as well as enhance local provision. Residential developments will be required to provide high-quality open space on-site, wherever possible, in accordance with the standards set out below, which are minimum standards. Off-site provision Off-site provision of open space will only be acceptable where it can be clearly demonstrated that: a. Site constraints prevent or otherwise inhibit the incorporation of adequately sized and practically usable open space on the proposed development site; or b. There are demonstrable wider public benefits for delivering the required provision off-site. Where the Council is satisfied that the requirements of (3) above are met, planning contributions and/or legal agreements will be used to secure appropriate high-quality and conveniently accessible off-site provision, in	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. 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. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	line with the required minimum standards, and/or to secure significant enhancements to existing provision. Design of recreational and sports facilities and open space Where open space, sports, play, or ancillary recreational facilities are provided by new development they must be of a high-quality design, particularly to ensure they are enduring, inclusive and fit for purpose. Development proposals must demonstrate that the provision: a. Is integral to the overall layout and design of development, and clear focal points for activity, and not relegated to leftover, unusable, or marginal land; b. Is located in prominent, well-used and well-overlooked areas of the development, ensuring they are safe, accessible and benefit from natural surveillance; c. Essential ancillary facilities (such as toilets, café, waste management points, maintenance access, changing rooms) are adequately provided and well positioned to support the operation of the site; d. Uses ground surfaces and building materials, and incorporate SuDS, that actively balance high visual amenity with long-term durability, low-maintenance requirements, and accessibility for all user groups. For formal playing pitches or outdoor sports facilities, the type, layout and technical specification must align with Rother’s Playing Pitch and Built Facilities Strategy and relevant Sport England design standards. Development proposals will be assessed against the latest Building for a Healthy Life or its successor document(s). Open Space Standards	
		Ha per 1,000 Residen

Policy	Summary of Policy					Likely Significant Effects (LSEs) Screening Outcome
		10 to 20 dwellings	21 to 100 dwellings	100 to 500 dwellings		
	Parks and gardens					
	Amenity Greenspace					
	Natural and semi-natural					
	Outdoor sport pitches, courts and greens, tracks and trails			1.60		
	Equipped designated play areas		0.25	0.25		
	Informal play provision	0.30	0.30	0.30		
	Ha per 1,000 Residents	0.30	0.55	2.15		
	Open Space Standards (ha per 1,000 residents by development size)					
Policy ENV15: Public Rights of Way	Protection and integration Where a proposed development site includes or is adjacent to a public right of way (PRoW), the proposal is required to demonstrate how it: a. Causes no unacceptable adverse impact on the character, visual amenity, safety, or public enjoyment of the route; b. Maintains the PRoW as a standalone facility, distinct from the development's vehicular highways and footways;					There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. 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.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	c. seamlessly integrates the PRoW into the site's layout, providing new, inclusive access points to the existing network for users of all ages and abilities; and d. protects, and where possible enhances, the alignment, landscape features (such as ancient banks and hedges), and setting of any identified historic routeway. Enhancement and new provision The enhancement of existing and creation of new PRoWs, greenways, and active travel routes will be supported where they: a. Improve active travel connectivity including between settlements, visitor attractions, and local services; particularly where they address an identified local deficiency in access; b. Provide upgrades or financial contributions towards the improvement of the existing PRoW network, where a development is likely to increase recreational pressure. Improvements should ensure the network remain resilient and fit for purpose; c. Are appropriately designed having regard to the built, natural, and historic setting; and d. Are appropriately located and managed to protect habitats including those sensitive to recreational pressures, in accordance with Policy ENV11 (Sustainable Access & Recreation Management Strategy) where relevant. Alterations and diversions The permanent loss or closure of a PRoW will be resisted. Where the diversion or alteration to a PRoW is proposed, it will only be acceptable where it is strictly necessary to facilitate the development and it is suitably demonstrate that:	There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	a. The proposed alternative route provides an equal or greater convenience, safety, and visual amenity for users; b. The historic alignment, character, and heritage value of any historic routeway is preserved; and c. Any alterations within or affecting the setting of the High Weald National Landscape strictly conserve and enhance the natural beauty and scenic quality of the landscape.	
Policy ENV16: Combe Valley Countryside Park	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). Within the CVCP, development proposals will only be supported where they: a. Are of a scale, form and design that preserves the landscape character of the Park and demonstrably align with the objectives set out in the published Strategy for the Combe Valley Countryside Park; and comply with Policy SS3 (Strategic Green Gaps). b. Support and enhance the usage of the Park as a key open space for Bexhill and Hastings and their wider catchment; and c. Provide for the conservation and, where appropriate, management of the land-based and marine designations within it. Development proposals for a stand-alone ground mounted solar installation at Pebsham Landfill Site, as identified on the Policies Map, will be supported in principle in line with other Local Plan policies.	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. 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. There are no impact pathways present and this policy is screened out from Appropriate Assessment.
Heritage		
Policy HER1: Conservation of the Historic Environment	Development proposals which conserve and enhance the historic environment, including through the safeguarding of heritage assets and their settings will be supported.	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	The benefits arising from the conservation and protection of heritage assets most at risk through neglect, decay or other threats will be given significant weight in the assessment of development proposals affecting them. Development proposals affecting the historic environment, including designated and non-designated heritage assets and their settings, must: - Consider and reinforce the historic significance and special character of the district's settlements, buildings and features through siting, scale, form and design, so that the effect of development on these characteristics can be taken into account in determining the application; - Take opportunities to improve areas of poor visual character or with poor townscape qualities; - Be based on a sound and thorough understanding of the significance of the heritage asset and its setting, including in terms of its history, layout, use, local relevance, fabric and archaeology, and demonstrate how this understanding has informed the design of the proposal; - 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; - Refer to the character analysis in Conservation Area Appraisals, where relevant; - In areas of archaeological potential, include appropriate archaeological assessment of both above and below-ground archaeology to determine their significance and the potential for harm during development and its avoidance or mitigation; - Follow best practice guidance from Historic England regarding alterations to improve energy efficiency, 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.	proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	Regard should be had to the conservation of historic public realm features as non-designated heritage assets, which cumulatively contribute to the landscape and townscape character particularly within the High Weald National Landscape.	
Policy HER2: Conservation & Re-use of Historic Buildings	Historic buildings will be retained in effective and appropriate use. Development proposals for the reuse and/or subsequent alteration of historic buildings should: a. Take a hierarchical approach for re-use as follows: i. The priority is for the building to remain in its traditional use or a use closely related to that use. For traditional farm buildings the priority is to remain in farm-associated use, or farm-related business purposes; ii. Where there is a demonstrable lack of need for such uses, consideration will be given to alternative economic uses, including workshops and office use or tourism uses; iii. 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; b. In accordance with Policy HER1 (Conservation of the Historic Environment), be based on a sound and thorough understanding of the significance of the building and its setting, including in terms of its history, layout, use, local relevance, fabric and archaeology, and demonstrate how this understanding has informed the design of the proposal; c. 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 traditional character and the contribution the building and its surroundings make to the wider landscape and countryside or townscape character; d. Follow best practice guidance, particularly that published by Historic England ; Secure net gains for biodiversity in accordance with Policy ENV7 (Biodiversity) including through the protection of existing wildlife habitats, and their enhancement,	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	by incorporating or retaining features which support priority or threatened species likely to be found at the location.	
Policy HER3: Shopfronts, Signage and Advertising	Development proposals for a new shopfront, an alteration to existing shopfront (including external blinds), or signage on buildings, will only be permitted where they: a. Relate appropriately, in size and design to the architectural and historic character and appearance of the building in which the shopfront is located; b. Relate appropriately, in size and design, to its overall setting in the street scene, and impact on public safety; and c. Have due regard to its proportions, size, design, visual relationship to upper storeys, materials, colour, height and width, and illumination. 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. 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. Other than in exceptional circumstances, free-standing signage and advertisements should have a close physical relationship to the premises that they serve. 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”.	There are no LSEs of this policy on Habitats Sites. This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.
Policy HER4: Doors, Windows & Roofscapes in	For listed buildings and unlisted buildings in Conservation Areas, the Council will support proposals that preserve or enhance historic character,	There are no LSEs of this policy on Habitats Sites.

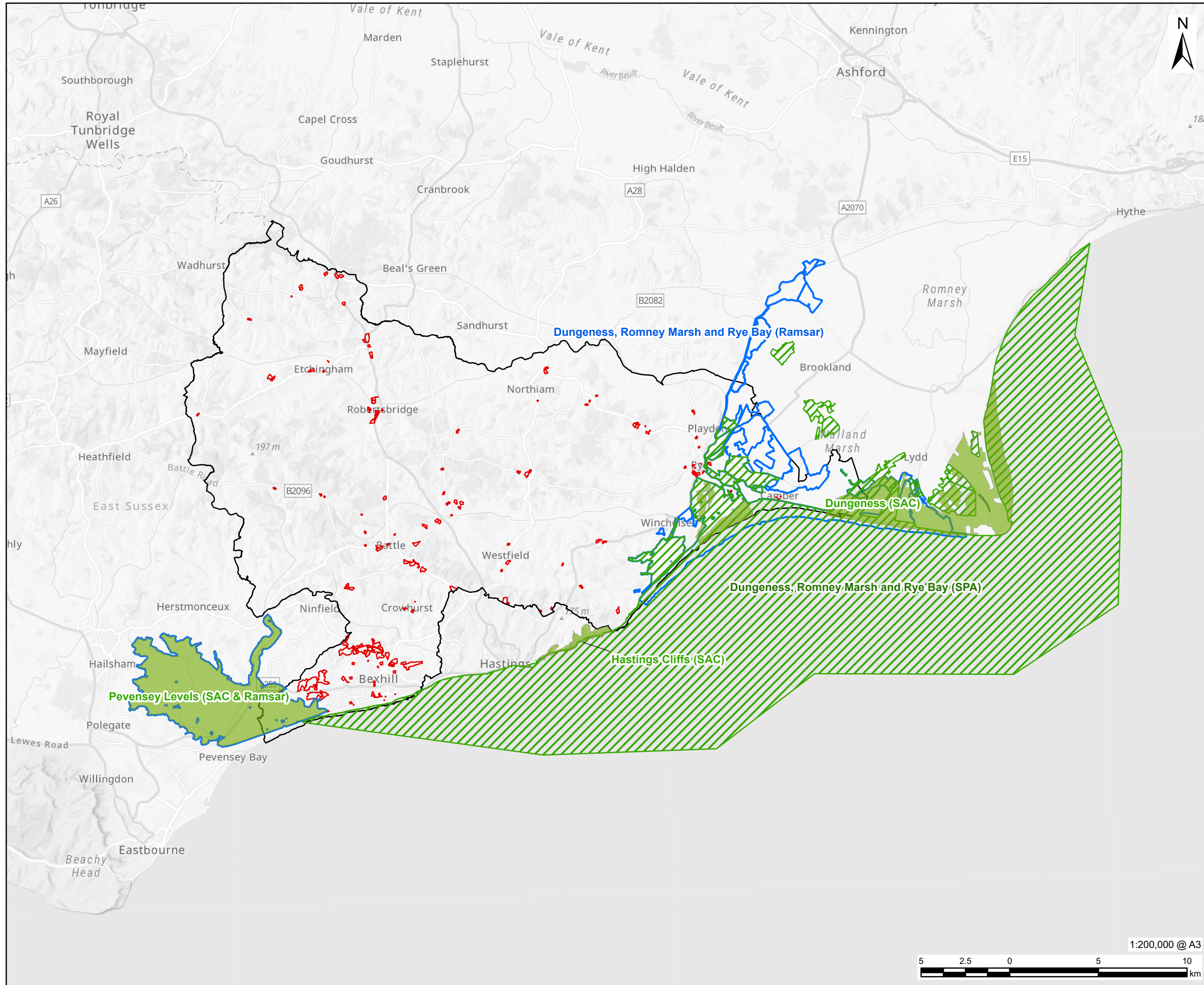
Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
Conservation Areas & Listed Buildings	appearance and significance, and that respect traditional form, detailing, materials and local context and distinctiveness. Particular regard will be had to Rother's varied historic character, including Bexhill's Victorian and Edwardian seaside townscape, the historic market towns of Rye and Battle, Winchelsea's planned form, and the rural vernacular of High Weald villages, hamlets and farmsteads. Where proposals affect a listed building, its special architectural or historic interest must be preserved. This applies to the building as a whole, including its fabric, form, detailing, plan form, setting and later phases of alteration, regardless of whether the affected elevation, roof slope or feature is visible from the public realm. Alterations to doors, windows and roofs will be supported where they are informed by the building's significance and preserve its special interest. Repair should normally be preferred to replacement. Where replacement is justified, it should match the historic or traditional form, material, profile, finish, glazing pattern, opening method, construction and detailing. Where evidence exists, replacement windows should replicate as closely as practicable the original fenestration fitted to the building, including the arrangement of panes, glazing bars, frame proportions, opening method and relationship to the surrounding opening, unless an alternative approach would better reveal or sustain significance. For unlisted buildings in Conservation Areas, proposals will be assessed according to the contribution made by the building, elevation, roof slope or feature to the area's character and appearance. On elevations and roof slopes visible from the public realm, including streets, lanes, footpaths, open spaces, the coast and wider landscape views, replacement windows, doors and roof coverings will be expected to closely reflect the traditional or established historic form, proportions, materials, profiles, finishes, opening method and detailing of the original or characteristic features. Where evidence exists, proposals should replicate closely the original fenestration fitted to the building. Greater flexibility may be appropriate on	This is a development management policy which gives general development guidance for future proposals, it does not provide for any specific development. There are no impact pathways present and this policy is screened out from Appropriate Assessment.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
	rear, secondary or concealed elevations of unlisted buildings, provided the works remain sympathetic and do not harm the building's integrity, group value or the character or appearance of the conservation area. The original fenestration includes the arrangement of panes, glazing bars, frame proportions, opening method and relationship to the surrounding opening. Traditional or sympathetic materials and detailing will be supported where they preserve the special interest of a listed building or the character or appearance of a Conservation Area. Slim-profile double glazing, secondary glazing and other thermal improvements will be acceptable where they preserve traditional proportions and detailing and do not harm listed building significance or Conservation Area character. Replacement roof coverings will be supported where they closely match the original or traditional material, colour, texture, profile, gauge, coursing and fixing method. Particular regard will be given to locally characteristic materials, including natural slate, handmade or traditional clay tiles, and roofing treatments that contribute positively to Rother's historic towns, villages, rural buildings and coastal settlements. Alternative roofing materials may be acceptable on unlisted buildings where the material preserves the building and the Conservation Area. For listed buildings, alternative materials will only be acceptable where they preserve the building's special architectural or historic interest, regardless of visibility. Proposals should positively respond to local character and heritage significance, including through appropriate treatment of rooflights, openings, chimneys, eaves, verges, materials and joinery details. Reinstatement of historically appropriate forms and detailing will be encouraged where it would enhance the listed building or Conservation Area.	

Appendix C Figures

Figure 4 Allocations and Habitats Sites

Figure 5 Pevensey Levels Hydrological Catchment Area



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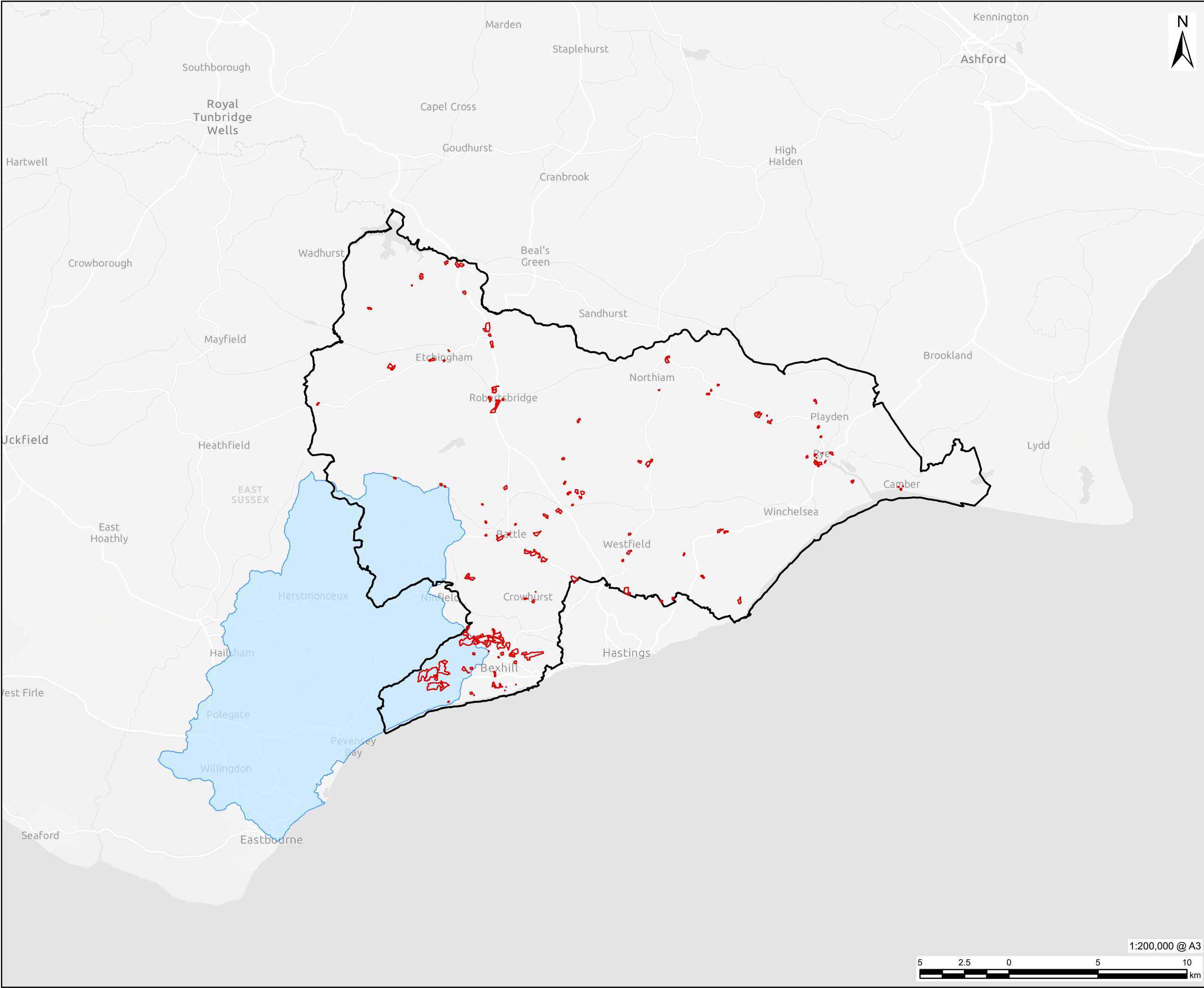
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60719400
FIGURE TITLE
Allocations and European Sites

FIGURE NUMBER

Figure 1



AECOM

PROJECT

Rother Local Plan Habitats
Regulations Assessment

CLIENT

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LEGEND

- Rother District Boundary
- LP HRA Sites
- Pevensey Levels Catchment Area

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ISSUE PURPOSE

FINAL

PROJECT NUMBER

60719400

FIGURE TITLE

Pevensey Levels Hydrological
Catchment

FIGURE NUMBER

Figure 5

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Appendix D Air Quality Modelling

Data Modelling of air quality in support of analysis for the RLP was completed. The focus of the modelling is the A259 which 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. Transects for modelling were used in the key areas of saltmarsh (the habitat vulnerable to nitrogen deposition) and these are shown in Figure 6 below.

Data for the air quality modelling is provided in Table 5 which provides results for modelling for two transects for NO_x, N Deposition, N Acid Deposition and NH₃ table columns are interpreted as follows:

- 2042 FB – 2042 Future Base (Do Nothing scenario)
- 2042 Op1 – Modelled results taking into account increases in traffic through growth not including the impacts of the RLP
- 2042 Op2 – Modelled results taking into account increases in traffic through growth including the impacts of the RLP
- Op2-Op1 – Modelled results for RLP alone
- Op2-FB – Modelled in-combination results for RLP and all other traffic growth

Table 5 Air Quality Modelling Results

Receptor	NOx						N Deposition						N Acid Deposition						NH3						Critical Load				
	2023 Base	2042 FB	2042 Op1	2042 Op2	Op2-Op1	Op2-FB	2023 Base	2042 FB	2042 Op1	2042 Op2	Op2-Op1	Op2-FB	2023 Base	2042 FB	2042 Op1	2042 Op2	Op2-Op1	Op2-FB	2023 Base	2042 FB	2042 Op1	2042 Op2	Op2-Op1	Op2-FB	Receptor	Transect ID	Min	CL	Max
RDC_1_0m	28.65	8.33	8.82	8.92	0.10	0.58	18.99	15.52	17.44	17.82	0.38	2.30	1.36	1.11	1.25	1.27	0.03	0.16	2.27	2.04	2.40	2.47	0.07	0.43	RDC_1_0m	RDC_1			1.419
RDC_1_10m	17.46	7.50	7.69	7.73	0.04	0.23	14.28	12.20	12.94	13.09	0.15	0.89	1.02	0.87	0.92	0.94	0.01	0.06	1.50	1.41	1.55	1.58	0.03	0.17	RDC_1_10m	RDC_1			1.419
RDC_1_20m	15.04	7.32	7.45	7.47	0.03	0.15	13.25	11.48	11.97	12.06	0.10	0.58	0.95	0.82	0.85	0.86	0.01	0.04	1.33	1.27	1.36	1.38	0.02	0.11	RDC_1_20m	RDC_1			1.419
RDC_1_30m	13.97	7.25	7.34	7.36	0.02	0.11	12.80	11.16	11.53	11.61	0.08	0.44	0.91	0.80	0.82	0.83	0.01	0.03	1.26	1.21	1.28	1.30	0.01	0.08	RDC_1_30m	RDC_1			1.419
RDC_1_40m	13.36	7.20	7.28	7.30	0.02	0.09	12.54	10.98	11.28	11.35	0.06	0.36	0.90	0.78	0.81	0.81	0.00	0.03	1.22	1.18	1.24	1.25	0.01	0.07	RDC_1_40m	RDC_1			1.419
RDC_1_50m	12.97	7.17	7.24	7.25	0.01	0.08	12.37	10.87	11.12	11.18	0.06	0.31	0.88	0.78	0.79	0.80	0.00	0.02	1.19	1.16	1.20	1.22	0.01	0.06	RDC_1_50m	RDC_1			1.419
RDC_1_60m	12.69	7.15	7.21	7.22	0.01	0.07	12.25	10.78	11.01	11.06	0.05	0.27	0.88	0.77	0.79	0.79	0.00	0.02	1.17	1.14	1.18	1.19	0.01	0.05	RDC_1_60m	RDC_1			1.419
RDC_1_70m	12.49	7.14	7.19	7.20	0.01	0.06	12.16	10.72	10.92	10.97	0.04	0.24	0.87	0.77	0.78	0.78	0.00	0.02	1.15	1.13	1.17	1.18	0.01	0.05	RDC_1_70m	RDC_1			1.419
RDC_1_80m	12.32	7.12	7.17	7.18	0.01	0.06	12.10	10.67	10.85	10.89	0.04	0.22	0.86	0.76	0.78	0.78	0.00	0.02	1.14	1.12	1.15	1.16	0.01	0.04	RDC_1_80m	RDC_1			1.419
RDC_1_90m	12.19	7.11	7.16	7.17	0.01	0.05	12.04	10.63	10.80	10.84	0.04	0.20	0.86	0.76	0.77	0.77	0.00	0.01	1.13	1.11	1.14	1.15	0.01	0.04	RDC_1_90m	RDC_1			1.419
RDC_1_100m	12.08	7.11	7.15	7.16	0.01	0.05	11.99	10.60	10.75	10.79	0.04	0.19	0.86	0.76	0.77	0.77	0.00	0.01	1.13	1.11	1.13	1.14	0.01	0.04	RDC_1_100m	RDC_1			1.419
RDC_1_110m	11.99	7.10	7.14	7.15	0.01	0.05	11.95	10.57	10.71	10.75	0.04	0.18	0.85	0.76	0.77	0.77	0.00	0.01	1.12	1.10	1.13	1.13	0.01	0.03	RDC_1_110m	RDC_1			1.419
RDC_1_120m	11.92	7.09	7.13	7.14	0.01	0.04	11.92	10.55	10.68	10.71	0.03	0.16	0.85	0.75	0.76	0.77	0.00	0.01	1.12	1.10	1.12	1.13	0.01	0.03	RDC_1_120m	RDC_1			1.419
RDC_1_130m	11.85	7.09	7.12	7.13	0.01	0.04	11.89	10.53	10.65	10.69	0.03	0.15	0.85	0.75	0.76	0.76	0.00	0.01	1.11	1.09	1.12	1.12	0.01	0.03	RDC_1_130m	RDC_1			1.419
RDC_1_140m	11.79	7.08	7.12	7.12	0.01	0.04	11.87	10.51	10.63	10.66	0.03	0.15	0.85	0.75	0.76	0.76	0.00	0.01	1.11	1.09	1.11	1.12	0.01	0.03	RDC_1_140m	RDC_1			1.419
RDC_1_150m	11.74	7.08	7.11	7.12	0.01	0.04	11.84	10.50	10.61	10.64	0.03	0.14	0.85	0.75	0.76	0.76	0.00	0.01	1.10	1.09	1.11	1.11	0.01	0.03	RDC_1_150m	RDC_1			1.419
RDC_1_160m	11.69	7.08	7.11	7.11	0.01	0.04	11.82	10.48	10.59	10.62	0.03	0.13	0.84	0.75	0.76	0.76	0.00	0.01	1.10	1.08	1.10	1.11	0.01	0.03	RDC_1_160m	RDC_1			1.419
RDC_1_170m	11.65	7.07	7.10	7.11	0.01	0.04	11.81	10.47	10.57	10.60	0.03	0.13	0.84	0.75	0.76	0.76	0.00	0.01	1.10	1.08	1.10	1.11	0.01	0.02	RDC_1_170m	RDC_1			1.419
RDC_1_180m	11.62	7.07	7.10	7.11	0.01	0.03	11.79	10.46	10.56	10.58	0.03	0.12	0.84	0.75	0.75	0.76	0.00	0.01	1.09	1.08	1.10	1.10	0.01	0.02	RDC_1_180m	RDC_1			1.419
RDC_1_190m	11.58	7.07	7.09	7.10	0.01	0.03	11.78	10.45	10.54	10.57	0.03	0.12	0.84	0.75	0.75	0.75	0.00	0.01	1.09	1.08	1.10	1.10	0.01	0.02	RDC_1_190m	RDC_1			1.419
RDC_1_200m	11.55	7.07	7.09	7.10	0.01	0.03	11.76	10.44	10.53	10.56	0.03	0.11	0.84	0.75	0.75	0.75	0.00	0.01	1.09	1.08	1.09	1.10	0.00	0.02	RDC_1_200m	RDC_1			1.419
RDC_2_3.7m	21.14	7.78	8.07	8.13	0.06	0.35	15.83	13.29	14.43	14.65	0.23	1.37	1.13	0.95	1.03	1.05	0.02	0.10	1.75	1.61	1.83	1.87	0.04	0.26	RDC_2_3.7m	RDC_2			1.419
RDC_2_10m	17.04	7.47	7.65	7.69	0.04	0.22	14.10	12.07	12.77	12.91	0.14	0.84	1.01	0.86	0.91	0.92	0.01	0.06	1.47	1.38	1.52	1.54	0.03	0.16	RDC_2_10m	RDC_2			1.419
RDC_2_20m	14.76	7.30	7.42	7.45	0.02	0.14	13.13	11.40	11.85	11.94	0.09	0.55	0.94	0.81	0.85	0.85	0.01	0.04	1.31	1.26	1.34	1.36	0.02	0.10	RDC_2_20m	RDC_2			1.419
RDC_2_30m	13.74	7.23	7.32	7.34	0.02	0.11	12.70	11.10	11.44	11.51	0.07	0.41	0.91	0.79	0.82	0.82	0.01	0.03	1.24	1.20	1.26	1.28	0.01	0.08	RDC_2_30m	RDC_2			1.419
RDC_2_40m	13.16	7.19	7.26	7.27	0.02	0.09	12.46	10.92	11.20	11.26	0.06	0.34	0.89	0.78	0.80	0.80	0.00	0.02	1.20	1.17	1.22	1.23	0.01	0.06	RDC_2_40m	RDC_2			1.419
RDC_2_50m	12.79	7.16	7.22	7.23	0.01	0.08	12.30	10.81	11.05	11.10	0.05	0.29	0.88	0.77	0.79	0.79	0.00	0.02	1.18	1.15	1.19	1.20	0.01	0.05	RDC_2_50m	RDC_2			1.419
RDC_2_60m	12.52	7.14	7.19	7.20	0.01	0.07	12.19	10.73	10.94	10.99	0.04	0.25	0.87	0.77	0.78	0.78	0.00	0.02	1.16	1.13	1.17	1.18	0.01	0.05	RDC_2_60m	RDC_2			1.419
RDC_2_70m	12.32	7.12	7.17	7.18	0.01	0.06	12.10	10.68	10.86	10.90	0.04	0.22	0.86	0.76	0.78	0.78	0.00	0.02	1.14	1.12	1.16	1.16	0.01	0.04	RDC_2_70m	RDC_2			1.419
RDC_2_80m	12.17	7.11	7.16	7.17	0.01	0.05	12.04	10.63	10.80	10.84	0.04	0.20	0.86	0.76	0.77	0.77	0.00	0.01	1.13	1.11	1.14	1.15	0.01	0.04	RDC_2_80m	RDC_2			1.419
RDC_2_90m	12.04	7.10	7.14	7.15	0.01	0.05	11.98	10.59	10.75	10.78	0.03	0.19	0.86	0.76	0.77	0.77	0.00	0.01	1.13	1.11	1.13	1.14	0.01	0.04	RDC_2_90m	RDC_2			1.419
RDC_2_100m	11.94	7.10	7.13	7.14	0.01	0.05	11.94	10.56	10.71	10.74	0.03	0.17	0.85	0.75	0.76	0.77	0.00	0.01	1.12	1.10	1.13	1.13	0.01	0.03	RDC_2_100m	RDC_2			1.419
RDC_2_110m	11.85	7.09	7.12	7.13	0.01	0.04	11.90	10.54	10.67	10.70	0.03	0.16	0.85	0.75	0.76	0.76	0.00	0.01	1.11	1.09	1.12	1.13	0.01	0.03	RDC_2_110m	RDC_2			1.419
RDC_2_120m	11.78	7.08	7.12	7.12	0.01	0.04	11.87	10.52	10.64	10.67	0.03	0.15	0.85	0.75	0.76	0.76	0.00	0.01	1.11	1.09	1.11	1.12	0.01	0.03	RDC_2_120m	RDC_2			1.419
RDC_2_130m	11.71	7.08	7.11	7.12	0.01	0.04	11.84	10.50	10.62	10.64	0.02	0.14	0.85	0.75	0.76	0.76	0.00	0.01	1.10	1.09	1.11	1.11	0.00	0.03	RDC_2_130m	RDC_2			1.419
RDC_2_140m	11.66	7.07	7.10	7.11	0.01	0.04	11.82	10.48	10.59	10.62	0.02	0.13	0.84	0.75	0.76	0.76	0.00	0.01	1.10	1.08	1.10	1.11	0.00	0.03	RDC_2_140m	RDC_2			1.419
RDC_2_150m	11.60	7.07	7.10	7.10	0.01	0.03	11.80	10.47	10.57	10.59	0.02	0.13	0.84	0.75	0.76	0.76	0.00	0.01	1.10	1.08	1.10	1.11	0.00	0.02	RDC_2_150m	RDC_2			1.419
RDC_2_160m	11.56	7.07	7.09	7.10	0.01	0.03	11.78	10.46	10.55	10.58	0.02	0.12	0.84	0.75	0.75	0.76	0.00	0.01	1.09	1.08	1.10	1.10	0.00	0.02	RDC_2_160m	RDC_2			1.419
RDC_2_170m	11.52	7.06	7.09	7.09	0.01	0.03	11.76	10.44	10.54																				

Figure 6 Air Quality Transects

