



Rother Local Plan 2025 - 2042

Sustainability Appraisal Report

Regulation 19 (Pre-submission) version

September 2026

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Chapter 1:

Background

This chapter provides information about the new Rother Local Plan and the Sustainability Appraisal process, which has helped to inform the preparation of the plan.

What is a Sustainability Appraisal?

- 1.1. A Sustainability Appraisal (SA) is a process that is legally required to be carried out during the preparation of a Local Plan.¹ Its role is to promote sustainable development by assessing the extent to which the emerging plan, when considered against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.
- 1.2. The SA should be undertaken as an iterative process to inform the preparation of the Local Plan. It provides an opportunity to consider ways by which the plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. By doing so, the SA can help make sure that the proposals in the plan are appropriate given the reasonable alternatives.
- 1.3. The Council's approach to the Sustainability Appraisal incorporates the requirements of the [Environmental Assessment of Plans and Programmes Regulations 2004](#) - also known as the 'Strategic Environmental Assessment (SEA) Regulations'. This approach is supported by Government's Planning Practice Guidance (PPG). SEA looks at only the environmental effects of a plan, whereas SA considers the environmental impacts of a plan along with wider economic and social effects. For this report therefore, the term SA should be regarded as SA incorporating the requirements of SEA.

Additional assessments

- 1.4. The Council's approach to SA integrates a Health Impact Assessment (HIA). This is an assessment of specific health impacts which is brought into the wider SA process. The Council has engaged with East Sussex County Council's Healthy Places Team in setting this approach.

- 1.5. A Habitats Regulations Assessment (HRA) is also required to be undertaken during the preparation of the local plan however this is dealt with through a separate, standalone process. HRA reports have been published as part of the Local Plan evidence base.
- 1.6. An Equalities Impact Assessment of the Local Plan is also undertaken separately from the SA in order to satisfy requirements of the Equality Act 2010. However, it is noted that SA inherently addresses equalities impacts in the round through the consideration of social, economic and environmental objectives and outcomes.

About the new Rother Local Plan

- 1.7. The Local Plan forms part of the statutory development plan for the administrative area of Rother district. This currently comprises the [Core Strategy](#) (2014) and [Development and Site Allocations](#) (2019) Local Plans prepared by the Rother District Council, the [Waste and Minerals Local Plan](#) prepared by East Sussex County Council, and 'made' (adopted) [Neighbourhood Plans](#) prepared by local community groups, including Parish Councils.
- 1.8. Rother District Council ("the Council") is preparing a new Local Plan. This will contain the vision, strategic objectives and planning policies to steer development decisions across the district. It is the starting point for all decisions about new development and ensures that the planning system is plan-led. Once adopted, the new Local Plan will update and replace the extant Core Strategy and Development and Site Allocations Local Plans.

The plan-making system

- 1.9. The Government introduced a new-plan making system for England through the Levelling Up and Regeneration Act 2023. A package of statutory instruments has since been published, including the new Town and

¹ The requirement was made through provisions in the Planning and Compulsory Purchase Act 2004.

Country Planning (Local Planning) (England) Regulations 2026, which came into force date on 25th March 2026, replacing the 2012 plan-making regulations.

- 1.10. On 16th December 2025, the Government launched a consultation on the “National Planning Policy Framework: proposed reforms and other changes to the planning system”. This set out proposals to update the existing National Planning Policy Framework (NPPF) (2024), to bring it in line with the new planning system. Outcomes of the consultation are, at the time of writing, still pending.
- 1.11. The Council’s Local Development Scheme (LDS) sets the timetable for the production of the new Local Plan. The LDS currently provides for the new Rother Local Plan to be submitted to the Secretary of State for examination in December 2026. This complies with the Government’s deadline for plans to be prepared and assessed in accordance with the “legacy” planning system, (i.e., Town and Country Planning (Local Planning) Regulations 2012, as amended, along with the Government’s National Planning Policy Framework (NPPF) (2024) and other national policies, including the Planning Policy for Traveller Sites (2024). The NPPF makes clear that Local Plans should be up-to-date and prepared with the objective of contributing to sustainable development.

Cross-boundary cooperation

- 1.12. The Duty to Cooperate was established under Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended by Section 110 of the Localism Act 2011). It placed a legal duty on local planning authorities, county councils and public bodies in England to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan preparation relating to strategic cross-boundary matters.
- 1.13. Importantly, the Duty to Cooperate was revoked by the Government with effect from 25th March 2026. Accordingly, emerging local

plans – including the new Rother Local Plan - are no longer required to meet provisions on the Duty to Cooperate. However, plans examined under the “legacy” system will still be assessed in line with NPPF (2024) policies and associated guidance on maintaining effective cooperation.

The plan period

- 1.14. The period covered by the new Local Plan (the “plan period”) has changed since the first Draft Local Plan was published in 2024. A plan period covering 2020 – 2040 was initially proposed. However, the Council has now revised the plan period to 2025 – 2042. This is because the NPPF requires local planning authorities to have up-to-date plans, with strategic policies that cover a period of at least 15-years from the date of their adoption. Moving the plan period on, to end in 2042, will ensure this requirement is met if the Local Plan is adopted, as anticipated, in 2027.
- 1.15. The Council does not consider that the Sustainability Appraisal process or outcomes of this have been affected by virtue of revising the plan period during the early-stage production of the Local Plan. The appraisal looks over the short, medium and long-term and this has been considered throughout the SA process.

Timetable for preparing the Local Plan

- 1.16. The timetable for preparing the new Local Plan is set out in the Council’s [Local Development Scheme](#) (LDS), the latest version of which was adopted in March 2025. As noted above, the LDS provides for the submission of the new Rother Local Plan and required supporting documents to the Secretary of State for independent examination by December 2026, and subject to the plan being found sound, adoption in 2027.
- 1.17. Key milestones in the plan preparation process to-date include:
 - Early stage (and ongoing) evidence gathering, with a wide range of policy

topic area studies and reports published on the Local Plan evidence base webpage;

- Public consultation on the draft Sustainability Appraisal / Strategic Environmental Assessment Scoping Report with statutory consultees (Environment Agency, Historic England and Natural England) and publication of the final SA/SEA Scoping Report in January 2021; and
- A statutory Regulation 18 stage consultation on the Draft Rother Local Plan 2020 – 2040, which was carried out from 30th April to 23rd July 2024. This draft Local Plan included proposals for policies on a range of thematic topic areas, but not site allocations. An Interim Sustainability Appraisal Report (2024) and Habitats Regulations Assessment Report (2024) were also published for consultation alongside the plan at this time.
- A statutory Regulation 18 stage consultation on the Draft Rother Local Plan 2025-2042 – Development Strategy and Site Allocations (2026), which was carried out from 26th January to 23rd March 2026. This set out updated proposals on the Development Strategy for the district, along with supporting area-based policies and site allocation policies. An Interim Sustainability Appraisal Report (2026) was published alongside the Pla, and a Habitats Regulations Assessment Background Paper (2026) was also published.

1.18. The Council has considered all representations received in response to the public consultations to inform the preparation of the consolidated, final Draft Rother Local Plan 2025-2042, the 'Proposed Submission Version' of the Plan, which is the subject of the Regulation 19 stage consultation. Following which, the Rother Local Plan and required supporting

documents will be submitted to the Secretary of State for independent examination.

Geographic context

- 1.19. The plan area for the new Rother Local Plan covers the entirety of the administrative boundary for Rother district. Rother is a one of 5 lower tier local authorities in East Sussex, also including Eastbourne Borough Council, Hastings Borough Council, Lewes District Council, and Wealden District Council. East Sussex County Council is the upper tier authority. The resident population of Rother is approximately 91,000, according to Census 2021 data, with roughly half of the population residing in Bexhill.
- 1.20. Rother is located on the South East Coast of England. It covers roughly 200 square miles by area, with a coastline spanning some 25 miles. The district is predominantly rural in nature and includes the High Weald National Landscape. The geographic context of Rother, and its neighbouring authority areas, is set out in Error! Reference source not found. below.
- 1.21. Rother contains the coastal town of Bexhill-on-Sea, and the historic towns of Battle and Rye. There are also many parishes, villages and other settlements located throughout the district. The A21 runs through the centre of the district north and south, and the A259 running east and west near the coast.
- 1.22. 83 per cent of the district is located within the High Weald National Landscape, a designated 'Area of Outstanding Natural Beauty'. The High Weald is one of the best remaining examples of a medieval landscape in Northern Europe consisting of woods, small fields, farmsteads and ancient routeways.
- 1.23. Rother benefits from the presence of built and natural heritage assets. The historic environment is a highly valued and distinctive feature of the area, with statutory protection of over 2,000 listed buildings, 10 Conservation Areas, a number of Scheduled

Ancient Monuments, as well as the ‘Historic Battlefield’ at Battle.

- 1.24. Approximately 7 per cent of the district includes internationally or nationally protected habitats sites. The Pevensy Levels, straddling the south-western boundary of the district, is a ‘Ramsar’ site, designated for its international importance as a wetland habitat and a Special Area of Conservation (SAC). On the south-eastern boundary, the Dungeness Complex of Habitats Sites comprises three overlapping international designations – the Dungeness, Romney Marsh and Rye Bay Special Protection Area (SPA) and Ramsar Site and the Dungeness Special Area of Conservation (SAC). There are also many Sites of Special Scientific Interest (SSSIs) in Rother.
- 1.25. The partly low-lying and coastal nature of the district, along with its intricate network of ridges and valleys, make it particularly vulnerable to flooding. The predominant flood risk comes from the sea, rivers and watercourses, although the district also experiences surface water flooding. The majority of the coast benefits from flood defences.
- 1.26. Rother district effectively wraps around Hastings Borough. Because of their proximity and interconnectivity, Rother and Hastings share both a housing market area and a functional economic market area. Both Councils are currently preparing new local plans and are working collaboratively on several shared evidence base documents, as well as working more strategically on cross-boundary issues, including the joint production of the SA/SEA Scoping Report (2021).

What is the Local Plan seeking to achieve?

- 1.27. The new Local Plan is being prepared to ensure that the Council has an up-to-date plan in place that sets the strategic

framework for managing new development and securing the timely delivery of infrastructure to support growth. Within this overall context, key aims of the plan include:

- Respond to significant changes to the wider planning context since the Rother Core Strategy and Development and Site Allocations Local Plans were adopted, including changes to planning legislation and revisions to the NPPF.
- Ensure the Local Plan both reflects and helps give effect to the Council’s key strategic documents, including the vision and outcomes sought by the Council Plan² – this sets out the 3 themes of ‘a thriving local economy’, ‘live well locally’ and ‘green to the core’.
- Respond to the climate emergency and deliver the outcomes sought by the Council’s Environment Strategy (2020) and Climate Strategy (2023) – in 2019 the Council declared a climate emergency and pledged to become a ‘carbon neutral’ district by 2030.
- Respond positively and proactively to Rother’s development needs by:

Addressing Government requirements to boost housing supply whilst meeting the different housing needs of Rother’s local communities;

Make provision for good quality jobs, training and employment opportunities, together with workspace to support local business needs including for the rural economy; and

Securing the timely delivery of infrastructure to support growth, particularly to support the health and wellbeing of the local community and reduce deprivation.

Protect and enhance Rother’s local distinctiveness and character, including

² Rother Council Plan 2025-2029.

its historic and natural environment, including the High Weald National Landscape the countryside and coastal areas.

To set the strategic context for neighbourhood planning.

- 1.28. It is noted that Rother Local Plan, Regulation 19 version, sets out a vision, overall priorities and key spatial objectives for the plan.

What is the Local Plan not seeking to achieve?

- 1.29. The Local Plan will be a strategic document and the level of detail included within the plan will therefore be proportionate to its strategic nature. That is to say that some planning matters may not be covered extensively, or indeed at all, by the plan policies. This is in the knowledge that such matters can be addressed by national planning policies and guidance, existing or future 'made' neighbourhood Plans, and/or through subsequent stages of the planning process, including at the planning application stage.
- 1.30. It is also noted that East Sussex County Council is responsible for preparing a Waste and Minerals Plan, which forms part of the statutory development plan.
- 1.31. The scope of the Local Plan is reflected in the scope of the SA.

Figure 1: Rother Local Plan geographic context



Chapter 2:

Sustainability context for Rother

This chapter explains the key stages involved in the Sustainability Appraisal process and sets out the Sustainability Appraisal Framework, a tool used to assess the Rother Local Plan against environmental, economic and social objectives.

The Sustainability Appraisal process

- 2.1. The SA consists of a number of stages that are undertaken during the preparation and implementation of the Local Plan. Key requirements for SA are set out in the legislation noted previously. The Government's PPG provides detailed guidance to help ensure these requirements are satisfied during the plan process. The PPG identifies 5 main stages in the SA process overall, as set out below³, with further details set out in **Figure 2**.

Key stages of the SA process

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

Stage B: Developing and refining options and assessing effects.

Stage C: Preparing the Sustainability Appraisal Report.

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

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

- 2.2. Stage A of the SA process was carried out with the preparation and publication of the SA/SEA Scoping Report in January 2021. A draft Scoping Report was initially prepared by the Council (working jointly with Hastings Borough Council) and then issued for formal consultation with the statutory environmental bodies. Whilst not legally required to do so, the Council also consulted with selected Government bodies, neighbouring authorities and other key stakeholders (mainly dealing with public health and transport). Informed by consultation feedback, the final SA/SEA Scoping Report (2021) was prepared and

published. This established the SA Framework for the preparation of the new Local Plan.

- 2.3. Stage B of the SA process commenced with the preparation and publication of the draft Rother Local Plan and associated Interim Sustainability Appraisal report, in April 2024. These documents were issued for a Regulation 18 stage consultation, which was carried out from 30th April to 23rd July 2024.
- 2.4. Stage B of the SA process then continued with the preparation and publication of the Rother Local Plan – Development Strategy and Site Allocations document, and the associated Interim Sustainability Appraisal report, in January 2026. These documents were issued for a Regulation 18 stage consultation, which was carried out from 26th January to 23rd March 2026. Stage B of the SA process continued subsequent to the consultation in 2026, with further consideration given to the reasonable alternatives (policy options) for the Local Plan as it was finalised.
- 2.5. Details on how the Council has carried out Stage B actions, in terms of the development and refining of options for the draft Local Plan, are set out later in this report.
- 2.6. Stage C has been carried out through the preparation of this Sustainability Appraisal Report. The report will be the subject of a statutory Regulation 19 stage consultation, alongside the Proposed Submission version of the Rother Local Plan, marking Stage D.
- 2.7. Stage E will be undertaken following the adoption of the new Rother Local Plan, subject to it being found sound and legally compliant through the examination process.

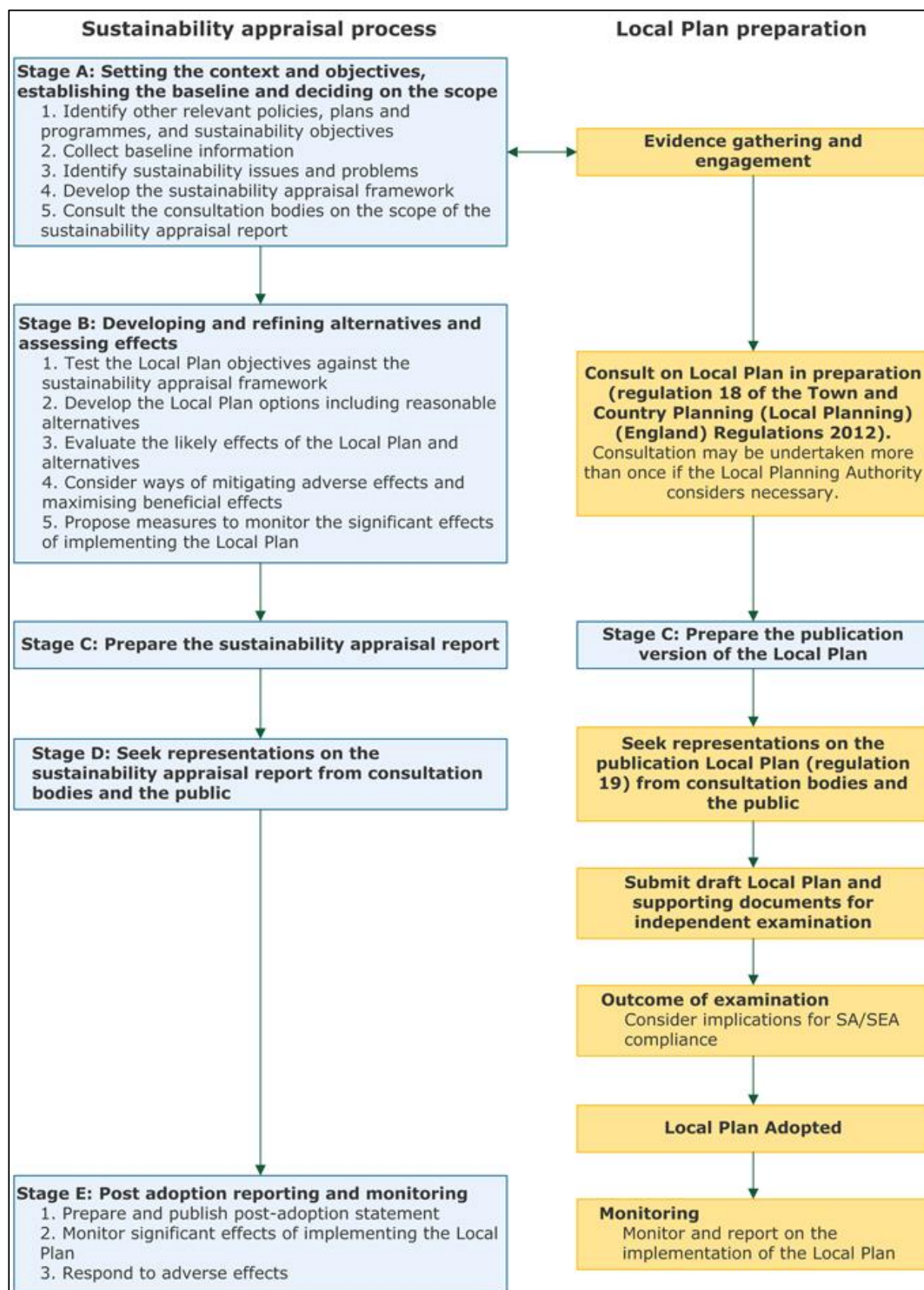
Meeting the SEA requirements

- 2.8. **Appendix 1** of this report signposts the requirements of the SEA Regulations and

³ MHCLG Planning Practice Guidance, Paragraph: 004 Reference ID: 11-004-20150209 (Revision date: 09 02 2015).

indicates the relevant sections of this SA Report which are considered to satisfy these.

Figure 2: SA process for the Local Plan⁴



⁴ Figure replicated from MHCLG Planning Practice Guidance, Paragraph: 013 Reference ID: 11-013-20140306 (Revision date 06 03 2014).

Revisiting the Stage A Scoping

- 2.9. Whilst the scope of the SA was established with the Stage A actions, it is an iterative process subject to review and updating as work on the plan progresses to take account of the latest available information.
- 2.10. The following section therefore provides a focussed update on the Stage A scoping, which should be read together with information and findings set out in the SA/SEA Scoping report (2021) and Interim SA reports (2024) and (2026) respectively.
- 2.11. The intention here is not to significantly change or otherwise alter the approach to the SA scoping work undertaken previously during the plan process, particularly as this has been subject to formal consultation with the statutory consultation bodies and amended in response to this. Rather, the aim is to review information previously presented to ensure the SA scope remains up-to-date and valid.

Review of plans, policies and programmes

- 2.12. The Local Plan does not sit in isolation. Its preparation and implementation must comply with international and national legislation, including that focussed on environmental protection, as well as national planning policy and guidance. Furthermore, in contributing to sustainable development, the Local Plan should seek to both link with and help give effect to the objectives set out by international, national, sub-regional and local programmes and strategies.
- 2.13. As part of the SA process, it is a requirement to identify relevant plans, policies and programmes and to set out their relationship with the Local Plan.⁵ This exercise was initially carried out as part of the SA/SEA Scoping Report (2021) and then updated with the Interim Sustainability Appraisal Report (2024)

published as part of the first Regulation 18 consultation on the draft Rother Local Plan.

- 2.14. The following section provides a summary of relevant key plans, policies and programmes. It focusses mainly on new documents published since the SA/SEA Scoping Report (2021) and Interim SA Reports (2024) and (2026) were published.
- 2.15. A more extensive list of key plans, policies, and programmes is set out at **Appendix 2** of this SA Report, and this has been updated from the SA/SEA Scoping Report.

International level

- 2.16. At the international level, Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive') and Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the 'Habitats Directive') remain particularly significant as they require Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) to be undertaken in relation to the emerging plan. These processes should be undertaken iteratively and integrated into the production of the plan in order to ensure that any potential negative environmental effects (including on European level nature conservation designations) are identified and can be mitigated.
- 2.17. There are a wide range of other (previous) EU Directives relating to issues such as water quality, waste and air quality, most of which have been transposed into UK law, as set out in previous SA reports and signposted in **Appendix 2**.

National level

- 2.18. The Planning and Compulsory Purchase Act 2004 is primary legislation that provides the main basis for the plan-led system in England. It is supported by secondary legislation, including the Town and Country

⁵ As set out in Schedule 2 of the SEA Regulations.

Planning (Local Planning) (England) Regulations 2012 (as amended), which provide further details on the process for the Council to prepare and adopt the Local Plan and other supporting documents.

- 2.19. As set out in Chapter 1 of this SA Report, the Town and Country Planning (Local Planning) (England) Regulations 2026 are now in force, superseding the 2012 Regulations, following the Levelling Up and Regeneration Act (discussed below). However, the Rother Local Plan is being prepared and examined under the 2012 Regulations, as part of the transitional arrangements to the new plan-making system.
- 2.20. The Local Plan is required to be consistent with national policy, including the National Planning Policy Framework. The NPPF sets out the Government's planning policies for England and how they should be applied. It includes parameters for the preparation of local plans and is also a material consideration in planning decisions. The NPPF is supported by the national Planning Practice Guidance. The NPPF was first introduced in 2012 and has been subject to multiple updates, with the latest version being published in August 2026.⁶ The NPPF makes clear that Local Plans should be up-to-date and provide a positive vision for the future of each area, together with a framework for meeting housing needs and addressing other economic, social and environmental priorities.
- 2.21. There is a separate Planning Policy for Traveller Sites, which was most recently updated in December 2024, and a Planning Policy for Waste (2014), both of which should be considered in conjunction with the NPPF.
- 2.22. The Levelling Up and Regeneration Act 2023 (LURA) received Royal Assent in October 2023. The LURA is a wide-ranging piece of legislation focussing mainly on local governance, planning reform and

regeneration / economic development, and therefore has key implications for local planning. Whilst some of its provisions are awaiting further Regulations or secondary legislation to bring them into force, the new plan-making system has been set by way of the Town and Country Planning (Local Planning) (England) Regulations 2026.

- 2.23. Notably, the LURA introduced the 'landscape duty', which primarily concerns the management and conservation of Protected Landscapes in England, which include National Parks and National Landscapes (formerly Areas of Outstanding Natural Beauty). This duty requires relevant authorities, such as local councils and planning authorities, to actively seek to further the statutory purpose(s) of these landscapes rather than merely having regard to them. This is significant given that some 83 per cent of Rother district is covered by the High Weald National Landscape.
- 2.24. The Government's Department for Transport (DfT) Circular 01/2022, Strategic Road Network and the Delivery of Sustainable Development advocates a new 'vision-led' approach to transport planning, which is now embedded in the NPPF (2024). The approach represents a departure from the 'predict and provide' model for transport planning, impact assessments and mitigations to the highway network. At its heart, the Circular seeks an integrated approach to transport and land-use planning, as well as place-making, with a focus on reducing car use and encouraging modal shift.
- 2.25. The Environment Act 2021 establishes a comprehensive legal framework for environmental protection in the UK, focusing on air quality, biodiversity, water resources, and waste management. The Act includes new environmental targets, requirements for habitat restoration and biodiversity net gain, along with provisions for waste reduction and management and improving water resources.

⁶ Under the transitional arrangements of the new planning system, the new Rother Local Plan will be assessed against the NPPF (December 2024).

The Act also introduces a strengthened ‘biodiversity duty’ which requires all public authorities in England to consider what they can do to conserve and enhance biodiversity. In December 2025, the Government published a revised Environmental Improvement Plan. This document provides a roadmap for improving the natural environment and, taking a multi-stakeholder approach, seeks to provide clarity on what, how and who will deliver the Government’s environmental ambitions.

- 2.26. The UK Marine Policy Statement (2019) is the framework for preparing Marine Plans and taking decisions affecting the marine environment, with the overarching aim of contributing to sustainable development in the United Kingdom marine area. The Guidance to the UK Marine Policy Statement, from 1 January 2020, explains how references to EU law should be interpreted following the UK withdrawal from the European Union. Within this framework, the South Inshore and Offshore Marine Plan is relevant to Rother district and the preparation of the Local Plan. It introduces a strategic approach to planning within the inshore and offshore waters between Folkestone in Kent and the river Dart in Devon.

Regional and local level

- 2.27. The East Sussex Waste and Minerals Local Plan comprises a series of documents which form part of the statutory development plan for Rother district. They are therefore significant in relation to the Local Plan. These documents include The East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan – Revised Policies (2024), and the Waste and Minerals Sites Plan (2017).
- 2.28. The East Sussex Local Transport Plan 4 2024-2050 (LTP4) was adopted in October 2024. Local Transport Plans are a requirement of the Transport Act 2000, which provides that such plans must set out both an overall strategy and implementation plans. Key changes to this latest version of the plan include an increased emphasis on climate change, the

need to decarbonise transport, and how the Covid-19 pandemic has impacted user needs and the way in which people choose to travel. Furthermore, transport accessibility, equity and inclusiveness, and the opportunities to support healthy lifestyles have become a priority for transport investment.

- 2.29. The East Sussex Climate Emergency Plan 2025-2030 and Climate Emergency Roadmap set out an evidence base, objectives and action plan to achieving the vision for East Sussex to be a net zero and climate resilient county. The documents support wider national policies and objectives around climate change mitigation and adaptation.
- 2.30. The Draft Local Nature Recovery Strategy for East Sussex and Brighton & Hove (2025) is an emerging document that is relevant to the Local Plan. Nature Recovery Strategies are new legal requirement arising from the Environment Act 2021. They are spatial strategies which, when adopted, will cover the whole of England, intended to drive more coordinated, practical and focused action on nature recovery, including biodiversity net gain.
- 2.31. The High Weald Area of Outstanding Natural Beauty (AONB) Management Plan 2024-2029 covers the extent of the High Weald National Landscape, large parts of which are situated in Rother district. The Plan is divided into two sections. The first describes the core components of natural beauty to be conserved and enhanced, along with key ambitions and proposed actions for stakeholders. The second section addresses the main drivers of change (or cross-cutting themes) affecting the High Weald, providing principles to underpin activities and a strategy for investment 2024-2029.
- 2.32. There are neighbouring authorities to Rother that have adopted or emerging Local Plans. These need to be considered during the preparation of Rother’s new Local Plan and the SA. This will help to ensure coordination on strategic, cross-boundary matters. As noted above, the Council is continuing to engage with neighbouring authorities through

the Duty to Cooperate. Key adopted plans include Ashford Local Plan (2019); Folkestone and Hythe Core Strategy Review (2022); Wealden District Core Strategy (2013); Tunbridge Wells Local Plan (2025); Hastings Planning Strategy (2014); Eastbourne Core Strategy (2013) and Eastbourne Borough Plan saved policies (2003); and Lewes District Core Strategy: Local Plan Part 1 (2016).

- 2.33. There are currently 9 made (adopted) Neighbourhood Plans in the district, which form part of the statutory development plan. These cover the following areas: Battle; Burwash; Crowhurst; Hurst Green; Peasmarsh; Rye; Saleshurst & Robertsbridge; Sedlescombe; and Ticehurst. The Neighbourhood Plans include policies which help to support the implementation of the strategic policies set out in the Local Plan.

Baseline information and key sustainability issues

- 2.34. The SEA Regulations provide that the environmental report should describe “the environmental characteristics of areas likely to be significantly affected”, and “the relevant aspects of the current state of the environment and the likely evolution thereof without the implementation of the plan or programme”.⁷
- 2.35. These requirements have been considered through the preparation of the SA/SEA Scoping Report (2021), which provided a detailed discussion on the environmental aspects of the district, as well as the social and economic situation within it (i.e., the baseline). This work was then updated in the Interim SA Reports (2024) and (2026). Taking this information into account, a range of key sustainability issues have been identified.
- 2.36. Following on from this assessment of the baseline situation and identification of sustainability issues, it is possible to make an

informed judgement on what the situation is likely to be, or how it may be expected to evolve, in the absence of the Local Plan. The outcomes of this exercise are provided in **Figure 3** below, which has been reviewed and updated from the SA/SEA Scoping Report (2021).

The SA Framework

- 2.37. The creation of the SA Framework is one of the key outcomes of Stage A of the SA process. It is the tool that is used to assess the emerging plan policies against environmental, economic and social sustainability objectives.
- 2.38. The SA Framework for the new Local Plan was presented in the SA/SEA Scoping Report (2021). This set out 20 key sustainability objectives against which the emerging Local Plan policies are to be appraised. A series of decision-aiding questions have been devised for each SA Objective in order to facilitate the appraisal process. Each question is intended to be considered in order to identify:
- The nature the principal impacts (effects) of the policy proposal or reasonable alternative option (e.g., whether positive or negative);
 - How these impacts may change over time;
 - The relative magnitude of the impacts.⁸
- 2.39. The final point, referring to magnitude, serves as an initial proxy for identifying the relative significance of the impacts. This exercise also provides an initial opportunity to identify potential cumulative and synergistic impacts and to consider appropriate mitigation measures.
- 2.40. Whether an effect is considered likely to be significant will depend on whether it has a

⁷ SEA Regulations, Schedule 2(3) and 2(2).

⁸ These effects cannot always be determined definitively at the plan-making stage. However, the questions provide

a useful and informed means of assessing ‘likely’ or ‘predicted’ impacts of plan proposals in line with the SEA Regulations.

material impact on an SA Objective. The effects may be judged according to:

- Probability, duration, frequency and reversibility of the effects;
- Cumulative nature of the effects;
- Trans-boundary nature of the effects;
- Risks to human health or the environment;
- Magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
- Value and vulnerability of the area likely to be affected due to special natural characteristics or cultural heritage; exceeded environmental quality standards or limit values; intensive land use; or effects on areas having a recognised national, Community or international protection status; and
- How they contribute to achieving or restrict the achievement of the various elements of the SA Objectives.

Figure 3: Key sustainability issues for the Local Plan

Key sustainability issue	Likely evolution without the Local Plan
Air quality	
- New development has the potential to lead to increase in air quality impacts from increased traffic generation and movements, unless a modal shift away from car use to sustainable transport (including active travel) measures is achieved. - Decarbonisation and the links to air quality and transport in general is a key issue, including the role that transport must play in reducing carbon emissions. - Technological improvements are likely to have an impact on air quality levels over the long term, which may support improvements in air quality, e.g. ultra-low emission vehicles, sustainable design and construction.	Potential to realise only incremental or no improvement in air quality levels or an increase of the current baseline levels of pollution.
Biodiversity	
- Development has the potential to adversely impact on biodiversity and environmental designations, e.g. Local Wildlife Sites in Rother District. - The need to protect and enhance networks of blue green infrastructure, including by improving habitat connectivity, together with delivering Biodiversity Net Gain. - The need to appropriately manage development to ensure no significant adverse impact on nationally and internationally designated nature sites, coastal areas and the High Weald National Landscape.	Potential to adversely impact on habitats and species, including sites that are designated for their environmental importance. Limited scope for achieving Biodiversity Net Gain.
Energy and water consumption	
- New development has the potential to increase energy consumption. - Domestic water consumption per capita is above national targets.	Potential to maintain or increase levels of energy and water use and consumption, particularly in domestic buildings.
Climate, flooding and coastal change	
- Water run-off from development / surface water flooding and wastewater management. - Coastal erosion has the potential to impact existing properties and future development - the coastal defence strategy is important for this issue moving forward. - The need to ensure new development is located to those areas at least risk of flooding from all sources, and to ensure new development does not increase risk of flooding in the district and beyond. - Need to reduce the risk of flooding from all sources, taking account of the impacts of climate change.	Development may be directed inappropriate locations, such as those vulnerable to flood risk or coastal erosion. Increased risk of flooding from all sources, including surface water flooding, associated with new developments and urbanisation, and/or the cumulative impact of the loss of permeable surfaces across the area.
Population, health and wellbeing	

Key sustainability issue	Likely evolution without the Local Plan
- Ageing population in Rother and associated needs for health and social care. - Obesity and associated health impacts, particularly in young children. - Widening gap between wages and property values, worsening access to the property markets and increasing homelessness figures in areas of the district. - Crime and perceptions of safety. - Overall level of deprivation in the district and particularly in more deprived areas.	Lack of availability of housing to meet the wide range of local housing needs, including access to affordable housing and specialist accommodation. Potential worsening of deprivation and inequality in the district, including health inequalities. Potential for a lack of adequate services and community facilities to meet the needs of new developments and a growing population.
Heritage	
- Scoping suggests no specific historic environment conservation issues at the strategic level. Rather, there are issues in relation to specific buildings and other heritage assets, whose significance may be comprised without effective development management. - There may be opportunities to make heritage assets more accessible and sustainable.	New development has the potential to adversely impact on the significance of heritage assets and their setting.
Land and water quality	
- Increase in general household waste, with links to decrease in domestic recycling. - Changes in bathing water quality across the district. - Emerging local policies should address brownfield sites, groundwater protection and key infrastructure development relating to surface water and foul water drainage. - Changes in the ecological status of relevant waterbodies as a potential result of development, to be measured against the requirements of the Water Framework Directive.	Increase in waste generation and waste management requirements associated with new development. Increased pressure on the water and wastewater network, which could lead to capacity and servicing issues. Potential deterioration in the ecological status of waterbodies.
Natural landscape	
A significant proportion of Rother District is located within the High Weald National Landscape, which is statutorily protected.	Inappropriately located and designed development, with potential harm to the National Landscape, or other landscape character settings.
Skills, employment and economic development	
Economic performance of business is showing signs of improvement since Covid; however, there are still high levels of the population that are economically inactive and with no or lower qualifications.	Economic development could be inhibited in the absence of a sufficient amount and availability of good quality of business space. Lack of access to community facilities (including for education and training) could have an adverse impact on local labour supply.
Transport	

Key sustainability issue	Likely evolution without the Local Plan
- There is a high dependency on the private car for travel movements, especially in rural locations. - Reduction in levels of walking in Rother.	Continued reliance on the car, and less take-up of modal shift, with negative implications for air quality, carbon reduction and public health.

Figure 4: Sustainability Appraisal Framework for the Rother Local Plan

SA Theme	SA objective	Appraisal questions: will the option/proposal help to...
Air Quality	1. Reduce air pollution from transport and development and improve air quality.	- Improve air quality? - Avoid locating development where air quality could negatively impact upon people's health? - Reduce the amount of Air Quality Management Areas? - Does it support the take up of low or ultra-low emission vehicles?
Biodiversity	2. Biodiversity is protected, conserved and enhanced.	- Protect and enhance sites designated for their nature conservation interests? - Protect, conserve and enhance priority species and habitats, and increase local biodiversity? - Achieve a net gain in biodiversity? - Protect and enhance ecological networks?
Energy and Water Consumption	3. The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation)	- Reduce energy consumption? - Reduce CO2 to contribute to identified national targets? - Lead to efficient land use patterns that minimise the need to travel? - Lead to more sustainable travel including walking, cycling and public transport? - Does it enable the take up of low or ultra-low emission vehicles?
Energy and Water Consumption	4. Minimise water consumption.	- Reduce water consumption? - Increase the use of water conservation and greywater recycling technologies? - Ensure water demand does not outstrip available supply?
Climate Change Adaptation, Flooding and Coastal Change	5. Manage and reduce the risk of flooding (fluvial, tidal and surface water), now and in the future, and increase resilience to the wider effects of climate change.	- Reduce the risk of flooding from rivers, watercourses and the coast to people and property? - Reduce the risk of surface water flooding? - Ensure that development does not increase flood risk to others? - Prevent inappropriate development in the flood plain? - Improve and extend green infrastructure networks? - Increase the resilience of the built and natural environment to the effects of climate change?
Climate Change Adaptation, Flooding and Coastal Change	6. The risk of coastal erosion is managed and reduced, now and in the future.	- Protect land stability in designated vulnerable areas? - Protect coastal areas from deterioration?
Population Health and Wellbeing	7. The health and well-being of the population is improved and inequalities in health are reduced.	- Reduce levels of childhood obesity? Reduce death rates? - Promote healthy living and active lifestyles? - Reduce health inequalities? - Improve access to high quality health facilities?

SA Theme	SA objective	Appraisal questions: will the option/proposal help to...
Population Health and Wellbeing	8. More opportunities are provided for everyone to live in a suitable home to meet their needs.	• Improve the quality of the housing stock and reduce the number of non-decent homes? • Reduce homelessness and ensure the provision of housing for the homeless? • Encourage housing types that meet local needs?
Population Health and Wellbeing	9. All sectors of the community have improved accessibility to services, facilities, jobs, and social and cultural opportunities.	• Improve accessibility and affordability to essential local services (employment, public transport, education, space, health services and shops)? • Promote compact development with good accessibility to local facilities and services? • Make access easier for those without a car? • Improve residential amenity and sense of place?
Population Health and Wellbeing	10. Safe and secure environments are created and there is a reduction in crime and fear of crime.	• Reduce actual levels of crime? • Reduce the fear of crime?
Heritage	11. Historic environment/ townscape is protected, enhanced and made more accessible.	• Protect, enhance and restore heritage assets? • Reduce the number of buildings at risk? • Encourage access to historic and cultural heritage? • Support the undertaking of archaeological investigations and, where appropriate, recommend mitigation strategies? • Conserve and enhance archaeological remains, including those contributing to historic landscapes and townscapes?
Land and Water Quality	12. The risk of pollution to land and soils is reduced and quality is improved.	• Reduce land contamination? • Minimise development on the best and most versatile agricultural land?
Land and Water Quality	13. Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced.	• Minimise the production of household waste? • Reduce waste in the construction industry?
Land and Water Quality	14. The risk of pollution to water is reduced and water quality is improved.	• Avoid water pollution due to contaminated runoff from development? • Support improvements to water quality consistent with the aims of the Water Framework Directive?
Natural Landscape	15. Ensure that Parks, gardens and countryside are protected, enhanced and made more accessible.	• Conserve and enhance the High Weald National Landscape in line with the aims and objectives of the 2024-2029 Management Plan, and Protected Landscapes duty? • Protect and enhance the natural environment? • Encourage access to the natural environment (including parks, open spaces, recreational opportunities and the coast)? • Protect sensitive and special landscapes?
Skills, Employment and Economic Development	16. Economic performance is improved.	• Improve economic performance?

SA Theme	SA objective	Appraisal questions: will the option/proposal help to...
Skills, Employment and Economic Development	17. There are high and stable levels of employment and diverse employment opportunities for all.	• Reduce short and long-term unemployment? • Help to improve earnings? • Increase the number and range of employment opportunities?
Skills, Employment and Economic Development	18. Levels of poverty and social exclusion are reduced, and the deprivation gap is closed in the more deprived areas.	• Reduce poverty and social exclusion in those areas and communities most affected? • Reduce gap between least and most deprived areas?
Skills, Employment and Economic Development	19. Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve.	• Improve the qualifications and skills of young people? • Improve the qualifications and skills of adults? • Address the skills gap and enable skills progression? • Contribute to meeting identified skills shortages? • Improve access to high quality educational/training opportunities and facilities?
Transport	20. Road congestion levels are reduced and there is less car dependency and greater travel choice.	• Reduce the need to travel by private car? • Enable more sustainable transport patterns including walking, cycling and public transport? • Reduce the need to travel by car through the location and design of new development and places which provide more opportunities for active travel and for the provision and link to public transport infrastructure? • Reduce road traffic accidents?

Compatibility of the SA Objectives

- 2.41. One of the difficulties encountered when undertaking the SA is that objectives themselves may, to some extent at least, be inherently incompatible. The potential for conflicts may arise particularly around the use land, and priorities for different types of development when these are considered against objectives for environmental management, including nature conservation.
- 2.42. Highlighting these potential conflicts or inconsistencies between the sustainability objectives allows the SA Framework to try to balance these issues or determine where the priorities should lie. Where possible, a mutually beneficial or compromise solution should be sought.
- 2.43. **Figure 5** shows the assessment of compatibility and potential conflicts between the Sustainability Objectives listed in the SA Framework above, with a key provided for the scoring used.

Key findings

- 2.44. Overall, the assessment does not point to significant concerns with the compatibility of the SA Objectives. Many of the objectives are compatible with one another or score an assessment of neutral.
- 2.45. There are potential for conflicts or incompatibilities with Objective 8 (“More opportunities are provided for everyone to live in a suitable home to meet their needs”). The objective is focussed mainly on social sustainability issues, and to address these it generally necessitates the development of more housing to meet the wide range of local needs. Significant new development for housing has the potential to compromise or conflict with objectives for waste minimisation and management (Objective 13) and sustainable transport, in so far as reducing car use and dependency (Objective 20).

- 2.46. There are a number of SA Objectives where compatibility is neutral or unknown. This is largely owing to uncertainties, at the SA Scoping Stage, around the exact nature and location of development that will be facilitated by the Local Plan. Also, there is certainly a potential for new development to be incompatible with objectives around nature conservation and protecting the National Landscape, however there are legal and national policy requirements for these areas that will work together with the Local Plan. Further, new high-quality development that is appropriately located and designed can help to ensure any potential impacts are mitigated or indeed avoided altogether.

Figure 5: Compatibility of SA Objectives

Key: Green – Positive (+) relationship, Amber – Neutral relationship (o), Red – Negative relationship (-)

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
1		+	+	+	+	+	+	o	o	o	o	+	o	+	+	o	o	o	o	+
2			+	o	o	o	o	o	o	o	o	+	o	o	+	o	o	o	o	o
3				+	+	+	+	o	o	o	o	+	+	+	+	o	o	o	o	+
4					o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
5						+	o	+	o	o	+	+	o	+	o	o	o	o	o	o
6							o	o	o	o	+	o	o	o	o	o	o	o	o	o
7								+	+	+	o	+	o	+	+	+	+	+	+	+
8									+	+	o	o	-	o	o	o	o	o	o	-
9										o	o	o	o	o	o	+	+	+	+	o
10											o	o	o	o	o	o	o	o	o	o
11												o	o	o	o	o	o	o	o	o
12													o	+	o	o	o	o	o	o
13														o	o	o	o	o	o	o
14															o	o	o	o	o	o
15																o	o	o	o	o
16																	+	+	+	o
17																		+	+	o
18																			+	o
19																				o
20																				

Chapter 3:

Method

This section discusses the methodology used for the Sustainability Appraisal of the Rother Local Plan.

- 3.1. This section of the report provides details of the methodology used for undertaking the SA of the Rother Local Plan, looking at the five key stages of the appraisal set out in the previous chapter.

Stage A: Scoping

- 3.2. The process for completing the Stage A Scoping work, and the outputs of this, is discussed above in Chapter 2 of this report. This has culminated in the setting of the SA Framework against which the emerging Local Plan policy options (including preferred approaches) have been assessed.

Stage B: Developing and refining alternatives and assessing effects

Background

- 3.3. The SEA Regulations require that the SA Report should identify, describe and evaluate the likely significant effects on the environment, both in terms of implementation of the Local Plan (and its policies), along with other reasonable alternatives considered during the preparation of the plan, taking account of the objectives and geographical scope of the plan.⁹ For the purposes of the SA, this is broadened to include consideration of the environment as well as social and economic effects, in line with the NPPF¹⁰ and the associated PPG.
- 3.4. Developing reasonable alternatives (policy options) for the Local Plan is an iterative process. It typically involves front-loading of work by the Council (including production of the technical evidence base, deciding on the key issues for the plan, and approaches to addressing these). This early-stage work is informed by informal engagement and formal public consultation with statutory bodies, along with other key stakeholders and the wider public. Public consultation is an integral part of the plan-making and SA process. Feedback received can assist in

identifying reasonable alternatives for the plan policies and further inform the selection of preferred approaches.

- 3.5. It is important for the Council, through the SA Report, to make clear why and how the reasonable alternatives were selected. As well, the alternatives should be decidedly distinct so to enable meaningful comparisons between these through the SA process. It is important to note that not all potential policy alternatives for the Local Plan necessarily need to be considered and appraised. The emphasis should be on 'reasonable' alternatives that can feasibly and realistically be implemented, given local circumstances.
- 3.6. The development and appraisal of policy alternatives is intended to be undertaken as an iterative process during the preparation of the Local Plan. As noted above, public consultation is a key consideration during this process, and it is therefore important that the SA runs in parallel with plan production. However, public consultation feedback is not the only consideration for plan-making. Indeed, the Local Plan must respond to a wide range of factors including planning legislation, national and regional planning policy, technical evidence and plan deliverability considerations, including development viability.

Assessing the reasonable alternatives

- 3.7. This SA report includes detailed assessments of the options for the Development Strategy and site allocation policies considered during the preparation of the draft Rother Local Plan. This includes the preferred options (or approaches) as well as the reasonable alternatives that have been discounted at this stage in the plan process.
- 3.8. It is noted that the Council has prepared a number of 'Background Papers' that form part of the Local Plan evidence base. These are broadly set out by thematic policy topic area. The Background Papers provide an audit trail

⁹ SEA Regulations, Regulation 12(2).

¹⁰ NPPF (December 2024), paragraph 33.

of the policy preparation. They help to justify the selection and decision of preferred policy approaches in the Local Plan, including the spatial Development Strategy for the district, and also explain why some options were not considered or if they discounted at various stages in the plan process. The SA is an important consideration in this regard.

- 3.9. The assessments are primarily set out in tables that provide a comparative summary of findings for the policy options against the SA framework. This helps to identify potential or likely 'significant' effects, including consideration of short-term to long-term impacts and synergies with other policies and programmes, including but not limited to those in the Local Plan.
- 3.10. Policy options have been assessed using the SA Framework, set out earlier in this report. This identifies 20 sustainability objectives and includes key questions to assist with the appraisal of the options against these objectives. Scores are then assigned to the policy options considering their likely effects, using the 'scoring key' set out below.
- 3.11. In addition, the SA then considers cumulative and synergistic effects of the policy options (factors that may interact in a synergistic way and may increase cumulative affects either positively or negatively), as well as potential mitigation measures (to mitigate or avoid negative effects and enhance positive effects). The tool used for this second part of the appraisal is set out in **Figure 6**.
- 3.12. A bespoke methodology has been used for the SA of the site allocation policies and reasonable alternatives. This builds on the methodology discussed here and indeed aligns with it. The main reason for using this methodology for the sites is to assist with providing an 'objective' assessment based on individual site circumstances and constraints. This is discussed in detail in Chapter 6.

Appraisal scoring

- 3.13. The Local Plan approaches and policy proposals are being assessed against the 20 SA Objectives, as set out in the SA/SEA Scoping Report and associated SA Framework.
- 3.14. A scoring key has been devised to assist with the assessment. This categorises findings using a symbol and colour code, which indicates the likely potential effects of the Local Plan policy proposal (including reasonable alternatives). The scoring key is particularly useful for presentation purposes, as it provides an overview of scoring against the environmental, social and economic SA objectives. The scoring is supplemented by supporting text explaining key outcomes of the assessment.
- 3.15. The SA scoring key is set out in **Figure 7**.

Figure 6: Method for assessing development options, synergies and mitigation

1. Does this have a <u>significant</u> effect on the SA objective, whether positive or negative? (See also the baseline indicators and prompt question)	2. What is the likely Impact ?			3. Is this a temporary or permanent Impact?	4. Is this a short term or long term impact?	5. Are there synergies between other <u>policies</u> (or options) which might amplify the effect?	6. Commentary/Notes
State Y/N	Negative (-1)	Neutral (0)	Positive (1)	State T or P	State ST or LT	State Y or N	Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score
Policy A							
Policy B (etc)							

Figure 7: SA scoring key

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

Stage C: Preparing the SA Report

- 3.16. This Sustainability Appraisal Report (i.e., the 'Environmental Report' required by the SEA Regulations) has been prepared for and published at the Regulation 19 stage of the plan process. This is when the 'Proposed Submission' version of the Local Plan is issued for a statutory public consultation.
- 3.17. The SA Report sets out the process that has been undertaken in carrying out the SA of the Rother Local Plan. It also discusses the Council's reasons for selecting the preferred policy approaches and reasonable alternatives during the preparation of the plan. The focus of the appraisal is on the identification of likely significant effects of implementing the Local Plan, in accordance with the SEA Regulations. This includes consideration of cumulative and synergistic effects over a range of time periods (short, medium and long-term), and whether these effects are anticipated to be permanent and/or temporary.
- 3.18. This SA Report has been informed by and builds upon the Interim Sustainability Appraisal Reports prepared and published during the Regulation 18 stage of the plan process, in 2024 and 2026 respectively.

Stage D: Consultation on the draft Local Plan and SA Report

- 3.19. This section of the SA report discusses consultation requirements for the SA and also provides an overview of consultation activities undertaken to-date.

The Statutory Environmental Bodies

- 3.20. Regulation 4 of the SEA Regulations defines certain organisations with environmental responsibilities as consultation bodies. In England the consultation bodies (or statutory environmental bodies) for the purposes of the

SA are the Environment Agency, Historic England and Natural England.

Consultation on the SA/SEA Scoping Report

- 3.21. As noted earlier in this report, Rother District Council worked jointly with Hastings Borough Council to prepare a joint SA/SEA Scoping Report for their respective Local Plans. The statutory environmental bodies were consulted on the draft SA/SEA Scoping Report, from 17th April to 29th May 2020.
- 3.22. Whilst not legally required to, the Council also invited comments on the draft SA/SEA Scoping Report from selected organisations and stakeholders, as listed below:
- East Sussex County Council;
 - East Sussex NHS Clinical Commission Group;
 - Sport England;
 - Highways England;
 - Marine Management Organisation;
 - South East Coastal Group; and
 - Neighbouring authorities: Tunbridge Wells Borough Council, Ashford Borough Council, Wealden District Council and Folkestone and Hythe District Council.
- 3.23. Appendix A to the SA/SEA Scoping Report (2021) provides details of the responses received to the consultation. In response to feedback received the SA Framework was amended, the updated version of which was included in the final SA/SEA Scoping Report (2021).¹¹

¹¹ The SA/SEA Scoping Report was made available on the Council's website in Summer 2020.

Consultation on the Interim and Final SA Reports for the Rother Local Plan

- 3.24. Whilst consultation on the SA/SEA Scoping Report is limited to the statutory environmental bodies, the legal requirements for consulting on interim Sustainability Appraisal reports is more extensive.
- 3.25. For Stage D in the SA process, the Council is required to consult the environmental consultation bodies as well as other parties who, in its opinion, are affected or likely to be affected by, or have an interest in, the decisions involved in the assessment and adoption or making of the plan. Further details on consultation procedures are set out in Regulation 13 of the SEA Regulations.
- 3.26. The Government's PPG also sets out that the Council, in its capacity as local planning authority, may also seek to consult those they are inviting representations from as part of the development of the Local Plan itself. Therefore, consultation has been undertaken as part of Stage B in the SA process, in advance of the preparation and consultation on this final SA Report as part of Stage D.

Regulation 18 consultation on the draft Rother Local Plan 2020-2040 (April to July 2024)

- 3.27. The Council carried out a Regulation 18 stage public consultation on the draft Rother Local Plan 2020-2040, from 30th April to 23rd July 2024. During that time, the Council also published and consulted on a corresponding Interim Sustainability Appraisal (including a Non-Technical Summary) (April 2024). A Habitats Regulations Assessment Screening Report was also published for consultation.
- 3.28. Representations received to the consultation on the Interim Sustainability Appraisal report are set out in **Appendix 7** of this report.

Regulation 18 consultation on the draft Rother Local Plan 2025-2042 – Development Strategy and Site Allocations (January to March 2026).

- 3.29. The Council undertook a further Regulation 18 stage consultation, on the Draft Rother Local Plan 2025-2042 – Development Strategy and Site Allocations document (2026) from 26th January to 23rd March 2026. The associated Interim Sustainability Appraisal report (January 2026) was also published for public consultation at that time.
- 3.30. Representations received to the consultation on the Interim Sustainability Appraisal Report (2026) are set out in **Appendix 7** of this report.

Regulation 19 consultation on the draft Rother Local Plan – Proposed Submission document

- 3.31. This final Sustainability Appraisal Report has been prepared and published for consultation at the Regulation 19 stage of the plan process, as set out above.

Stage E: Monitoring

- 3.32. The SEA Regulations set out requirements with respect to monitoring of the implementation of the Local Plan. Specifically, the requirement is monitor “the significant environmental effects of the implementation of each plan or program with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake remedial action”¹².
- 3.33. Indicators have been established to monitor the implementation of the Local Plan, informed by work on the SA. This SA Report include suggested indicators for monitoring, in line with the statutory requirements, at Chapter 7.
- 3.34. It is noted that the Council currently monitors the implementation of the extant Local Plan through the Authority Monitoring Report (AMR), which it is required to prepare at least annually. The Council will explore

¹² SEA Regulations, Regulation 17(1).

opportunities to integrate SA monitoring of the new Local Plan through the AMR process.

Health Impact Assessment

3.35. As noted above, the Council's approach to SA integrates a Health Impact Assessment (HIA). The Council has worked closely with the Healthy Places team at East Sussex County Council on the SA approach. A key focus nationally, and supported at county level, is the need to assess the specific health impacts of proposed policies through a Health Impact Assessment. This builds on elements of health and wellbeing that are assessed as part of the SA process itself, but it has been considered appropriate to undertake an additional HIA assessment in two parts, as set out below and detailed in **Figure 8** below:

- Part 1: Screening – to assess if there are clear health and wellbeing impacts of the proposed policies
- Part 2: Full HIA criteria – detail what the impacts will be, considering the positive and negative and long term and temporary impacts.

3.36. This HIA process helps to ensure that health and wellbeing considerations are assessed widely across the Local Plan, and that linked benefits can be maximised. The HIA has been prepared for the Development (Spatial Strategy) as this sets the overarching strategic framework for the plan, which the remainder of the policies follow from.

Figure 8: Template for HIA

Ref	Question/criteria	Policy
HIA screening stage		
1.	Will the policy have a direct impact on health, mental health and wellbeing?	Yes/No
2.	Will the policy have an impact on social, economic and environmental living conditions that would indirectly affect health?	Yes/No
3.	Will the policy affect an individual's ability to improve their own health and wellbeing?	Yes/No
4.	Will there be a change in demand for or access to health and social care services?	Yes/No
Full HIA stage		
5.	What are the direct impacts on health, mental health and wellbeing? (e.g. ill health, social exclusion, isolation, non-participation, safety)	Yes/No
6.	What are the indirect impacts on health, mental health and wellbeing? (e.g. housing, transport, child development, education, employment opportunities, green space/nature, accessibility, air/noise/light quality and climate change adaption)	Yes/No
7.	What are the opportunities for self-improvement? (e.g. ability to be physically active, choose healthy food, access to services/employment/education)	Yes/No
8.	What change in demand for services will there be? (e.g. Primary Care, hospital care, community services, mental health, social services)	Yes/No
9.	What impacts will there be on planetary health? (e.g. climate change mitigation)	Yes/No
10.	Who will it effect, and will there be particular impacts on certain vulnerable groups? (e.g. older people, young, disabled, low income)	Yes/No
11.	How will negative impacts be mitigated?	Yes/No
12.	How will positive impacts be enhanced?	Yes/No
13.	Recommendations for policy changes.	Yes/No

Limitations and difficulties encountered

- 3.37. It is a requirement of the SEA Regulations that, when providing a description of how the assessment was undertaken, information is provided on any difficulties encountered in compiling the required information.
- 3.38. One of the key challenges in preparing the SA is that there is inevitably an element of 'subjectivity' brought into the assessment of reasonable alternatives for the Local Plan approaches and policies, as part of the professional judgements taken by those preparing the work. The SA Framework provides tools (such as clearly articulated objectives and guiding questions) to help ensure that the assessment can be made as 'objective' and transparent as reasonably possible. To further address this issue for the SA of the proposed site allocations and reasonable alternatives, the Council has prepared a bespoke 'template' to ensure a consistent approach to the site assessments, drawing extensively on Geographical Information System (GIS) mapping. The methodology is discussed in further detail in Chapter 5 of this report.
- 3.39. A limitation in undertaking the assessments for site allocations using the 'template', was that some of the SA objectives were screened out, and therefore not all 20 SA objectives were scored in detail on the individual site assessments. There were two main reasons for this screening. First, in some cases, there are 'development management policies' or Building Regulations which deal with planning matters associated with an objective (such as for water efficiency or safety/security), so the site assessment is negligible. Second, in other cases, it is difficult to make meaningful assessments or comparisons between proposed site allocations for some objectives (such as reducing poverty or access to education/training), as these are captured by other Local Plan policies. Further details of

the reasons for screening out SA objectives are included in the template at **Appendix 5**.

- 3.40. Another key challenge in preparing the SA is to assess proposed policy approaches or options independently, and in the absence of how they might function in combination with other policies in the Local Plan. For example, site allocations (proposed sites for new development) may by themselves have potential negative impacts on some of the SA objectives; however, these impacts can be avoided or mitigated through other policies in the plan, such as 'development management' style policies or indeed site-specific development requirements or guidelines. This SA broadly takes a 'policy off' approach to the SA in the first instance, so to consider policy options by themselves and independent of other policies, plans or programmes. This is then supplemented by a more rounded assessment of cumulative and synergistic impacts, in accordance with the legal requirements. Mitigation measures can then be recommended by the SA, which can be considered during the plan-making process, and as part of the iterative process of SA.
- 3.41. The SA takes account of and is based on the available information at the time it is being prepared. It is acknowledged that the collection and analysis of baseline data is a continual process, as information can be updated or change on a regular basis. The approach taken for this SA is to consider the reports collectively, with focussed updates to baseline information and cross-referencing of earlier reports (such as the SA Scoping Report and Interim SA Reports). This helps to avoid unnecessary duplication of information.
- 3.42. The amount of information included as the baseline needs to be proportionate and relevant to the exercise, and in line with the legal requirements. It is acknowledged that there may be instances where there are data gaps on particular topic areas, or some baseline information may not be cited or the latest available. The Council has sought to address this issue, and rectify instances

where possible, through public consultation on the SA including with the statutory environmental bodies.

Chapter 4:

Development strategy and growth scenarios

This section discusses the preparation and Sustainability Appraisal of the Development Strategy for Rother, including growth scenarios considered through the appraisal of residential density options. The section also covers the ‘visions’ for the five geographic sub-areas of the district set out in the Local Plan, which help give effect to the Development Strategy.

Introduction

- 4.1. One of the key components of a Local Plan is a 'Development Strategy' (also referred to as a 'Spatial Strategy'). This sets out the overall pattern or distribution of future growth and development across a geographic area. It is also often referred to as a spatial strategy. The Development Strategy may also include an indication of the amount of new development expected to be delivered within this overall pattern of growth, considering local needs such as for housing and business space.
- 4.2. The Rother Local Plan includes a Development Strategy for the district. The strategy has been developed and refined by the Council during the preparation of the Plan, considering reasonable alternatives and interim appraisals through the SA process, which this chapter explores in further detail.

Policy context

- 4.3. The NPPF intends for the planning system to be genuinely plan-led. Local plans, therefore, should provide "a positive vision for the future of an area, and a framework for meeting housing needs and addressing other economic, social and environmental priorities".¹³ The Development Strategy for the Local Plan sets out how this will be achieved for the district, including approaches to coordinating and carefully managing new development across Rother.
- 4.4. Furthermore, the NPPF stipulates that the national 'standard method' should be used to assess the minimum amount of housing required in an area. This takes existing housing stock estimates and applies an upward adjustment based on the affordability characteristics of the area.¹⁴
- 4.5. The Development Strategy is set in the context of Rother's development needs and

how these will be addressed. It responds to the number of new homes, amount of new employment land and floorspace, and space for other business needs (such as in town centres) that is expected to come forward over the plan period. The Development Strategy also sets out the approach to distributing this growth to ensure it happens in a sustainable way, including by identifying the main locations where new development and necessary supporting infrastructure will be directed to.

SA of the initial Development Strategy options for the draft Local Plan (2024)

- 4.6. At the time of the first Regulation 18 consultation on the draft Rother Local Plan in summer 2024, the Government's standard method yielded a Local Housing Need (LHN) figure for the district of 733 net new homes per year.¹⁵
- 4.7. Local needs for economic development were also identified by the Council through its evidence base. The Housing and Economic Development Needs Assessment (2024) indicated a need of circa 24 hectares, or 74,189 square metres, of employment floorspace over the period 2020-2040. The Rother Retail and Town Centre Uses Study (2023) indicated that there was very little need for new retail floorspace at the district level. This effectively meant that there was no additional need required to be accommodated.
- 4.8. Preliminary work undertaken by the Council, at that time, informed its early position that the Local Plan should seek to deliver a minimum of 5,158 to 7,287 net new dwellings, at an average rate of 258 to 364 new dwellings per year, as well as minimum of 74,189 square metres additional employment

¹³ National Planning Policy Framework, December 2024, paragraph 15.

¹⁴ National Planning Policy Framework, December 2024, paragraph 62.

¹⁵ The NPPF was subsequently updated in December 2024 along with changes to the standard method, which is discussed later in this chapter.

floorspace by the end of the Plan period in 2040.

- 4.9. The evidence base setting out identified development needs for the district was kept under review by the Council during the preparation of the plan, as discussed throughout this chapter.

Formulating the Development Strategy options

- 4.10. From the early stage of the plan process the Council has considered a wide range of options, or reasonable alternatives, for the Development Strategy. Further details on the process and considerations for formulating these options are set out the Development Strategy Background Paper, which forms part of the Local Plan evidence base, and should be referred to for further information. The following section provides a summary of the paper.

- 4.11. As part of the preparation of the draft Local Plan (2024), the formulation of Development Strategy options was undertaken by the Council with reference to the evidence base, and considered the following factors:

- The existing distribution of settlements across the district and their scale and importance;
- The district's transport network and the connectivity and interaction between settlements in relation to accessing services and facilities;
- The development potential outside the High Weald National Landscape;
- Opportunities for new settlements, or significant extensions to existing settlements; and
- Opportunities for development on the edge of the district boundary where it is close or adjacent to other settlements.

- 4.12. The starting point for considering options was the existing distribution of settlements across

the district. On this basis, there was potential scope for a Development Strategy linked to the current size, form and function of each settlement and their potential to grow in line with past trends. This led to two 'in-principle' options which based on directing proportional growth:

- i. According to the existing population of settlements – in this way existing large settlements would continue to grow at higher rates, and smaller settlements would only have limited growth; and
- ii. According to the form and function of each settlement – through establishing a hierarchy where each settlement is defined as a large town, smaller town, larger village, etc. and the level of growth is based on the hierarchy.

- 4.13. The next set of options related to the interaction of communities between settlements across the district. These options were premised on the proximity of settlements to neighbouring ones, along with their relationships in terms of provision of services and facilities and transport networks and connections (including potential improvements to transport). Two 'in-principle' options were set out, as follows:

- i. Village Clusters – enhanced connections between existing villages to create clusters of connected settlements, supported by growth. In particular, two potential clusters centred around Rye and Battle; and
- ii. Radial Settlement Connections to Bexhill and Hastings – focussing growth in settlements that are served radially by the three larger towns of Bexhill, Battle and Hastings, with improved sustainable transport connections;

- 4.14. The next consideration centred on the growth of existing settlements through brownfield land development and intensification, together with greenfield development and growth at the edge of the existing settlements. Specifically, this considered the

opportunities for significant growth in the North and West Bexhill area, as Bexhill is the district's largest settlement and a key area of search. This provided for four 'in-principle' options, as follows:

- i. Sustainable Settlement Growth – focussing new development on the edge of identified sustainable settlements (informed by the Council's Settlement Study), and extending settlement boundaries where appropriate;
- ii. Bexhill Greenfield Growth – focussing development in sustainable locations on the edge of North and West Bexhill, with sub-options to take this forward both with and without a new multimodal between the A259 and the A2691 (Haven Brook Avenue);
- iii. Hastings Fringes Urban Growth – focussing development on the edge of Hastings (on land within Rother District), adjoining the built-up boundary; and
- iv. Brownfield intensification and redevelopment – directing development within the existing areas of built form of sustainable settlements, primarily on brownfield land and at higher densities.

4.15. Consideration was also given to the opportunities for new development along transport corridors, or in areas located near to sustainable transport options, such as train stations and bus routes. This provided for two 'in-principle' options, as follows:

- i. Growth in settlements with train stations or sustainable transport alternatives – focussing development within locations and settlements close to train stations that act as a sustainable transport hub, and linkage to bus services;
- ii. A21 Corridor growth - focussing development along the A21 within an identified corridor of settlements, with opportunities for sustainable growth,

together with enhanced provision of sustainable travel by enhanced bus services and cycling provision along the corridor.

4.16. Finally, two 'in-principle' options were considered for development outside of the defined High Weald National Landscape (formerly referred to as Area of Outstanding Natural Beauty), as follows:

- i. Development focused outside the National Landscape - concentrate new development only in locations outside the National Landscape, which necessarily comprised a southern, coastal focused strategy centred around Bexhill and Rye;
- ii. New rural settlement(s) – An individual or a number of new settlements with their own facilities and services and necessary infrastructure.

4.17. The options listed above were considered to inform the Development Strategy included in the draft Local Plan (2024). At that time, the Council first considered these 'in-principle' options on their own merits, in isolation of the other options. However, it was also recognised it would be appropriate to also consider synergies between options and the opportunities for them to be combined to form the most appropriate and sustainable strategy for the district.

4.18. It is important to note that the Council was clear that some of the options required further understanding and consideration of findings from the HELAA process. This was particularly as some options could only be feasibly delivered with a sufficient supply and land and sites that were "suitable, available, and achievable". Nevertheless, at the early stage of the plan process, it was considered appropriate to identify and explore the merits of these options and to assess them through the SA, whilst recognising that further work on the HELAA would be undertaken.

4.19. The Draft Local Plan (2024) and Interim SA Report (2024) considered development management style policies (and policy areas) under the ‘Development Principles’ section of the documents, two of which are relevant here – DEV3: Development Boundaries and DEV6: Strategic Green Gaps. These are not necessarily spatial options for the Development Strategy, but the policies ultimately help give effect to it. They have been flagged here for reference. The initial appraisal of the options is set out in **Appendix 4** of this report. The strategic spatial consideration of development boundaries and green gaps has been set out previously in this section.

Appraisal of the Development Strategy options

4.20. The SA of the initial Development Strategy options is set out in **Figure 9** and **Figure 10** below. This has been duplicated from the Interim Sustainability Appraisal (2024). It is included here for information and to aid reading of the subsequent section of this report, which deals with the SA of the draft Rother Local Plan – Development Strategy and Site Allocations (2026), and the Regulation 19 version of the Rother Local Plan.

4.21. The appraisal of the initial options informed the Council’s selection of a ‘preferred option’ for the Development Strategy, which comprised a combination of the options. The preferred option was then set out in the draft Rother Local Plan (2024) as the “Proposed Strategy: Overall Spatial Development Strategy” and subject to public consultation.

4.22. The preferred option comprised the following options (with details of the corresponding reference numbers for the options):

- Bexhill Greenfield Growth (without new multi-modal transport corridor, to be confirmed) (SDO3A);
- Radial Settlement Network from the main urban areas of Bexhill and Hastings (SDO2);
- Village Clusters with growth in settlements with train stations or sustainable transport alternatives (SDO1, SDO11)¹⁶;
- Sustainable settlement growth, with focus along the A21 Corridor (SDO4, SDO10);
- Hastings fringes urban growth (SDO5); and
- Brownfield Intensification and Redevelopment (SDO6).

4.23. The overall conclusion of the SA, as well as the Council’s reason for progressing with the preferred option(s), at the time, was set out in the SA report. An excerpt is set out below.

Excerpt from Interim SA (2024)

“The sustainability appraisal of the proposed development strategy demonstrates that the combination of options together is sustainable. The development strategy cannot in isolation result in significant environmental improvement across the District, but supportive policies to ensure the Local Plan meets its ‘green to the core’ and ‘live well locally’ Overall Priorities is in line with the Council’s Local Plan vision and objectives. The Bexhill green growth options cannot come forward together, as one of the options is dependent on the longer-term delivery of a multi-modal sustainable transport corridor and one is not. Therefore, at this moment in time, based on feasibility and deliverability within the plan period the proposed strategy does not involve the delivery of a new multi-modal corridor. Whilst a new sustainable transport corridor has been assessed as one of the most sustainable options, it is not considered deliverable within the

¹⁶ Note that the draft Rother Local Plan (2024) did not indicate that option SD11 was taken forward as a preferred approach due to an editorial error.

timeframe of the Local Plan to 2040 and therefore cannot progress as part of the development strategy. The proposed strategy has included radial settlement networks from the main urban areas of Bexhill and Hastings, because although it scores the same as other discounted options, it is considered that this option could be delivered effectively alongside other options (sustainable settlement extensions, A21 corridor and town/village network clusters for example). It should be noted that the A21 corridor option alone does not provide a strategy for significantly uplifting the potential of development sites. Whilst it can be a focus for supporting sustainable sites, development would still need to be acceptable based on the environmental constraints and the setting of the High Weald national landscape.”

Figure 9: SA of the initial Development Strategy Options, as set out in the Interim Sustainability Appraisal (2024)

Spatial Development Options	Description/Vision	1 Air pollution	2 Biodiversity	3 Climate Change	4 Water Consumption	5 Flooding	6 Coastal Erosion	7 Health and Well-being	8 Housing	9 Accessibility to services	10 Safe Environments	11 Historic Environment	12 Pollution	13 Waste and Recycling	14 Water Pollution	15 Natural Landscape	16 Economic Performance	17 Employment Levels	18 Deprivation	19 Skills and Education	20 Transport	Score	Summary
SDO1: Village Clusters	A cluster of villages that interact with each other together to form a sustainable focus for development. Two identified clusters centred around Rye and Battle as key transport interchanges	--	+	-	-	+	0	0	++	++	+	0	0	-	0	+	++	+	+	+	+	9	Overall positive strategy for rural locations. Concerns over potential heritage and protected landscape impacts and the practicalities of sustainable transport options between settlements.
SDO2: Radial Settlement Network from the main urban areas of Bexhill and Hastings	A radial network of settlements connected to the larger urban areas of Bexhill and Hastings and the smaller settlements of Catsfield, Crowhurst, Netherfield, Sedlescombe, Westfield, Guestling, Icklesham, Pett and Fairlight, to provide a sustainable focus for development	--	+	-	-	+	0	0	++	++	+	0	0	-	0	0	++	+	+	+	0	7	Positive overall strategy, however it could encourage more car travel to the larger urban areas. Similar impacts to the Town/Village network cluster strategy, but more neutral impacts, making it score lower overall.
SDO3A: Bexhill Greenfield Growth Option 1 –within existing road network	Bring forward development in sustainable locations on the edge of West Bexhill that can be accessed and developed within the existing road network.	--	+	-	-	+	0	0	++	++	++	+	0	-	0	0	+	++	+	++	0	10	Strong positive strategy that seeks to locate development where sustainability impacts are the most positive, centred around the District's largest settlement.
SDO3B: Bexhill Greenfield Growth Option 2 –with new multi-modal transport corridor	Bring forward a higher level of growth through a new sustainable community that is masterplanned, accessed and served by a new multi-modal transport corridor between the A259 (Barnhorn Road) and A2691 (Haven Brook Avenue) A.	--	+	0	-	+	0	+	++	++	++	+	0	-	0	0	++	++	++	++	++	16	Strong positive strategy that seeks to focus development and a new transport corridor in a masterplanned way where sustainability impacts are most positive, centred around the District's largest settlement.
SDO4: Sustainable settlement extensions	Prioritise new development on the edge of sustainable settlements, providing major development and extending settlement boundaries where appropriate	--	+	-	-	+	0	0	++	++	++	0	0	-	0	0	++	+	+	+	0	8	Sensitive development on the edge of settlements is generally positive, although some settlements will be more sustainable than others, and others may have physical constraints.
SDO5: Hastings Fringes Urban growth	Prioritise development on the edge of Hastings in sustainable locations, which may provide opportunity for joint delivery of sites in both Hastings and Rother	--	+	-	-	+	0	0	++	++	++	0	0	-	0	0	++	++	+	+	0	9	Positive strategy to locate development on the edge of Hastings where access to services and facilities is good. Some physical constraints would impact delivery.
SDO6: Brownfield Intensification and redevelopment	Focus development within the existing areas of built form of the settlements, focusing on brownfield development and higher densities	--	++	0	-	++	0	0	+	++	++	0	0	-	0	++	++	++	+	+	+	14	Strong positive strategy, with no major environmental impacts, as development can be contained within the existing urban area, primarily on brownfield sites.
SDO7: New rural settlement(s)	Opportunity for (a) standalone settlement(s), with the provision of facilities and services to ensure sustainability	--	+	-	-	+	0	0	++	++	++	+	0	-	0	-	++	++	0	+	0	7	Would create an environmental impact, but an opportunity to provide a sustainably planned settlement which is connected to the wider network of settlements.

Spatial Development Options	Description/Vision	1 Air pollution	2 Biodiversity	3 Climate Change	4 Water Consumption	5 Flooding	6 Coastal Erosion	7 Health and Well-being	8 Housing	9 Accessibility to services	10 Safe Environments	11 Historic Environment	12 Pollution	13 Waste and Recycling	14 Water Pollution	15 Natural Landscape	16 Economic Performance	17 Employment Levels	18 Deprivation	19 Skills and Education	20 Transport	Score	Summary
SD08: Proportional growth across the District (by population)	In principle, distribution of development proportionally based on the current population of each settlement (does not take account of constraints)	--	+	-	-	+	0	0	++	++	+	0	0	-	0	0	+	+	+	+	0	6	This option would exacerbate the current situation as growth would be proportional, would not necessarily proactively address sustainability issues.
SD09: Proportional growth by settlement form and function	In principle, distribution of development proportionally based on the order of the settlement in the network of settlements (service centre or hierarchy approach which does not take account of constraints)	--	+	-	-	+	0	+	++	++	+	0	0	-	0	0	+	+	+	+	0	7	This option would exacerbate the current situation as growth would be proportional based on service centres and hierarchy approach. Some settlements would not benefit and would have no further growth.
SD10: A21 Corridor growth, with focus on sustainable transport corridors	Focus development along the A21 within an identified corridor of settlements, with opportunities for extensions. Provide opportunities for sustainable travel through enhanced bus services and cycling provision along this corridor.	--	+	-	-	+	0	0	++	++	++	0	0	-	0	0	++	++	+	++	-	9	A positive strategy to allow for development to directly access the A21 corridor for transport movement, although this could have considerable environmental impacts. Opportunity to create a sustainable multi-modal corridor.
SD11: Growth in settlements with railway stations or sustainable transport alternatives	Focus development in settlements served by railway stations or sustainable transport alternatives for accessibility	--	+	0	-	+	0	0	++	++	++	0	0	-	0	0	++	++	+	++	++	13	A strong sustainable strategy, although growth may be limited by physical constraints. Some settlements would need to improve their level of services and facilities to cater for a larger population.
SD12: Development focused outside the AONB	Concentrate new development in all locations outside the High Weald AONB, resulting in a southern focused development strategy around Bexhill and Rye	--	++	-	-	-	0	0	+	+	+	0	0	-	0	+	+	+	+	+	0	4	Development is limited to small areas of the District which are impacted by other environmental constraints such as flooding and would not support housing and employment land needs within the AONB

Figure 10: Summary of Development Strategy options, as set out in the Interim Sustainability Appraisal (2024)

Spatial Development Strategy Options	Score	1. Does this have a <u>significant</u> effect on the SA objective(s), whether positive or negative? State Y/N	2. Is the likely Impact? Negative (-1)	2. Is the likely Impact? Neutral (0)	2. Is the likely Impact? Positive (1)	3. Is this a temporary or permanent Impact? State T or P	4. Is this a short term or long term impact? State ST or LT	5. Are there synergies between other policies (or options) which might amplify the effect? State Y or N	6. Commentary/Notes Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score
SD03B: Bexhill Greenfield Growth Option 2: with New Multi-modal Transport Corridor	16	Yes – significant positive impact			☑	Permanent	Long Term	Yes , other strategies are linked e.g. SDO3A, 11, 4, 8, 9 and 12	Highly sustainable option, focused on the district's largest settlement, creation of multi-model corridor is a long term strategy beyond the timeframe of the Local Plan and is therefore not currently feasible. In principle this would have wider cumulative impacts on other strategies, e.g. opening up and providing better access for settlements within radial development

Spatial Development Strategy Options	Score	1. Does this have a significant effect on the SA objective(s), whether positive or negative? State Y/N	2. Is the likely Impact? Negative (-1)	2. Is the likely Impact? Neutral (0)	2. Is the likely Impact? Positive (1)	3. Is this a temporary or permanent Impact? State T or P	4. Is this a short term or long term impact? State ST or LT	5. Are there synergies between other policies (or options) which might amplify the effect? State Y or N	6. Commentary/Notes Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score
									of Bexhill and for journeys through the District ie. on to Eastbourne to the west.
SDO6: Brownfield Intensification and Redevelopment	14	Yes – significant positive impact			☑	Permanent	Long Term	Yes , this option can be considered District wide and alongside all other options	Sustainable option with limited environmental and AONB impacts as it is a brownfield urban led strategy. A long-term strategy as it relies on sites coming forward – and supply is currently limited. Can be bolstered by windfall development.
SDO11: Growth in settlements with train stations or sustainable transport alternatives	13	Yes – significant positive impact			☑	Permanent	Long Term	Yes , links to other strategies involving the District's major settlements	Sustainable option, with direct benefits on sustainable transport and moving away from car use. Shorter term carbon emissions impact if road vehicles are to become electric vehicles, but still negative impacts in relation to traffic congestion, equality and road safety.
SDO3A: Bexhill Greenfield Growth Option 1: within existing road network	10	Yes – positive impact			☑	Permanent	Long Term	Yes , other strategies are linked e.g. SDO3B, 11, 4, 8, 9 and 12	Long term impact, with long term vision for the wider Bexhill area. Linkages to provide greater connectivity and accessibility to Bexhill's community facilities and services. Feasible option based on the deliverability of new transport routes in the West Bexhill area. Significant junction and traffic interventions would still be required. To be tested at the next stage of the Local Plan.
SDO1: Village Clusters	9	Yes – positive impact			☑	Permanent	Long Term	Yes , linkages to A21 corridor	Sustainable longer term strategy for villages and towns in rural locations, but with close proximity to nearby settlements, where sustainable transport options can be provided.
SDO5: Hastings Fringes Urban Growth	9	Yes – positive impact			☑	Permanent	Long Term	Yes , same principles as SDO4 sustainable settlement extensions	Long term impacts, land availability around Hastings Fringes is finite based on environmental and topographic constraints. It would be unsuitable for continuous extension into the countryside but there are opportunities for sustainable growth with supporting infrastructure, services and facilities.
SDO10: A21 Corridor Growth with Focus on Sustainable Transport Corridors	9	Yes – positive impact			☑	Permanent	Long Term	Yes , linkages to strategies involving settlements along the A21	Sustainable strategy in locating development along the strategic road network if sustainable travel options such as bus routes, cycling and walking infrastructure can be provided
SDO4: Sustainable Settlement Growth	8	Yes – positive impact			☑	Permanent	Long Term	Yes , linkages to town/village network clusters, radial development and growth corridors	Long term impacts, land availability around settlements in some instances is finite based on environmental and topographic constraints. It would be unsuitable for continuous extension into the countryside.
SDO2: Radial Settlement Network from the Main Urban areas of Bexhill and Hastings ¹⁷	7	No – not a significant impact			☑	Permanent	Long Term	Yes , linkages to sustainable settlement extensions	A sustainable strategy that allows for sensitive amounts of development that are well connected to the existing larger urban areas and where travel distances to services and facilities are short. Long term changes required in providing more effective sustainable travel alternatives.

¹⁷ Spatial Development Option reference SDO2 was erroneously shaded 'red' in the Interim Sustainability Appraisal (2024) and should have been shaded 'green' as an option taken forward. This has been rectified in the table shown above.

Spatial Development Strategy Options	Score	1. Does this have a <u>significant</u> effect on the SA objective(s), whether positive or negative? State Y/N	2. Is the likely Impact? Negative (-1)	2. Is the likely Impact? Neutral (0)	2. Is the likely Impact? Positive (1)	3. Is this a temporary or permanent Impact? State T or P	4. Is this a short term or long term impact? State ST or LT	5. Are there synergies between other <u>policies</u> (or options) which might amplify the effect? State Y or N	6. Commentary/Notes Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score
SD07: New Rural Settlements	7	No – not a significant impact			☒	Permanent	Long Term	No , this is a discreet policy direction	Long term impacts in permanently changing the character of the rural area. Difficult to deliver without major landowner support and land availability.
SD09: Proportional Growth by Settlement Form and Function	7	No – not a significant impact			☒	Permanent	Long Term	Yes , linkages to urban intensification and settlement extensions	As this replicates expansion of the current settlement pattern, this assumes settlements can continue to grow, which may not be possible due to physical constraints.
SD08: Proportional Growth Across the District	6	No – not a significant impact			☒	Permanent	Long Term	Yes , linkages to urban intensification and settlement extensions	As this replicates expansion of the current settlement pattern, this assumes settlements can continue to grow, which may not be possible due to physical constraints.
SD012: Development focused outside the AONB	4	No – not a significant impact		☒		Permanent	Long Term	Yes , linkages in Bexhill development options	Short and long term impacts would include a southern, coastal focused development strategy which could result in greater disparities between rural and urban areas and a potential north-south divide in the provision of services and facilities.

SA of the additional and revised Development Strategy options for the Draft Local Plan – Development Strategy and Site Allocations (2026)

Development needs and NPPF update

4.24. Following the first Regulation 18 consultation on the draft Local Plan in summer 2024, the NPPF was updated in December 2024. This included changes to the standard method for calculating Local Housing Need. The updated method yielded a LHN figure for Rother district of 912 net new homes per year (up from the 733 net new homes per year). Over the revised 17-year plan period of 2025-2042 for the Rother Local Plan, this amounted to a need of 15,504 net new homes. This revised LHN figure set the overall context for considering the Development Strategy. Whilst there were differences in the LHN figure for Rother owing to the updated standard method, overall, the figures provided for a significant increase in housing in Rother compared to the adopted Core Strategy (2014) housing target of 335 homes per year. From the early stages, therefore, this was a key consideration for plan preparation.

4.25. Needs for employment land and floorspace, and retail and leisure needs, continued to be informed by the HENDA (2024) and Rother Retail and Town Centre Uses Study (2023) respectively, however recognising these documents would be subject to review and updating prior to the Regulation 19 stage of the plan process.

Additional options considered

4.26. There were a wide range of representations made on the draft Rother Local Plan (2024) during the first Regulation 18 consultation. The Council has prepared a Consultation Statement summarising the comments received, which should be referred to for further information.

4.27. In terms of the proposals for the Development Strategy, and other related matters covered

by the plan, many representations expressed concerns about the level of growth being planned for in Rother and the harmful impact this may have on the countryside, including the National Landscape, and on the environment. The Council has acknowledged the challenge posed by the national policy requirements to significantly boost housing supply (particularly to meet the identified Local Housing Need as set out by the NPPF and the standard method for calculating this figure), but stresses that it must plan positively to do so. It has therefore considered a high number of options for the Development Strategy and assessed these for their overall sustainability, as set out in the Interim and Final Sustainability Appraisal Reports.

4.28. Through the public consultation, several additional options for the Development Strategy were identified, which had not previously been subject to the SA. These options are discussed further below.

A21 Corridor option

4.29. At the first Regulation 18 consultation, an 'A21 growth corridor' option was considered and taken forward as part of the preferred Development Strategy. This option provided for development along the A21 trunk road within an identified corridor of settlements, together with a sustainable transport corridor (including improved sustainable travel options such as bus routes, cycling and walking infrastructure). Representations to the consultation, including from statutory bodies, raised concerns with the deliverability of this option due to a lack of identified funding and justification for potential works to the Strategic Road Network, and need for further cross-boundary discussions with relevant authorities.

4.30. The HELAA (2026) findings indicated that there are potential development sites in some of the larger settlements along the A21 corridor that can assist in meeting Rother's identified development needs. As such, the Council considered that there was still merit in exploring an option for new development in this area. Rather than wholesale growth along

the corridor, the revised option was for focussed development only within and on the edges of those larger settlements which already have a level of services and facilities and offer existing opportunities for sustainable travel (including improvements to bus services, cycling and walking infrastructure). A revised A21 growth corridor option was therefore prepared, as set out below as Option SDO13.

Strategic Gap option

4.31. It was suggested through the first Regulation 18 public consultation that opportunities should be explored to develop within the district's strategic gaps. This option had not

previously been considered for the Development Strategy (albeit there was consideration for new development in the countryside and at the edges of existing settlements through the thematic policy topic areas). Therefore, the Council prepared an additional option, as set out below as SDO 14.

SA of the options

4.32. The refined and additional Development Strategy Options - A21 Corridor option (reference SDO13) and Strategic Gap option (reference SDO14) respectively - were assessed using the SA Framework, and findings are set out in **Figure 11** and **Figure 12**.

New spatial development option	Description/ vision	Focus areas for growth in settlements/ areas of built form
SDO13 – A21 corridor growth, focussed within and around existing larger settlements.	Development along the A21 road corridor, focussed within and around existing settlements, where there is a reasonable level of local services.	The following settlement areas: Robertsbridge/Salehurst, Hurst Green, and Flimwell.
SDO14 – Development within the strategic gaps	Significant new development within identified strategic gaps, with new or improved linkages to the nearest settlements.	The strategic gaps identified through the adopted Development and Site Allocations Local Plan (2019): • Bexhill and Hastings/St Leonards – gap along the A259 corridor. • Crowhurst and Hastings/St Leonards – gap between the settlements, including between edge of Crowhurst to Hastings-London railway. • Battle and Hastings – gap between settlements, including edge of Telham and Breadsell Farm. • Fairlight and Hastings – boundary of Hastings borough and edge of Fairlight Cove. • Rye and Rye Harbour - between Rye citadel and Harbour Road industrial area/Rye Harbour village.

Figure 11: Assessment of revised and additional Development Strategy Options

Spatial Development Options	Description/Vision	1 Air pollution	2 Biodiversity	3 Climate Change	4 Water Consumption	5 Flooding	6 Coastal Erosion	7 Health and Well-being	8 Housing	9 Accessibility to services	10 Safe Environments	11 Historic Environment	12 Pollution	13 Waste and Recycling	14 Water Pollution	15 Natural Landscape	16 Economic Performance	17 Employment Levels	18 Deprivation	19 Skills and Education	20 Transport	Score	Summary
SDO13: A21 corridor growth, focussed within and around existing settlements.	Development along the A21 road corridor, focussed within and around existing settlements, where there is a reasonable level of local services.	--	+	-	-	+	0	0	++	++	++	0	0	-	0	0	++	++	+	++	0	10	A positive strategy to focus growth within and around existing settlements with access to local services. Impacts to landscapes can be minimised due to development within and around existing built-up area.
SDO14: Development within the strategic gaps	Significant new development within identified strategic gaps, with new or improved linkages to the nearest settlements.	--	-	-	-	0	0	0	++	0	++	0	0	-	0	--	++	++	+	++	0	3	Whilst helping to meet identified development needs, the strategy would likely have an adverse impact on natural landscapes and the environment, as well as undermine the settlement hierarchy. New or enhanced linkages to existing settlements would be created to maximise sustainability.

Figure 12: Summary of revised and additional Development Strategy Options

Spatial Development Strategy Options	Score	1. Does this have a significant effect on the SA objective(s), whether positive or negative? State Y/N	2. Is the likely Impact? Negative (-1)	2. Is the likely Impact? Neutral (0)	2. Is the likely Impact? Positive (1)	3. Is this a temporary or permanent Impact? State T or P	4. Is this a short term or long term impact? State ST or LT	5. Are there synergies between other policies (or options) which might amplify the effect? State Y or N	6. Commentary/Notes Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score
SDO13: A21 corridor growth, focussed within and around existing larger settlements.	10	Yes – positive impact overall			☑	Permanent	Long Term	Yes , linkages to strategies involving settlements along the A21	Sustainable strategy in locating development along the strategic road network within and around existing settlements with service provision; sustainability could be improved by enhanced travel options such as bus routes, cycling and walking infrastructure over the medium to long term.
SDO14: Development within the strategic gaps	5	Yes – mainly negative impacts	☑			Permanent	Long Term	Yes , linkages to town/village network clusters, radial development and growth corridors in proximity to existing strategic gaps	The strategy is likely to undermine the settlement hierarchy by the cumulative and long-term impact of new development in the strategic gaps, resulting in coalescence of settlements and undermining landscape and local character. Long term changes required in providing more effective sustainable travel alternatives, to ensure sustainable linkages with development and nearby settlements.

Discussion on the revised and additional options

- 4.33. The revised A21 Development Strategy Option (SDO13) broadly scores positively across the SA objectives. It focusses development within and around existing settlements, where there is relatively good access to local services and facilities (compared to more isolated areas well beyond existing settlement boundaries). Compared to the initial A21 option (SDO10), there is less scope for significant transport investments to support a 'sustainable transport corridor'. However, in light of current deliverability issues for such infrastructure, the revised option provides an approach to bring forward larger sites in sustainable locations, helping to address local housing and employment needs, and provide for opportunities for enhanced public realm, including cycle and walking routes to enhance connectivity within and between villages.
- 4.34. The additional Development Strategy Option for focussing growth in identified strategic gaps (SDO14) has relatively low scores on the SA objectives, particularly in comparison to other options. Whilst this option would enable the delivery of new development to meet identified needs, particularly for housing, there are significant drawbacks to this from an SA perspective. In particular, the option would undermine the principal intent of the strategic gaps, which is to: maintain the separate identity and distinctiveness between settlements; to maintain the strategic settlement pattern; and to prevent the coalescence of settlements. Further, the option would invariably result in significant new development on greenfield land. Therefore, the option generally scores negatively on objectives related to landscape and environment.
- 4.35. As such, in preparing the draft Local Plan (2026), the Council considered it appropriate to progress with Option SDO13 as part of the Development Strategy, but not SDO14. This reasons for this are discussed in further detail later in this report.
- 4.36. Notwithstanding this assessment, the Council acknowledged that sites within the strategic gaps, and also more localised green gaps adopted through Neighbourhood Plans, have been assessed through the HELAA process; and consequently, it is important to note that the rejection of this option as part of the overall Development Strategy will not necessarily preclude future site allocations within one or more of the strategic gaps or Neighbourhood Plan green gaps (and a subsequent re-drawing of the strategic/ green gap boundary), if a site is assessed as suitable, available and achievable for development. Furthermore, the Council expected that draft Rother Local Plan (2024) Policy DEV6 would be used to assess proposals through the development management process on a case-by-case basis.

SA of the Development Strategy options for Gypsy, Traveller and Travelling Showpeople

Background and policy context

- 4.37. The national Planning Policy for Traveller Sites (PPTS, updated 2024) sets out the Government's planning policy. Paragraphs 4 and 9 of the PPTS confirm that Local Planning Authorities should make their own assessments of accommodation needs and, through Local Plans, set pitch targets for gypsies and travellers, and plot targets for travelling showpeople, which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring LPAs. Paragraph 10 requires LPAs to identify, and update annually, a supply of specific, deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets; and a supply of specific, developable sites or broad locations for years 6-10, and where possible, for years 11-15.
- 4.38. Rother District Council has worked with the other East Sussex local planning authorities to commission a joint Gypsy, Traveller and

Travelling Showpeople Accommodation Needs Assessment (GTAA) (2022). This study provides an assessment of permanent and transit accommodation needs for gypsies, travellers and travelling showpeople across the county, and also across each district and borough, over the period 2021 to 2040. An update to the East Sussex GTAA is due to be completed in 2026, to give an up-to-date picture of need to the end of the plan period.

4.39. The headline findings of the GTAA (2022) are as follows:

- Permanent pitches - identified need for Rother district of 28 permanent pitches 2020-2040. The Council notes that when the 10 pitches that have now been delivered within this period are deducted, the outstanding need in Rother is 18 pitches.
- Transit sites (temporary accommodation for gypsy and traveller households travelling through the area) - while there may be a need for additional transit provision in the county, there is currently insufficient evidence to determine the number of additional transit pitches required.
- Travelling showpeople - there are no travelling showpeople yards in the district, and just 1 yard in the county, in Wealden district. While there is expected to be a demand for a small number of additional plots for travelling showpeople to 2040, this is expected to arise from natural population growth and should be met close to the existing yard in Wealden. There is no specific evidence of travelling showpeople accommodation need within Rother.
- Boat dwelling community - that there is a lack of navigable waterways within East Sussex and few suitable locations for moorings, and a lack of evidence to quantify any accommodation need.

Formulating the Development Strategy options

4.40. The first draft Rother Local Plan (2024) set out the strategic approach to accommodation needs of gypsies, travellers and travelling showpeople, which was set out in the Development Strategy section of the plan. This consisted of two strategic options, or reasonable alternatives, which are considered in tandem, as set out in

Figure 13: Development Strategy Options for Gypsy, Traveller and Travelling Showpeople

Option for gypsy, traveller and traveller showpeople (Development Strategy)	Description	Geographic focus area(s)
SDO-GTTS1 - Establish site selection criteria and allocate sites having regard to these criteria and identified need.	Carry out a site identification and selection process, having regard to the Local Plan objectives, the future needs of occupiers and the likely availability of sites for the intended occupiers. Sites should meet the criteria set in Policy HOU11 of the draft Local Plan (2024).	District-wide, in accordance with the location criteria in draft Local Plan Policy HOU11. This includes: Where possible, within or close to an existing settlement and accessible to local services by foot, by cycle or by public transport (except transit sites).
SDO-GTTS2 – Criteria based policy for windfall development.	Development proposals for windfall (non-allocated) sites should meet the criteria set in Policy HOU11 of the draft Local Plan (2024).	

4.41. below.

Memorandum of Understanding has been prepared and, at the time of writing, is due to

Option for gypsy, traveller and traveller showpeople (Development Strategy)	Description	Geographic focus area(s)
SDO-GTTS1 - Establish site selection criteria and allocate sites having regard to these criteria and identified need.	Carry out a site identification and selection process, having regard to the Local Plan objectives, the future needs of occupiers and the likely availability of sites for the intended occupiers. Sites should meet the criteria set in Policy HOU11 of the draft Local Plan (2024).	District-wide, in accordance with the location criteria in draft Local Plan Policy HOU11. This includes: Where possible, within or close to an existing settlement and accessible to local services by foot, by cycle or by public transport (except transit sites).
SDO-GTTS2 – Criteria based policy for windfall development.	Development proposals for windfall (non-allocated) sites should meet the criteria set in Policy HOU11 of the draft Local Plan (2024).	

4.42. A ‘no policy’ option or approach (i.e., to not make dedicated provision for this group or accommodation type) is not considered by the Council to be a reasonable option. This is because the Council is required by national planning policy to plan-positively to meet identified needs of the gypsy, traveller and travelling showpeople community.

be formalised. Joint work has included a county-wide call for sites, and agreement on site assessment criteria. This is largely in line with draft Rother Local Plan Policy HOU11, and therefore broadly consistent with the options set out above.

SA of the options

4.43. It is noted that since the first Regulation 18 consultation on the draft Rother Local Plan (2024), an East Sussex wide group has been established to ensure collaborative work on coordinating and planning for the cross-boundary strategic planning issues in relation to provision of gypsy, traveller and travelling showpeople accommodation. A

4.44. The SA of the options, or reasonable alternatives, for the Development Strategy for gypsy, traveller and travelling showpeople accommodation was set out in the Interim Sustainability Appraisal (2024). The findings of the SA are duplicated in this report for information and are set out in **Figure 14** below.

Figure 13: Development Strategy Options for Gypsy, Traveller and Travelling Showpeople

Figure 14: SA of the Development Strategy preferred approach for gypsy, traveller and travelling showpeople accommodation, as set out in the Interim Sustainability Appraisal (2024)

SA Objective / Proposed Strategy	Proposed Strategy	Commentary
1. Reduce air pollution from transport and development and improve air quality.	-	Population rise and associated growth will inevitably cause a negative impact against this objective, Additional population and vehicle use along with the construction of development will have a negative impact. The amount of growth associated with this type of provision is however quite minimal compared to overall development.
2. Biodiversity is protected, conserved and enhanced.	o	There will be opportunity for BNG in some areas, but some biodiversity may be slightly impacted by development. This will be managed on a site-by-site basis so overall impact should be neutral.
3. The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation)	-	The development strategy alone will not be able to deliver this. Whilst the visions are aspirational and support climate change measures, inevitably growth will result in increased pressure, managed by other supporting policies in the Green to Core chapter of the Local Plan.
4. Minimise water consumption.	-	Water consumption cannot be reduced significantly through new growth and development; there will be additional pressure placed on water usage. Supportive policies to help reduce overall water consumption are found in other policies in the Local Plan.
5. Manage and reduce the risk of flooding (fluvial, tidal and surface water), now and in the future, and increase resilience to the wider effects of climate change.	o	The impact of flooding will be managed on a site-by-site basis. This will be assessed on a case-by-case basis when determining site allocations. Sites severely constrained by flood risk have not currently been identified for development
6. The risk of coastal erosion is managed and reduced, now and in the future.	++	Sites will not be selected in areas where there is risk to coastal erosion.
7. The health and well- being of the population is improved and inequalities in health are reduced.	++	Meeting this specific housing need and supporting growth and development will ensure that people can live well locally across the whole District, with better connections and access to healthcare within sub-areas.
8. More opportunities are provided for everyone to in a suitable home to meet their needs.	++	This strategy provides the opportunity for new housing to meet the specific local need identified.
9. All sectors of the community have improved accessibility to services, facilities, jobs, and social and cultural opportunities.	+	Although not directly linked, there is opportunity for growth in local economy and can act as a catalyst for improved services and facilities to cater for residential growth.
10. Safe and secure environments are created and there is a reduction in crime and fear of crime.	+	In principle, through community cohesion and mixed residential and commercial development with supporting infrastructure, crime and the fear of crime can be reduced.
11. Historic environment/ townscape is protected, enhanced and made more accessible.	+	Development will be sensitive to the historic environment. Therefore an overall positive impact, but some small impacts may arise on a site-by-site basis.
12. The risk of pollution to land and soils is reduced and quality is improved.	o	This is a neutral impact. Pollution can be controlled, but there may be some risk associated with development.
13. Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced.	-	The amount of wate cannot demonstrably be reduced through the development strategy, it would require supportive policies, some of which are out of the control of planning policy.
14. The risk of pollution to water is reduced and water quality is improved.	o	This is a neutral impact. Pollution can be controlled, but there may be some risk associated with development.
15. Ensure that Parks, gardens and countryside are protected, enhanced and made more accessible.	+	Open space of high importance can be protected, with greatest opportunity for protection in areas outside High Weald national landscape. Sensitive development will only occur in areas of the High Weald which is covers over 82% of the district
16. Economic performance is improved.	+	There are linked opportunities for localised economic growth to support urban and rural communities.
17. There are high and stable levels of employment and diverse employment opportunities for all.	+	There are linked opportunities for localised economic growth and more diverse employment opportunities to support urban and rural communities.
18. Levels of poverty and social exclusion are reduced, and the deprivation gap is closed in the more deprived areas.	++	Development to meet local need along with supportive infrastructure should support all of the community with sustainable communities enabling the poverty and deprivation gap to be narrowed.
19. Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve.	+	There are opportunities for localised economic growth with more skilled employment opportunities
20. Road congestion levels are reduced and there is less car dependency and greater travel choice.	-	Whilst there will be sustainable transport alternatives, overall road congestion relevels will inevitably not reduce. Transport interventions will be required to cater for overall growth.
SCORING	10	

Policy Options	Does this have a significant effect on the SA objective(s), whether positive or negative? (See also the baseline indicators and prompt question)	What is the likely Impact?	Is this a temporary or permanent Impact?	Is this a short term or long term impact?	Are there synergies between other policies (or options) which might amplify the effect?	Commentary/Notes (Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score)
Development Strategy for Gypsies, Travellers and Travelling Showpeople	Yes, strong positive impacts	++	Permanent	Long Term	Yes, general housing policies on meeting local need and Policy HOU11 Criteria based policy	The delivery of new pitches to meet need by the end of the plan period and to the timescales identified in the development strategy will be important to ensure that other policies in the plan area effective in ensuring sustainable communities and ensuring that people can live well locally. The positive impacts identified in the SA will be long term impacts that ensure the needs of this group of society can be met and can be integrated into society.

Reasonable alternatives: additional considerations for the Regulation 19 Rother Local Plan

- 4.45. As with the first Regulation 18 consultation in 2024, there were a wide range of representations made on the draft Rother Local Plan – Development Strategy and Site Allocations (2026). Overall, with respect to the Development Strategy, feedback from both consultations reflected concerns about the level of growth being planned for in Rother and the harmful impact this may have on the countryside, including the National Landscape, and on the environment. The Council has prepared Consultation Statements that provide further details on the representations received and how they have been considered and should be referred to for further information.
- 4.46. The focus of this SA Report is whether consultation feedback, new evidence, or changes to the policy context had any implications for the preparation of the Development Strategy and particularly the consideration of reasonable alternatives.

Development needs for Rother

- 4.47. Development needs for Rother were kept under review throughout the production of the Local Plan, and evidence of identified needs for housing, employment, and retail and leisure uses was reviewed following the second Regulation 18 consultation in 2026.
- 4.48. As noted previously, changes to the standard method for calculating the Local Housing Need resulted in a revised LHN figure for Rother during the early stages of the plan process. Then, in May 2026, the LHN for Rother was updated again and calculated at 895 net new homes per year - down from the 912 at the time of the second Regulation 18 consultation in 2026.¹⁸ This was a nominal downward adjustment on the LHN amounting to 17 less homes per year, or 289 less homes

over the 17-year plan period, and therefore not considered to be significant in the overall context of the Development Strategy.

- 4.49. Furthermore, informed by 2026 Regulation 18 consultation feedback and new evidence (including an update to the Housing and Economic Land Availability Assessment), the Council updated its position on land that was suitable, available and achievable for development. At the Regulation 19 stage, the proposed housing requirement for the Local Plan increased from the 2026 Regulation 18 document, from a minimum of 7,881 dwellings (excluding windfall allowance) over the 17-year plan period to 8,755 dwellings (including windfall allowance).
- 4.50. The Housing and Economic Development Needs Assessment (HEDNA) Update (2026) provided updated information on future needs for employment uses, broadly categorised by office, industrial and warehousing uses. For Rother, the study forecasts an additional 5,155 jobs across all main employment sectors over the plan period. This job growth is then translated into a future employment land requirement of 26.2 hectares. This compares with the 24.7 hectares of employment land set out in the 2026 Regulation 18 document.
- 4.51. The Rother Retail and Town Centre Uses Study – Update (2026) provided an update on the 2023 study. In terms of quantitative needs, the updated study concluded that there continued to be no need for additional retail floorspace in the district, as well as no need for additional commercial leisure floorspace. Rather, it suggested that opportunities should be taken to consolidate and improve existing provision.
- 4.52. Accommodation needs for the gypsy, traveller and travelling showpeople community has been assessed through the East Sussex joint GTAA, as discussed previously in this report. The GTAA 2022, is at the time of writing this report, the latest evidence of need as the

¹⁸ This was owing to the Government's publication on 21st May 2026 of updated dwelling stock information in the

district, which is factored into the Local Housing Need calculation.

GTAA update is pending and expected later in 2026. Accordingly, needs for this group have been considered in line with the latest available evidence.

- 4.53. In conclusion, updated evidence on development needs and requirements, in so far as overall quantum of development is concerned, did not necessitate a substantive rethinking of preferred approaches, or new alternative approaches, from the 2026 Regulation 18 to the Regulation 19 stage.
- 4.54. Whilst recognising there was an increase in housing requirement proposed between the 2026 Regulation 18 and Regulation 19 stages, this must be seen in the wider context of the 17-year plan period, where this is a limited amount of residual growth on a yearly average. For economic uses, there was an increase in the employment requirement of some 1.5 hectares. However, the key implications were terms of the sectoral breakdown of need by main employment sector, and this is discussed later in this SA Report through the appraisal of the Local Plan policies in 'A Thriving Local Economy' chapter.

Call for Sites and changes to the proposed site allocations

- 4.55. The Council continued to keep its 'Call for Sites' open in order to ensure the public and other stakeholders had an opportunity to put forward sites for development, or other uses, for consideration during the production of the Local Plan, up to the Regulation 19 stage. The Council has also continued to update the Housing and Economic Land Availability Assessment, taking account of the latest available information on site availability, suitability and deliverability.
- 4.56. Furthermore, site allocation proposals in the draft Rother Local Plan (2026) have been subject to review and updating by the Council in response to consultation feedback and other considerations, such as new evidence.
- 4.57. The portfolio of site allocations and associated policy requirements has therefore

been refined from the Regulation 18 to the Regulation 19 stage. This includes the removal and addition of sites, as well as changes to site requirements in some cases, such as revised site boundaries and indicative development capacities.

- 4.58. Updates to the HELAA and changes to the overall site portfolio are not considered by the Council to significantly affect considerations given to the Development Strategy to-date, or going forward, for the production of the Regulation 19 plan. In general, the site portfolio represents a refinement and evolution from the second draft Rother Local Plan (2026), rather than a comprehensive or substantive re-working of the site portfolio, including the broad spatial distribution of suitable and deliverable sites. As set out earlier, the HELAA did result in slight changes to the overall housing requirement proposed in the Local Plan, based on site suitability, availability and achievability.

Strategic Gaps

- 4.59. Some respondents to the 2026 Regulation 18 consultation (including local authorities and planning agents) made representations on the Strategic Gaps option for the Development Strategy (i.e., SDO14). This option which was considered but discounted during the preparation of the draft Local Plan (2026). In particular, respondents suggested that the approach should be revisited given the expected shortfall on the LHN set out in the Plan.
- 4.60. The Council considers that this option has been suitably explored through the plan process, including assessment through the SA process, as set out earlier in this report. It also considers that the reasons for discounting this option remain valid, particularly in terms of ensuring the principal intent of the gaps is not undermined. The Council also notes that through the HELAA, it has considered sites located outside of the settlement boundaries.

- 4.61. There were a number of representations to the 2026 Regulation 18 on the High Weald National Landscape (including from the High Weald AONB Unit), expressing concerns that new development might adversely impact on it.
- 4.62. Overall, the Development Strategy set out in the Draft Rother Local Plan (2026) sought to direct development away from the National Landscape; however still making provisions for new development to come forward within it, including by site allocations, to support sustainable development in rural areas and help to address unmet housing needs. This approach was set in response to legislative and national policy requirements, which provided that the Council must “seek to further” the statutory purposes of Protected Landscapes¹⁹, which include National Landscapes. As well, in the context of provisions in the NPPF which provide tests for the circumstances in which development in the National Landscape may be acceptable in principle.
- 4.63. In response to the consultation feedback, the Council commissioned a study, Landscape Sensitivity to Residential and Commercial Development within Rother District (2026), to assess the impact of the Local Plan proposals. This study informed the refinement of the Plan, particularly with development requirements on individual site allocations, ensuring a positive response to landscape sensitivity and constraints. However, at the wider strategic level, there were no significant implications for the Development Strategy, as the starting point for it was set having regard to the need to steer significant new development away from it.

Strategic transport and mitigations

- 4.64. The Department for Transport (DfT) Circular 01/2022 (Strategic Road Network and the

Planning System) sets out the Government’s approach to planning for the highway network. It broadly aims to support a shift to sustainable transport modes and away from private vehicle use. The Circular introduced the ‘vision-led’ approach to planning for transport, and associated consideration of mitigation measures. The NPPF gives effect to Circular 01/2022 and requires the prioritisation of sustainable transport modes both through the plan-making and planning approvals process.

- 4.65. In complying with the Circular and NPPF, the Council has undertaken transport modelling through the Shared Transport Evidence Base (STEB) to inform the preparation of the Local Plan. This included early-stage work through the wider East Sussex county transport assessment in 2022, and a further detailed assessment of new growth options in 2026²⁰. The latest study concludes that, when the proposed Development Strategy is assessed for impacts, that for most locations the likely increases in delays on the SRN are relatively minor; however, a small number of key areas are forecast to experience more significant impacts, for which mitigation measures are proposed.
- 4.66. Given the direction from national policy, it is not considered that there are any further ‘reasonable alternatives’ for the Development Strategy in respect planning of around the strategic road network. However, to embed the principles of Circular 01/2022, and help give effect to it in future planning decisions, the Council has included a new policy in the Local Plan (Policy INF2).
- 4.67. In response to consultation feedback, and also through exploratory work on the spatial strategy, the Council has given consideration to a potential bypass of west Bexhill. However, from the early stages of the plan process, both East Sussex County Council (Highways) and National Highways have been clear that the bypass of west Bexhill is not

¹⁹ The Protected Landscapes Duty was introduced through Section 245 of the Levelling Up and Regeneration Act 2023.

²⁰ Rother District STEB 2019: Assessment of New Growth Options (2026).

deliverable at this point in time. National Highways has noted that it is not included within the Department of Transport’s Road Investment Strategy 3 that covers 2026 to 2031 and sets the Government’s multi-year investment plan for operating, maintaining, renewing and enhancing the Strategic Road Network. Accordingly, the bypass is not considered to be a reasonable alternative for this Local Plan.

Flood risk and water management

- 4.68. Some respondents to the 2026 Regulation 18 consultation raised matters concerning flood risk and other water management issues. The latest available information from the Environment Agency Flood Maps have been used to inform the HELAA and Regulation 19 Local Plan. Areas at risk of flooding from different sources are a constraint, particularly at the strategic spatial level, as they may in instances preclude new development from coming forward in specific sites or areas. The Council has kept its Level 1 Strategic Flood Risk Assessment under review, and updated it where appropriate, and also prepared a Level 2 SFRA to inform site allocation policies in the Regulation 19 Local Plan.
- 4.69. In terms of water supply and treatment, information from key stakeholders and delivery partners has been used to inform in the revised Infrastructure Delivery Plan. Further, ‘development management’ policies dealing with the natural environment are not covered by the spatial strategy but are set out in the thematic policy topic areas of the Regulation 19 Local Plan. The relevant section of this SA Report should be referred to for further information.
- 4.70. A new policy INF1 (Strategic infrastructure requirements) has been included in the Regulation 19 to ensure that growth in accordance with the Development Strategy is appropriately supported by new and improved infrastructure, including for water infrastructure.

SA of the Development (Spatial)
Strategy Rother Local Plan, Pre-Submission Version

- 4.71. **Figure 15** sets out the SA of the Development (Spatial) Strategy preferred approach for the Regulation 19 Pre-Submission Version of the Local Plan, which includes the overall Development Strategy and the strategy for Gypsies, Travellers and Travelling Showpeople. The policy is set out in the Local Plan as follows:

SS1	Spatial Strategy for Rother
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- 4.72. It is important to reiterate that the assessment below is based on a ‘policy off’ approach, as a baseline for considering the likely effects of the strategy. There are ‘policy on’ approaches that can be included in the Local Plan to help avoid or mitigate negative impacts of the Development Strategy, or to improve positive effects. For example, mitigation measures can be addressed by additional Local Plan policies, such as ‘development management’ or ‘site allocation’ policies. These are covered in the Cumulative Effects section in Chapter 7 of this report.

SA of the strategic Infrastructure and supporting strategic spatial policies

4.73. The Regulation 19 Local Plan, at Chapter 2, introduces a suite of policies in addition to the Development Strategy (Policy SS1). These policies, which help give effect to the Development Strategy and will support its delivery, are as follows:

INF1	Strategic infrastructure requirements
INF2	Transport connectivity, decarbonisation & mitigation
SS2	Development boundaries
SS3	Strategic Green Gaps
SS4	Strategy for the Countryside
SS5	Strategy for Accommodating Need of Gypsies, Travellers & Travelling Showpeople
SS6	Neighbourhood Plans & Parish Priority Statements

4.74. For completeness, the SA Report includes an individual appraisal of these policies respectively. However, it is worth noting that Policies SS2, SS3, SS4 and SS5 reflect key parts of and underpin the Development Strategy. They have been assessed together through the SA of the Policy SS1.

4.75. The strategic infrastructure policies (SS1 and SS2) set out the approach for securing new and improved infrastructure to support planned development. The Council considers the policies to be consistent with national planning policy and legislation regarding infrastructure funding regimes, and therefore there are not considered to be reasonable alternatives for these policies.

4.76. Policy SS6 complies with national planning policy by ensuring the Local Plan provides a strategic direction for the preparation and implementation of Neighbourhood Plans and Parish Priority Statements. As such, there are not considered to be reasonable alternatives for this policy.

Figure 15: SA of the Development (Spatial) Strategy in the Rother Local Plan (Policy SS1) – Regulation 19 version

SA Objective	Score	Commentary
1. Reduce air pollution from transport and development and improve air quality.	--	The strategy seeks to facilitate a significant increase in development across the district. This will result in an associated increase in population and a greater volume of vehicles, which is likely to increase air pollution from transport. Whilst locating new development within and around existing settlements may enable and support modal shift; a level of car use/reliance is expected given the largely rural nature of the district and existing public transport infrastructure provision and services. There are currently no Air Quality Management Areas in the district, which reflects a relatively positive situation in this respect.
2. Biodiversity is protected, conserved and enhanced.	O	The strategy seeks to protect internationally and nationally designated habitats sites and to locate development away from them. The strategy provides for some new development in the National Landscape, which includes biodiversity, however this is on a limited scale. At a local site level, the introduction of development on and around greenfield land may have adverse effects on biodiversity unless appropriately mitigated. The specific nature and extent of impacts is to somewhat uncertain and will be determined on a case-by-case basis through the development management process. It is noted that there is a mandatory requirement for biodiversity net gain in England for some types of new development. These findings are separate from the Habitats Regulations Assessment.
3. The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation)	-	The strategy seeks to facilitate a significant increase in development across the district. This will likely result in an associated increase in emissions arising from the construction and operation of new development as well as a greater volume of vehicles, both from residential and commercial uses. Focussing new development within and around Bexhill can provide opportunities for decentralised energy networks. Measures can be taken to improve the energy efficiency of buildings and to reduce emissions in their operation, however this is not dealt with through the development strategy.
4. Minimise water consumption.	-	The strategy seeks to facilitate a significant increase in development across the district. This will result in an associated increase in population, which is likely to lead to additional water consumption, both from residential and commercial uses.
5. Manage and reduce the risk of flooding (fluvial, tidal and surface water), now and in the future, and increase resilience to the wider effects of climate change.	-	Parts of Rother are at risk of tidal flooding given its coastal location. The majority of the district is located in Flood Zone 1 and therefore not at risk of fluvial flooding, however there are areas located in Flood Zones 2 and 3 at greater risk (particularly to the east in and around Rye). There is surface water flood risk across the district, but this is localised and concentrated along topographical flow paths of existing watercourses, dry valleys or roads. No formal critical drainage areas have been identified within the district however, the Fairlight/Pett area is of concern with regard to surface water drainage. The majority of the district is at a negligible risk of groundwater flooding. Overall, the development strategy will result in the introduction of new development in locations at different levels of risk of flooding from various sources. However, it is acknowledged that flood risk will largely be dealt with through site specific considerations, both through the plan preparation (particularly site allocations) and the development management process.
6. The risk of coastal erosion is managed and reduced, now and in the future.	O	The district is bounded by the English Channel to the south, with the coastline at risk of tidal flooding. Tidal flooding has been recorded in Rye Harbour and Camber due to the overtopping of defences, and coastal flood risk will potentially increase where coastal erosion threatens the stability of tidal flood defences. The development strategy broadly locates development away from the coastline, and flood defences are dealt with in the local plan by infrastructure requirements rather than the development strategy.

7. The health and well-being of the population is improved and inequalities in health are reduced.	O	It is uncertain how the development strategy will by itself, in isolation of other Local Plan policies, impact on the overall health and wellbeing of the population and addressing inequalities. The strategy seeks to locate new development in areas where there is relatively good access to services and facilities, along with open space. This should provide opportunities for active travel, which can have benefits for public health. However, additional demands will arise from a growing population, and an appropriate level of infrastructure will be required. The strategy will help to facilitate new housing and commercial development, which can help to address the determinants of health and wellbeing and inequality.
8. More opportunities are provided for everyone to in a suitable home to meet their needs.	++	The development strategy seeks to facilitate a significant increase in development across the district, particularly for housing. This is likely to provide more opportunities for people to access housing. Whilst the amount of development is not expected to meet the Government's Local Housing Need target in full, the strategy will nonetheless provide for a significant uplift in housing, well above and beyond the levels currently provided for in the extant Local Plan.
9. All sectors of the community have improved accessibility to services, facilities, jobs, and social and cultural opportunities.	++	The development strategy seeks to locate significant new development, particularly residential uses, in sustainable locations informed by the Settlement Study. Locating new development within and in proximity to existing towns and other settlements where there are existing services, facilities and employment opportunities along with comparably better public transport options, is likely to result in positive effects on this objective.
10. Safe and secure environments are created and there is a reduction in crime and fear of crime.	+	The strategy seeks to locate significant new development in sustainable locations informed by the Settlement Study. This will help to ensure developments are not isolated and can take advantage of or integrate well with the existing public realm. This may also support the provision of essential services, such as police and emergency services, in terms of the geographic scope of coverage.
11. Historic environment/ townscape is protected, enhanced and made more accessible.	O	Overall effects are uncertain, as impacts on the significance of heritage assets will largely be determined on a site-by-site basis. The development strategy seeks to include new development in existing settlements, where there are heritage assets including conservation areas and listed buildings.
12. The risk of pollution to land and soils is reduced and quality is improved.	O	The strategy seeks to prioritise the re-use of brownfield land where possible and this can assist with land remediation and improving ground conditions. However, the strategy will also inevitably require that some development on greenfield land is enabled, which can create a risk to ground conditions unless appropriately mitigated.
13. Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced.	-	The strategy seeks to facilitate a significant increase in development across the district. This will result in an associated increase in population and activities, which is likely to lead to greater amounts of waste being generated compared to the current situation. Measures can be taken to promote and enable minimising and recycling/re-use of waste, but this not dealt with by the development strategy.
14. The risk of pollution to water is reduced and water quality is improved.	O	The development strategy seeks to facilitate a significant increase in development across the district. This will result in an associated increase in population and activities, which may lead to greater risk of pollution to water unless there is sufficient infrastructure in place to manage water resources, including wastewater. The Pevensy Levels hydrological catchment has particular drainage requirements, in relation to water quality concerns in the Pevensy Levels Ramsar site. Water management standards can be set in the Local Plan, but this is not dealt with by the development strategy.
15. Ensure that Parks, gardens and countryside are protected, enhanced and made more accessible.	-	Whilst the development strategy seeks to prioritise development within and around existing settlements and urban areas, where there are opportunities for the re-use of brownfield land, although it will inevitably also result in new development coming forward within the countryside, including the National Landscape; and may therefore to some extent compromise objectives around protection of the countryside.

16. Economic performance is improved.	++	The development strategy seeks to facilitate a significant increase in development across the district. It is expected that opportunities will arise with economic sectors associated with construction and infrastructure, as well as support for the vitality and viability of town and local centres, and other employment areas, through the additional growth in population.
17. There are high and stable levels of employment and diverse employment opportunities for all.	++	The development strategy seeks to facilitate a significant increase in development across the district, including for business space and commercial uses, having regard to identified employment needs of the district.
18. Levels of poverty and social exclusion are reduced, and the deprivation gap is closed in the more deprived areas.	+	The strategy will help to facilitate new housing and commercial development, which can help to address the determinants of health and wellbeing and inequality, and deprivation. However, it is uncertain the extent to which the local population, particularly in more deprived areas, will be able to access new housing and employment opportunities.
19. Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve.	++	The development strategy seeks to facilitate a significant increase in development across the district, including for business space and commercial uses, having regard to identified employment needs of the district. The strategy will also support the vitality and viability of town and local centres, by focussing new development within and around them. This is likely to provide for more employment and training opportunities. Provision of education and skills is also dependent on social infrastructure provision, which is not specifically dealt with by the development strategy.
20. Road congestion levels are reduced and there is less car dependency and greater travel choice.	O	The strategy seeks to facilitate a significant increase in development across the district. This will result in an associated increase in population and a greater volume of vehicles. Whilst locating new development within and around existing settlements may enable and support modal shift; a level of car use/reliance is expected given the largely rural nature of the district and existing public transport infrastructure provision and services. There are existing issues with traffic and congestion along some key routes and other locations, and these may be amplified by the proposed strategy unless the impacts of new development are appropriately mitigated.

Figure 16: SA of the Development Strategy (Policy SS1) – Regulation 19 Rother Local Plan (including gypsies, travellers and travelling showpeople)

Spatial Development Options	Description/Vision	1 Air pollution	2 Biodiversity	3 Climate Change	4 Water Consumption	5 Flooding	6 Coastal Erosion	7 Health and Well-being	8 Housing	9 Accessibility to services	10 Safe Environments	11 Historic Environment	12 Pollution	13 Waste and Recycling	14 Water Pollution	15 Natural Landscape	16 Economic Performance	17 Employment Levels	18 Deprivation	19 Skills and Education	20 Transport	Score	Summary
SDO-LP: Local Plan preferred approach (Policy SS1)	Growth, new development and supporting infrastructure directed to the following broad locations: - West and North Bexhill; - The towns of Battle and Rye, along with the clusters of villages based around them; - Settlements on radial routes connected to the main urban areas of Bexhill and Hastings - Hastings Fringes - Urban intensification and redevelopment across the district in appropriate and sustainable brownfield site locations; - Sensitive development in other rural settlements of the district; and - Growth along the A21 corridor, focussed within and around existing larger settlements. This is a combined option comprising options SDO1, SDO2, SDO3A, SDO4, SDO5, SDO6, SDO11, SDO13, SDO-GTTS1 and SDO-GTTS2.	++	0	-	-	-	0	0	++	++	+	0	0	-	0	-	++	++	+	++	0	5	An overall positive strategy to focus growth and appropriately intensify development within and around existing settlements, and sustainable locations informed by the Settlement Study, together with focussed growth along the A21 corridor and settlements on radial routes connected to the main urban areas of Bexhill and Hastings. The strategy broadly focusses new development in areas that have comparatively good transport connections, including railway stations, given existing provision in the district, and that are or can be supported by local services, facilities and other supporting infrastructure. Whilst some development would take place in the countryside and the National Landscape, the strategy broadly seeks to direct new development away from these areas, as well as protected nature sites.

Figure 17: Summary of Development Strategy – Regulation 19 Rother Local Plan

Spatial Development Strategy Options	Score	1. Does this have a significant effect on the SA objective(s), whether positive or negative? State Y/N	2. Is the likely Impact? Negative (-1)	2. Is the likely Impact? Neutral (0)	2. Is the likely Impact? Positive (1)	3. Is this a temporary or permanent Impact? State T or P	4. Is this a short term or long term impact? State ST or LT	5. Are there synergies between other policies (or options) which might amplify the effect? State Y or N	6. Commentary/Notes Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score
SDO-LP: Local Plan preferred approach (Policy SS1)	6	Yes – positive impact overall			☒	Permanent	Long Term	Yes, the preferred approach comprises a number of in principle options where interrelate with one another. For this part of the SA, the strategy is considered independent of other Local Plan ‘thematic’ strategic and development management policies, which can play a role in mitigating identified adverse impacts, or improving neutral or positive impacts.	The score reflects the cumulative long-term impacts anticipated to arise through the introduction of significant amount of growth and new development in the district over the plan period. Whilst this will have likely positively impacts in addressing the local development needs (particularly for housing, as a critical mass of new homes are delivered, including affordable housing), it is also likely to result in some adverse impacts on some of the SA objectives, particularly on the environment, unless appropriate mitigation measures are put in place.

Health Impact Assessment

Figure 18: Health Impact Assessment of Development Strategy – Regulation 19 Rother Local Plan (including gypsies, travellers and travelling showpeople)

HIA Screening	Proposed Development Strategy (including proposed sites and distribution of development across the 5 sub-areas)	Proposed Strategy for Gypsies, Travellers and Travelling Showpeople
Will the policy have a direct impact on health, mental health and wellbeing?	Yes	Yes
Will the policy have an impact on social, economic and environmental living conditions that would indirectly affect health?	Yes	Yes
Will the policy affect an individual’s ability to improve their own health and wellbeing?	Yes	Yes
Will there be a change in demand for or access to health and social care services?	Yes	Yes
Full HIA Criteria	Proposed Development Strategy	Proposed Strategy for Gypsies, Travellers and Travelling Showpeople
What are the direct impacts on health, mental health and wellbeing? (e.g. ill health, social exclusion, isolation, non-participation, safety)	Ability for people to live nearer to health facilities, supported by open space and infrastructure that will enable people to live well. Development spread across the district, therefore growth of facilities and infrastructure supported across the whole district. Minimises isolation in rural locations and allows community cohesion and living well locally.	The provision of an appropriate number of pitches over the lifetime of the Local Plan will ensure that the needs of this section of community can me met, supporting their overall health and wellbeing and integration into society and ability to access health care needs.
What are the indirect impacts on health, mental health and wellbeing? (e.g. housing, transport, child development, education, employment opportunities, green space/nature, accessibility, air/noise/light quality and climate change adaption)	Linked employment opportunities and better quality of life. This leads to overall better mental health and greater participation in community activities.	Linked employment opportunities and better quality of life. This leads to overall better mental health and greater participation in community activities.
What are the opportunities for self-improvement? (e.g. ability to be physically active, choose healthy food, access to services/employment/education)	Access to services and facilities will be improved, with supporting infrastructure, such as education and sustainable transport infrastructure.	Access to services and facilities will be improved, with supporting infrastructure, such as education and sustainable transport infrastructure.

What change in demand for services will there be? (e.g. Primary Care, hospital care, community services, mental health, social services)	There will be a significant increase in the demand for services as population grows, especially in the larger towns. This will apply across the board to all infrastructure and new and improved services and facilities will be required to cater for the growth.	There will be an increase in the demand for services in specific locations across the district. This will apply across the board to all infrastructure and new and improved services and facilities will be required to cater for overall growth. Health care provision and education will need to factor in proposed growth.
What impacts will there be on planetary health? (e.g. climate change mitigation)	The development strategy alone will not help deliver climate change measures, but alongside the principles of green to the core and live well locally, development can be sensitive and help to deliver climate change mitigation.	The development strategy alone will not help deliver climate change measures, but alongside the principles of green to the core and live well locally, development can be sensitive and help to deliver climate change mitigation.
Who will it effect, and will there be particular impacts on certain vulnerable groups? (e.g. older people, young, disabled, low income)	The development strategy will impact all groups of society, and together with other policies in the plan aims to bridge the gap between the most and least deprived in society by providing equal opportunities and access. A range of housing and employment growth opportunities will help all members of society in living well locally.	This part of the development strategy will cater for the needs of a specific group. Together with other policies in the plan, the policies will seek to address exclusion and deprivation providing equal opportunities and access. A range of housing and employment growth opportunities will help all members of society in living well locally.
How will negative impacts be mitigated?	Site allocations will ensure infrastructure needed to support development will be delivered along with adequate open space to support health and wellbeing.	Site allocations and other policies will ensure infrastructure needed to support development will be delivered along with adequate open space to support health and wellbeing.
How will positive impacts be enhanced?	The delivery of the development strategy alongside the key policies in the plan in relation to green to the core and live well locally will ensure that significant health and wellbeing benefits can be delivered alongside proposed new growth.	The delivery of the development strategy alongside the key policies in the plan in relation to green to the core and live well locally will ensure that significant health and wellbeing benefits can be delivered alongside proposed new growth.
Recommendations for policy changes.	No further recommendations.	No further recommendations.

Figure 19: SA of the Chapter 2 (supporting spatial strategy policies) - Regulation 19 Rother Local Plan

Local Plan policy	Title	1 Air pollution	2 Biodiversity	3 Climate Change	4 Water Consumption	5 Flooding	6 Coastal Erosion	7 Health and Well-being	8 Housing	9 Accessibility to services	10 Safe Environments	11 Historic Environment	12 Pollution	13 Waste and Recycling	14 Water Pollution	15 Natural Landscape	16 Economic Performance	17 Employment Levels	18 Deprivation	19 Skills and Education	20 Transport	Score
INF1	Strategic infrastructure requirements	O	+	O	O	+	+	++	O	+	+	O	+	O	+	O	+	O	+	O	++	13
INF2	Transport connectivity, decarbonisation & mitigation	+	O	+	O	O	O	+	O	++	+	O	O	O	O	O	+	O	+	O	++	9
SS3	Development boundaries	O	+	O	O	O	O	O	O	+	O	O	O	O	O	+	O	O	O	O	+	4
SS4	Strategic green gaps	O	+	O	O	O	O	O	O	+	O	O	O	O	O	+	O	O	O	O	+	4
SS5	Strategy for the countryside	O	+	O	O	O	O	O	+	+	O	+	O	O	O	+	+	O	+	O	+	8
ECO6	Strategy for accommodation needs of gypsies, travellers & travelling showpeople	O	O	O	O	O	O	O	++	+	+	O	O	O	O	O	O	O	+	O	O	5

Reasons for selecting the preferred approach for the Development Strategy

4.77. The preferred approach for the Development Strategy is a combination of options, comprising the following: SDO1, SDO2, SDO3A, SDO4, SDO5, SDO6, SDO11, SDO13 along with SDO-GTTS1 and SDO-GTTS2 meaning that growth, new development and supporting infrastructure would be directed to the following broad locations:

- West and North Bexhill;
- The towns of Battle and Rye, along with the clusters of villages based around them;
- Settlements on radial routes connected to the main urban areas of Bexhill and Hastings
- Hastings Fringes
- Urban intensification and redevelopment across the district in appropriate and sustainable brownfield site locations;
- Sensitive development in other rural settlements of the district including those with train stations or sustainable transport alternatives; and
- Growth along the A21 corridor, focussed within and around existing larger settlements.
- Gypsy, Traveller and Travelling Showpeople sites will be allocated and permitted according to site selection and windfall criteria and identified need.

4.78. The Council's reasons for selecting the option are as follows:

The Sustainability Appraisal of the preferred option for the Development Strategy demonstrates it is a sustainable option overall, when assessed against the objectives in the SA Framework.

The Council's selection of the preferred option is set in the context of the significant land-use constraints to new major development within Rother, including the High Weald National Landscape (which covers 83 per cent of the district) and internationally or nationally protected habitats sites (which cover 7 per cent of the district). Whilst this does not preclude new development from coming forward within the National Landscape, this must be carefully managed as the Council has a legal duty to seek to further the statutory purpose of National Landscapes. The overall approach has been considered through landscape sensitivity testing, which provides the basis for policy interventions at the site-specific level (i.e., site allocations, strategic and development management policies) to ensure landscape is appropriately considered through the development management process.

To help avoid and mitigate adverse impacts on the natural and historic environment, as well as the district's distinctive landscape and rural character, a key principle of the preferred option is to locate new development within and around existing settlements. Further, these are considered to be sustainable locations in that they generally benefit from a good level of provision of services and facilities, which can help to ensure public access to these, as well as to provide a logical spatial focus for their future improvement or expansion. Existing settlements are also comparably better served by public transport than other parts of the district. The preferred option therefore includes urban extensions to the North and West of Bexhill, the district's principal centre, along with development at the Hastings Fringes, Rye and Battle, including by taking advantage of radial links to existing settlements.

This preferred option is particularly important in addressing the SA objectives around climate change mitigation and transport, where there will be opportunities to promote and better facilitate transport modal shift

away from car use, and reduce carbon emissions from transport, with additional benefits for health and wellbeing through active travel; however as the SA indicates, negative effects are still anticipated from pollution and emissions owing the largely rural nature of the district and existing provision of strategic transport infrastructure, which will mean a continued level of car reliance, together with the emissions associated with residential and commercial uses through growth in residential and commercial uses.

Focussing development within the established settlements will also help to make the optimal use of land through sensitive intensification, helping to ensure that Development Strategy is underpinned by opportunities for the use and renewal of brownfield or previously developed land, which can have positive effects on SA environmental objectives.

The preferred option is also informed by findings of the Housing and Economic Land Availability Assessment (HELAA), which has identified land which is suitable, achievable and available for development. Whilst acknowledging, some of the options have been discounted because they are unlikely to be feasible, given the latest information on sites. This includes the proportional growth options (SDO8 and SDO9), and an option for new standalone settlement (SDO7), owing to lack of identified suitable sites to facilitate these.

The option for focussing growth in identified strategic gaps (SDO14) has relatively low scores on some of the SA objectives, particularly in comparison to other options. Whilst this option would enable the delivery of new development to meet identified needs, particularly for housing, the Council considers that it would undermine the principal intent of the strategic gaps; which is to maintain the separate identity and distinctiveness between settlements; to maintain the strategic settlement pattern;

and to prevent the coalescence of settlements.

The delivery of a new multi-modal corridor along the A21 has been discounted at this time, in response to consultation feedback on the Regulation 18 draft Local Plans, and subsequent discussions with key stakeholders. Representations to the consultation, including from statutory bodies, have raised concerns with the deliverability of this option due to a lack of identified funding and justification for potential works to the Strategic Road Network, and need for further cross-boundary discussions with relevant authorities. Rather than wholesale growth along all settlements within the A21 corridor, the preferred option is therefore for focussed development only within and on the edges of those larger settlements which already have a level of services and facilities and offer existing opportunities for sustainable travel (including improvements to bus services, cycling and walking infrastructure).

The Development Strategy will help to facilitate a significant uplift in housing supply, and further development for economic uses. The strategy is therefore likely to have significant positive effects in terms of the housing and employment related SA objectives. When considered alongside development density options (discussed later in the SA), the Council acknowledges that housing delivered in accordance with the strategy will fall short of meeting the Governments Local Housing Need figure for the district in full; however, it still provides the basis for boosting supply and delivery well beyond the levels in the extant plan and recent delivery rates.

Suggested mitigation measures

- 4.79. In light of the findings of the SA of the preferred option for the Development Strategy, the following mitigation measures have been suggested, as set out in **Figure 20**. These mitigation measures are not exclusively for the Development Strategy

policy and may be addressed elsewhere in the Local Plan. This may include site allocation policies, strategic policies for thematic topic areas, and/or development management policies. The mitigation measures can work together with the Development Strategy to help address negative scores identified, and/or to improve scores particularly for neutral or negative scores on specific SA objectives.

- 4.80. It is noted that these mitigation measures were recommended at the Regulation 18 stage of the plan process and have been incorporated into the Regulation 19 version of the plan, both through thematic policy area and site allocation policies, as well as the preparation of the Local Plan evidence base.

Figure 20 – Suggested mitigation measures for the Development Strategy

SA Objective	Suggested mitigation measures
1. Reduce air pollution from transport and development and improve air quality.	• Undertake a detailed Transport Assessment of the Development Strategy and corresponding site allocations to inform potential mitigation measures • Make provision for public realm enhancements to encourage and enable active travel • Make provisions for new development to include green infrastructure, particularly where it is located next to the highway network • Seek timely delivery of new and improved public transport infrastructure, working with relevant bodies on the Infrastructure Delivery Plan
2. Biodiversity is protected, conserved and enhanced.	• Seek to protect existing habitats sites, including by locating new development away from them • Ensure new developments provide green buffers where they are located in proximity to habitats • Make provisions for Biodiversity Net Gain to be delivered on-site and where not possible, ensure appropriate mechanisms for the delivery of off-site contributions • Ensure the Local Plan aligns with the Local Nature Recovery Strategy
3. The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation)	• Include standards for energy use and carbon reduction which follow the energy hierarchy • Seek to maximise opportunities for the creation and use of decentralised energy networks and renewable energy • Seek opportunities to support modal shift, such as the delivery of new and improved public realm and strategic public transport infrastructure
4. Minimise water consumption.	• Include standards for water efficiency in new development
5. Manage and reduce the risk of flooding (fluvial, tidal and surface water), now and in the future, and increase resilience to the wider effects of climate change.	• Seek to locate new development away from areas at risk of flooding, both on an area and site wide basis • Undertake Level 2 Strategic Flood Risk Assessment, together with sequential and exception tests for site allocations • Include policies to ensure Sustainable Drainage Systems (SuDS) are incorporated into new development • Seek timely delivery of new and improved infrastructure for water management and flood defences, working with relevant bodies on the Infrastructure Delivery Plan • Include requirements for phasing of development and/or infrastructure delivery
6. The risk of coastal erosion is managed and reduced, now and in the future.	• Seek to locate new development away from the coastline • Identify a coastal management area and set policies which align with the Inshore and Offshore Marine Plan
7. The health and well-being of the population is improved and inequalities in health are reduced.	• Seek opportunities to promote access to recreation and open space • Seek to improve and expand opportunities for movement by walking, cycle and other active travel modes • Ensure the timely delivery of community infrastructure as new development comes forward, or where there are existing deficits in provision, in accordance with the Infrastructure Delivery Plan • Require Health Impact Assessments to be completed on new development
8. More opportunities are provided for everyone to in a suitable home to meet their needs.	• Set requirements to address housing need by tenure, size and type (including affordable housing) together with overall quantum of housing
9. All sectors of the community have improved accessibility to	• Seek to locate development in areas which benefit from existing provision of services, facilities and community infrastructure

services, facilities, jobs, and social and cultural opportunities.	Identify gaps in provision of community infrastructure through the IDP, and set policies to secure new or improved provision, including delivery on-site where appropriate
10. Safe and secure environments are created and there is a reduction in crime and fear of crime.	Set development requirements and standards for new development, informed by the National Design Guide
11. Historic environment/ townscape is protected, enhanced and made more accessible.	- Set policies to protect the significance of heritage assets and their setting - Require heritage assessments to be submitted at the planning application stage - Set policies for sustainable retrofitting of heritage assets
12. The risk of pollution to land and soils is reduced and quality is improved.	- Seek to locate new development giving priority to brownfield land and sites - Seek to locate development in areas of lower grade agricultural land - Set policies to ensure investigations are undertaken on contaminated land, and remediation measures undertaken where necessary
13. Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced.	- Set policies to ensure new development includes appropriate facilities for waste management and recycling - Set policies to promote circular economy principles, having regard to the waste hierarchy
14. The risk of pollution to water is reduced and water quality is improved.	- Seek timely delivery of new and improved water and wastewater infrastructure, where necessary, working with relevant bodies on the Infrastructure Delivery Plan - Incorporate Sustainable Drainage Systems (SuDS) in new development, to ensure higher water quality discharges - Where appropriate, set standards for water filtration
15. Ensure that Parks, gardens and countryside are protected, enhanced and made more accessible.	- Seek to avoid locating new development in areas, and at parts of sites, of highest landscape sensitivity - Set development standards and guidelines in relation to landscape protection and enhancement - Take account of the National Landscape (AONB) management plan in the layout and design of new development - Set policies to protect public open space
16. Economic performance is improved.	- Ensure employment land is protected, and new land is allocated where there is an identified need, together with ensuring a wide range of business space - Support and reinforce the role of existing town and local centres, to ensure their vitality and viability, including by locating new development within and around them
17. There are high and stable levels of employment and diverse employment opportunities for all.	- Seek planning contributions for employment, skills and training - Set policies to ensure a sufficient provision of business space
18. Levels of poverty and social exclusion are reduced, and the deprivation gap is closed in the more deprived areas.	- Identify and map areas of deprivation in the district - Seek transport access and public realm enhancements to and within key employment locations, including town and local centres
19. Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve.	Seek planning contributions for employment, skills and training
20. Road congestion levels are reduced and there is less car dependency and greater travel choice.	- Undertake a detailed Transport Assessment of the Development Strategy and corresponding site allocations to inform potential mitigation measures - Make provision for public realm enhancements to encourage and enable active travel

	• Seek timely delivery of new and improved public transport infrastructure, working with relevant bodies on the Infrastructure Delivery Plan
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SA of the development density options

Background and policy context

- 4.81. It is important to consider not only the distribution of new housing but also the appropriate density of housing in different locations. The NPPF states that “where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site”.²¹
- 4.82. Preliminary work on the draft Local Plan suggested that there was likely to be a shortfall of suitable and available sites to meet the Government’s Local Housing Need figure for Rother in full. Therefore, the Council considered various density options for development in different locations of the district. This was necessary to inform approaches to maximising housing delivery, as much as reasonably practical, to meet identified needs whilst ensuring that development densities are appropriate to their context.
- 4.83. As work on the plan progressed to the Regulation 19 stage, the Council’s assessment continued to confirm that there was a lack of suitable and available sites to meet the LHN figure in full. Therefore, the consideration of density options remained appropriate, and indeed necessary, throughout the plan process in order to comply with the NPPF.

Formulating the residential development density options

- 4.84. To support context-sensitive growth, Policy LWL1 of the draft Rother Local Plan (2024) divided Rother into five area types, each with tailored density expectations, as defined by Rother’s Density Study (2024). These density

figures are measured as dwellings per hectare (dph). This is shown in **Figure 20** below.

Figure 21: Density Options by Settlement Type (Policy LWL1, Draft Local Plan 2024)

Area Type	Density Range (dph)	Notes
Urban areas in Bexhill, Battle and Rye	60–90+ dph	Strong infrastructure and public transport
Suburban areas in Bexhill, Battle, Hastings Fringes and Rye	45–75 dph	Residential character, service proximity
Live Well Locally (Urban Edge of Bexhill)	45–60 dph	Planned strategic growth with new infrastructure
Villages with development boundaries	25–45 dph	Sensitive to historic and landscape context
Countryside (including villages and hamlets without development boundaries)	To reflect the existing character of the area	Rural character and policy constraints

- 4.85. After the first Regulation 18 consultation in 2024, and to inform the second Regulation 18 consultation document, the Council further examined whether these density expectations were appropriate, having regard to the need to optimise the use of land and maximise housing delivery. To explore and help assess the appropriateness of different density levels across Rother’s settlement types, three strategic ‘in principle’ options, or reasonable alternatives, were developed, as set out in **Figure 22** below.

²¹ NPPF (December 2024), paragraph 130.

Figure 22: Residential density options

Density option	Principle	Description
Option A. Business as usual	Current density standard and baseline for comparison.	Reflects density levels based on the adopted Development and Site Allocation Local Plan (including recently consented schemes). Urban areas (94 dph) Suburban areas (56 dph) Edge (Live Well Locally Areas) (21 dph)²² Village Areas (25 dph)
Option B. Higher density	Higher density with a moderate uplift in development density (compared to the baseline).	Urban areas (120 dph): Compact low-rise development at the lower end of the high-density spectrum. Suburban areas (60 dph): Low-rise development at the upper end of the medium-density spectrum. Live Well Locally Areas (40 dph): Low-rise development at the mid-range of medium density, located on the urban edge. Village Areas (35 dph): Low-rise development at the lower end of the medium-density spectrum, with a strong emphasis on rural character, landscape sensitivity, and integration with existing village form and scale.
Option C. Higher density plus	Higher density with a significant uplift in development density (compared to the baseline)	Urban areas (150 dph): Mid-to-high-rise development at the upper end of the high-density range. Suburban areas (75 dph): Compact low-rise development at the lower end of the high-density spectrum. Live Well Locally Areas (50 dph): Low-rise development at the higher range of medium density. Village Areas (40 dph): Compact low-rise development at the mid-range of medium density, located in rural settlements.

²² Live Well Locally areas are not designated or otherwise defined in the extant Local Plan. Edge of settlement areas have been used as a comparator for the purpose of this SA.

4.86. The density options were established for the purpose of considering reasonable alternatives for housing density that could potentially be delivered on sites, along with their implications for housing capacity across the district. These were based on good practice examples of higher density development achieved within the district as well as in other authority areas, including those with comparable attributes to Rother. The assessment of densities was based on assumptions of dwellings per hectare (dph) on sites, with ranges (and average densities within this range) which have been assigned for each of the area types.

4.87. Further information on the density considerations and options is set out in the Council's updated Density Study (2026).

Scenario testing of the residential density options

4.88. The residential density options set out above were 'scenario' tested to aid with understanding their implications for the amount (quantum) of housing development that could be delivered, in principle, both across the district and within the 5 sub-areas set out in the draft Rother Local Plan.

4.89. The scenarios were based on the proposed site allocation policies included in the draft Rother Local Plan (2026). They were calculated based on the following assumptions for site allocations that include residential uses:

- Where there is an extant planning permission or resolution to grant subject to legal agreement, then the capacity for a site allocation is based on the approved scheme. In this case, the development capacity figure is 'fixed'.

- For all other site allocations, the capacity is derived by applying the density options (standards), as set out in the Figure above, to the estimated 'developable area' of the site, as proposed in the draft Local Plan (2026).²³ In this case, the development capacity figure is 'not fixed', and can be adjusted based on different density assumptions in dwellings per hectare.
- Windfall development is not included in the calculations.

4.90. The residential capacity for individual sites is then combined to provide capacity figures for the district overall and each of the respective sub-areas. It is important to note that the residential capacity figures are indicative only and based on a 'policy off' assumption. This means that they do not respond to site specific matters or constraints, which may impact on layout, design and densities that may ultimately be achieved through the development management process.²⁴

4.91. The outputs of the scenario testing exercise are set out in **Figure 23** below.

²³ Not all of a site allocation area will necessarily be developed, as space may be required for public realm, access and servicing, utilities, open space and green infrastructure, etc., depending on site specific circumstances.

²⁴ The figures of the 'preferred approach' option for residential densities therefore do not correspond exactly with the capacity figure set out in the draft Local Plan (2026). Also, the density option is presented as an 'average' within a range of densities.

Figure 23: Residential development density scenario testing

Sub-area	Developable area (hectares) ²⁵ of site allocations	Option A capacity (units)	Option B capacity (units)	Option C capacity (units)
Bexhill	94	3,563	5,317	6,357
Southern Rother & Hastings Fringes	10	379	458	543
Battle and Surrounding Settlements	24	1,125	1,301	1,575
Rye and Eastern Settlements Cluster	22	931	1,190	1,429
Northern	31	718	959	1,078
Rother District	181	6,716	9,225	10,982

²⁵ Figures are rounded to the nearest whole number.

A note on employment densities

4.92. In preparing the Local Plan, the Council has drawn on the Housing and Economic Development Needs Assessment (HEDNA) (2024) and update (2026) for considering employment land and floorspace requirements. Where proposed site allocation policies include provision for employment floorspace, the site capacities have been informed by existing planning permissions and extant allocations, where relevant, or by applying the plot ratios for Rother as set out in the HEDNA²⁶, also taking account of individual site constraints.

Reasonable alternatives: additional considerations for the Regulation 19 plan

4.93. In response to consultation feedback, evidence and as part of the overall refinement of the Local Plan, the Council sought to better recognise and reflect the distinctive, historic character and attributes of the historic towns compared to the Bexhill urban area, in terms of the density approaches.

4.94. Therefore, a more nuanced approach to character areas of the historic towns of Battle and Rye was progressed. This sought greater flexibility for the range of appropriate densities within them. This approach is ultimately set out in the revised Policy LWL1 of the Regulation 19 Local Plan. Details of this are set out later in this sub-section.

4.95. It is not considered that the revised approach for the two historic towns substantively affects the overall assumptions for scenario testing of densities, as part of the SA process. Therefore, the approaches for 'business as usual', 'higher density' and 'higher density plus' remain valid for considering effects on the SA objectives.

4.96. Furthermore, the scenario testing, with overall numbers for the district and sub-areas, has not been revisited after the second Regulation 18 consultation. This is because the site portfolio has not been changed significantly between the Regulation 18 (2026) and Regulation 19 plans, and that the intention of the exercise is to take an overall view of growth scenarios for the purpose of the SA. The Council considers this to be a proportionate approach for the consideration of reasonable alternatives.

SA of the density options

4.97. The Development Density options and scenario testing of these have been assessed using the SA Framework, and findings are set out in **Figure 24** and **Figure 25** below.

4.98. When development densities are considered independently (i.e., in isolation of other Local Plan policies) and in the absence of mitigation measures, there are many uncertainties in the scoring against the SA objectives, and overall, the options all score negatively across the full complement of objectives.

4.99. Where likely positive effects are scored, this is owing to the options providing, to varying extents, support for the provision of more housing to meet identified needs, with significant positive effects for the higher density options (B and C). This is particularly important in the context of the NPPF and the Government's Local Housing Need calculation for Rother. The SA also scores positively for higher density options in terms of access to facilities and services, on the basis that the clustering of higher density development can enable more people to access services and facilities located in proximity to the development.

4.100. Negative impacts are generally associated with the increase in population with higher density development, which is likely to lead to increases in pollution and resource use (such

²⁶ HEDNA (2024), sets out a plot ratio for Rother of 0.3 for employment uses. The study also draws on the Employment Density Guide 3rd Edition (Homes and

Communities Agency, 2015), which is an industry standard.

as energy consumption) unless appropriately mitigated. In addition, higher density development may also have adverse impacts on heritage assets and their setting, as well as on landscape including its character.

4.101. One of the key uncertainties relates to SA objective 20 on transport. On the one hand higher density development is likely to increase the population locally and result in additional car use. However, higher density development also provides opportunities to facilitate sustainable transport and modal shift away from car use where it is located in areas that benefit from good public transport and provision of services and facilities.

Reasons for selecting the preferred approach for the residential density options

4.102. The reasons for selecting the preferred approach for the residential density option is to ensure the Local Plan makes the optimal use of land, consistent with national planning policy, together with seeking to meet identified development needs (particularly for housing) in the context of the significant development constraints in the district.

4.103. The preferred approach can help to facilitate a step change in housing delivery, as well as other development, whilst responding positively to Rother's distinctive local character, including its landscape and historic character. The appraisal of the options has identified a mix of scores for significant effects, and policy measures will be put in place to help ensure that development avoids or mitigates harm where higher density development is proposed.

Suggested mitigation measures

4.104. The following measures are suggested to help avoid or mitigate negative impacts and improve overall sustainability the Local Plan, in terms of residential development density:

- Ensure that development density is considered in relation to the Development Strategy for the district.
- Seek to ensure that developments with the highest densities are in locations in proximity to or with good access to public transport and with good provision of local services and facilities; or where this is not possible, set requirements to ensure new or improved provision is provided alongside higher density development.
- Include policies to ensure that higher density development is designed to avoid or mitigate impacts on heritage assets and landscapes, including the character of the National Landscape – this could be through Development Management policies or requirements on site allocation policies.
- Include policy requirements or standards to ensure new higher density development does not result in significant adverse impacts on local amenity.

Figure 24: SA of the Residential Development Density Options

Residential Development Density Options	Description/Vision	1 Air pollution	2 Biodiversity	3 Climate Change	4 Water Consumption	5 Flooding	6 Coastal Erosion	7 Health and Well-being	8 Housing	9 Accessibility to services	10 Safe Environments	11 Historic Environment	12 Pollution	13 Waste and Recycling	14 Water Pollution	15 Natural Landscape	16 Economic Performance	17 Employment Levels	18 Deprivation	19 Skills and Education	20 Transport	Score	Summary
Option A – Business as usual	Current density standard, in line with the adopted Local Plan, and baseline for comparison.	-	O	-	-	O	O	O	+	+	O	O	-	O	O	O	O	O	O	O	O	-2	Lower density levels should result in limited growth and development, which is not likely to have significant adverse effects on the environment (including pollution) and impacts on the climate. However very limited scope to address identified development needs, especially for housing. Scoring on many objectives uncertain.
Option B – Higher density	Higher density with a moderate uplift in development density (compared to the baseline).	--	O	-	-	O	O	O	++	++	O	-	-	O	O	-	+	O	O	O	O	-2	Higher density levels should result in more growth and development over baseline, which is likely to have adverse effects on the environment (including pollution) and greater impacts on the climate. However, this is likely to assist in meeting identified development needs, especially for housing. It is also likely to enable more people to live in proximity to services. Some economic benefits associated with increase in development, such as construction and professional services. Scoring on many objectives uncertain.
Option B – Higher density plus	Higher density with a significant uplift in development density (compared to the baseline)	--	O	-	-	O	O	O	++	++	O	--	-	O	O	--	+	O	O	O	O	-4	Higher density levels should result in more growth and development over baseline, which is likely to have adverse effects on the environment (including pollution) and greater impacts on the climate. Greater likelihood of adverse impacts on natural landscape and historic environment. However, this option is likely to assist in meeting identified development needs, especially for housing. It is also likely to enable more people to live in proximity to services. Some economic benefits associated with increase in development, such as construction and professional services. Scoring on many objectives uncertain.

Figure 25: Summary of the Residential Development Density Options

Spatial Development Strategy Options	Score	1. Does this have a <u>significant</u> effect on the SA objective(s), whether positive or negative? State Y/N	2. Is the likely Impact? Negative (-1)	2. Is the likely Impact? Neutral (0)	2. Is the likely Impact? Positive (1)	3. Is this a temporary or permanent Impact? State T or P	4. Is this a short term or long term impact? State ST or LT	5. Are there synergies between other policies (or options) which might amplify the effect? State Y or N	6. Commentary/Notes Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score
Option A – Business as usual	-2	No – mainly neutral impact	☒			Permanent	Long Term	Yes, linkages to the Development Strategy	The consideration of long-term and cumulative impacts assumes that all site allocations are delivered within the plan period.
Option B – Higher density	-2	Yes – both positive and negative impacts	☒			Permanent	Long Term	Yes, linkages to the Development Strategy	The consideration of long-term and cumulative impacts assumes that all site allocations are delivered within the plan period.
Option B – Higher density plus	-4	Yes – both positive and negative impacts	☒			Permanent	Long Term	Yes, linkages to the Development Strategy	The consideration of long-term and cumulative impacts assumes that all site allocations are delivered within the plan period.

The preferred approach and reasons for selecting this

4.105. Having considered the SA, the Council's preferred option for residential density is Option B (Higher density).

4.106. Option B is preferred as higher density development can help to facilitate a significant step change in provision of housing to meet identified needs – well above the baseline that could be delivered through the densities associated with the extant Local Plan. This is particularly important in the context of the Government's Local Housing Need figure for the district.

4.107. Option C (Higher density plus) is not preferred. Whilst this option is also likely to facilitate the delivery of new housing over and above the baseline, it presents the likelihood of more significant negative effects on the SA objectives than Option B, particularly with respect to the historic environment and landscape, including landscape character. The potential adverse impacts are notable for Option C, as scenario testing suggests it will not result in a substantive increase on the overall development capacity compared to Option C, but comes with considerably greater risks to sustainability.

4.108. Option A is also not preferred. Whilst this is likely to have comparably less adverse effects across the SA objectives than Options B and C, it would likely result in a considerable shortfall in the delivery of new housing to meet identified needs.

4.109. The Council acknowledges that support for higher density development will require careful consideration through the plan process and the inclusion of necessary and appropriate mitigation measures to ensure that potential adverse impacts on the SA objectives are avoided or mitigated.

4.110. For the Local Plan, the preferred approach is presented both as a density range and an average density for each area type, to reflect the diversity of housing forms and layouts

within each context. The range captures the flexibility needed to respond to site-specific circumstances, design aspirations and infrastructure capacity, while the average offers a clear benchmark for strategic planning and comparative analysis. This dual approach supports more nuanced decision-making and avoids oversimplifying the character of different area types. This is set out in **Figure 26** below.

4.111. It is important to note that the actual density that will be delivered on sites across the district will be determined on a case-by-case basis, through the development management process and having regard to the adopted Local Plan.

Figure 26: Preferred approach for residential development density (Regulation 18 2026)

Area Type	Option B (Higher density)
Urban areas in Bexhill, Battle and Rye	110 – 125 dph (avg. 120)
Suburban areas in Bexhill, Battle, Hastings Fringes and Rye	45–75 dph (avg. 60)
Live Well Locally (Urban Edge of Bexhill)	35–55 dph (avg. 40)
Villages with development boundaries	25–45 dph (avg. 35)
Countryside (including villages and hamlets without development boundaries)	None assigned - in response to local context

Figure 27: Local Plan approach for residential development density, as per Policy LWL1 (Regulation 19 2026)

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

Suggested mitigation measures

4.112. The following measures are suggested to help avoid or mitigate negative impacts and improve overall sustainability the Local Plan, in terms of residential development density:

- Ensure that development density is considered in relation to the Development Strategy for the district.
- Seek to ensure that developments with the highest densities are in locations in proximity to or with good access to public transport and with good provision of local services and facilities; or where this is not possible, set requirements to ensure new or improved provision is provided alongside higher density development.
- Include policies to ensure that higher density development is designed to avoid or mitigate impacts on heritage assets and landscapes, including the character of the National Landscape – this could be through Development Management

policies or requirements on site allocation policies.

- Include policy requirements or standards to ensure new higher density development does not result in significant adverse impacts on local amenity.

SA of the sub-area visions

Background

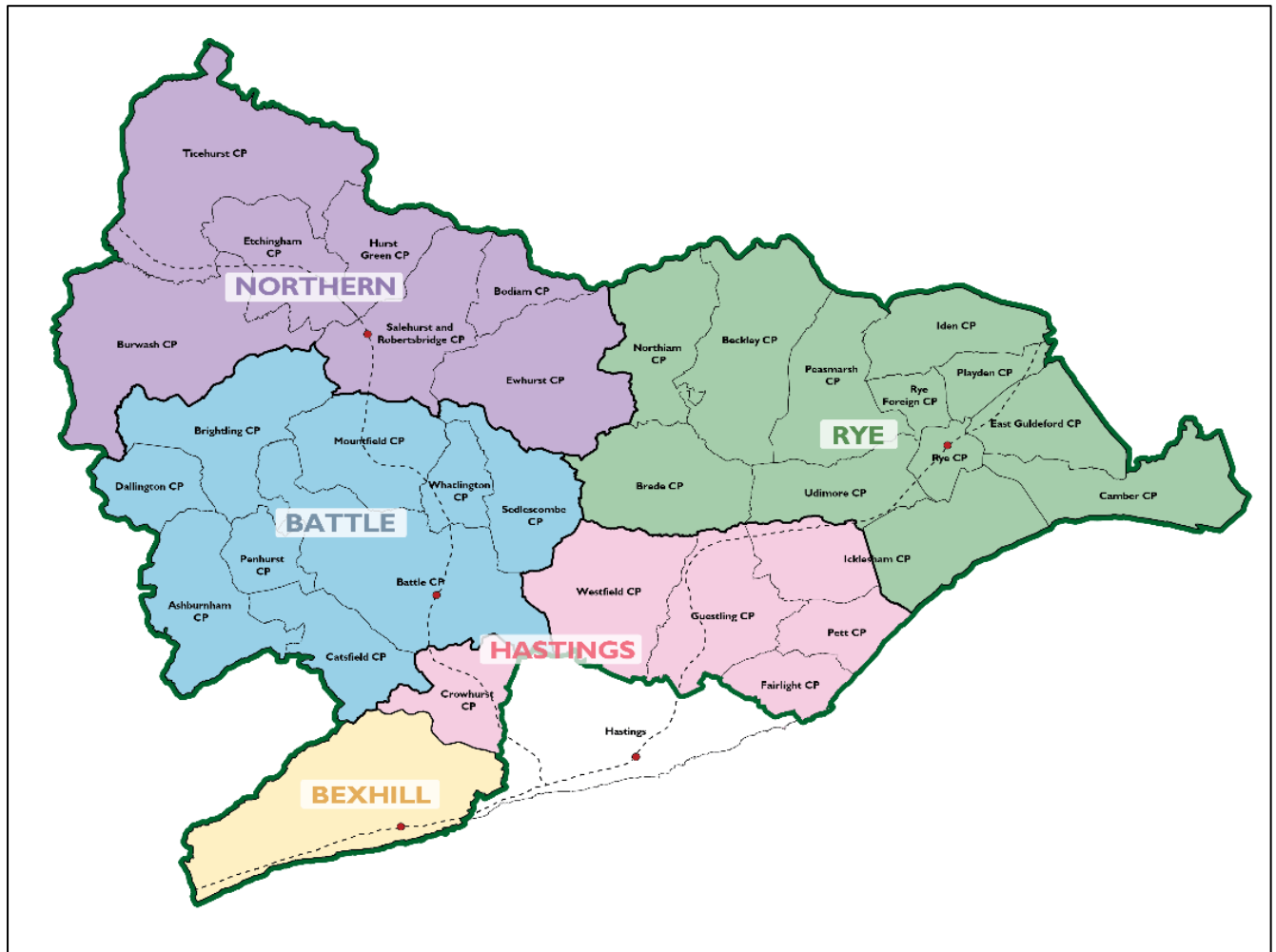
4.113. The draft Local Plan (2024) identified 5 geographic sub-areas of Rother. These were presented as a way for the plan to focus on the delivery of the proposed Development Strategy for the district at a more localised level. For each sub-area, the plan included a ‘vision statement’ and indicative development figures, which were disaggregated from the overall development figures for the district. It was noted that the ‘countryside’ was a feature of all of the sub-areas but did not comprise a sub-area in itself. The sub-area visions do not comprise specific policies within the Local Plan, but they help to set a picture for how the sub-areas will develop during plan period.

4.114. The sub-areas, including their boundaries, have been retained in the Rother Local Plan – Proposed Submission version. These are shown in **Figure 28** below.

4.115. The Interim Sustainability Appraisal (2024) included an assessment of the sub-area visions and their respective distribution of housing and employment development as part of the Development Strategy for the Local Plan.²⁷ The appraisal findings table is included below in this report for information. It should be noted that the cumulative and synergistic effects of the area visions were not appraised on the basis that these were considered as part of the wider development strategy.

²⁷ Rother District Local Plan 2020-2040, Interim Sustainability Appraisal (2024), pp. 87-89.

Figure 28: Rother Development Strategy sub-areas



Reviewing the updated sub-area visions

4.116. The sub-area visions and their associated indicative development figures were reviewed and updated in the draft Rother Local Plan – Development Strategy and Site Allocations (2026) document. They were also reviewed further as part of the preparation of the Regulation 19 version of the plan, particularly to ensure the indicative development figures accurately reflected the latest position on site availability and deliverability. For completeness, and as part of the iterative SA process, these changes are considered here to understand whether they may result in any changes to the initial SA findings.

4.117. This review is focussed on identifying the nature and extent of the changes to the sub-area visions, so to assess whether they are likely to result in substantive changes to the visions set out in the draft Rother Local Plan (2024) and Regulation 19 Local Plan (2026), and therefore, merit a re-appraisal of the initial SA on this matter. Further, the intention here is to review changes to the visions, rather than the indicative development figures. This is because considerations for the overall amount and distribution of growth over the plan period is necessarily covered by the SA of the Development Strategy, as set out earlier in this report.

4.118. **Figure 29** below provides a summary of the main changes to the visions for the respective sub-areas, along with commentary on the implications of this for the Interim Sustainability Appraisal (2024) findings, which are set out in **Figure 30**.

4.119. As set out below, whilst some amendments to the Rother Local Plan sub-area visions have been made during its early-stage production, these changes are not considered, on whole, to affect the overall appraisal of the visions set out in the Interim Sustainability Appraisal (2024). Figure 27 notes where the updated visions result in some limited changes to the sustainability scoring for selected SA objectives from the draft Local Plan (2024) to the draft Local Plan (2026), however these are

limited to specific sub-areas and do not apply to all of the sub-areas. Following a further review of the Regulation 19 plan, there are considered to be no further significant implications for the SA.

4.120. Notably, the most significant changes to the visions relate to the updated indicative development figures for housing and employment space, which are subject to SA as part of the Development Strategy, as set out previously in this report.

Figure 29: Review of Sub-area Visions

Sub-area	Summary of main changes to vision	Implications for Interim SA (2024) findings	Final SA Report commentary
Bexhill	- Change to emphasise growth will be ‘primarily’ in the urban area and on brownfield sites. - Change in indicative development figures for housing and employment space. - Change to emphasise development density maximised not only within proximity to town centres but also key transport connections. - Change to include improvements to station capacity (along with other measures) that will work with other measures to enhance connections between Bexhill and nearby settlements. - Signpost vision for improvements to health inequalities and wellbeing, enabling communities to lead healthy and active lifestyles. - Change to note that Bexhill will play an active role in the Pevensey Bay to Eastbourne Coastal Management Scheme.	- Changes to indicative development figures, which are to be assessed as part of the Development Strategy. - Greater focus on coastal management, which improves positive scoring for objective SA6. - Improvements to station capacity is positive for objective SA20 but does not affect scoring overall. - Changes to wording that clarify and reinforce principles of the vision, and outcomes sought, but are not considered to affect the SA scoring on whole.	- Changes to indicative development figures, which are assessed as part of the Development Strategy. - Otherwise, no significant implications from previous findings.
Southern Rother and Hastings Fringes	- Change from ‘small level of sensitive development’ to ‘sensitive development’. - Change in scope of transport improvements and connections and improved accessibility – from settlements linked radially to Hastings, to settlements in Southern Rother that are near to Hastings. - Inclusion of indicative development figures for housing and employment space in the vision.	- Changes to indicative development figures, which are to be assessed as part of the Development Strategy. - Changes to wording that clarify and reinforce principles of the vision, and outcomes sought, but are not considered to affect the SA scoring on whole.	- Changes to indicative development figures, which are assessed as part of the Development Strategy. - Otherwise, no significant implications from previous findings.

Sub-area	Summary of main changes to vision	Implications for Interim SA (2024) findings	Final SA Report commentary
Battle and Surrounding Settlements	- Change from higher density commercial development to sensitive commercial development, including through extensions to and densification of existing employment sites. - Change from a greater amount of sensitive growth will take place south of North Trade Road and west of Hastings Road, to south-west of Hastings Road. - Change from a 'small level of growth' to a 'reasonable level of growth' that will help support improving the overall sustainability and vitality of the cluster of villages around Battle. - Inclusion of indicative development figures for housing and employment space in the vision.	- Changes to indicative development figures – and change in emphasis on level of growth - which are to be assessed as part of the Development Strategy. - Changes to wording that clarify and reinforce principles of the vision, and outcomes sought, but are not considered to affect the SA scoring on whole.	- Changes to indicative development figures, which are assessed as part of the Development Strategy. - Otherwise, no significant implications from previous findings.
Rye and Eastern Settlements Cluster	Inclusion of indicative development figures for housing and employment space in the vision.	Changes to indicative development figures, which are to be assessed as part of the Development Strategy.	- Changes to indicative development figures, which are assessed as part of the Development Strategy. - Otherwise, no significant implications from previous findings.
Northern Rother	- Change from 'small-scale sensitive residential development and growth in villages' to 'sensitive residential development and growth in villages.' - Change to reflect lesser environmental impact from car use owing to EV use and related infrastructure. - Re-ordering of principle regarding opportunities for sensitive development in the short term, where sustainable and related to an existing settlement. - Revised wording around transport infrastructure and A21 sustainable transport corridor - Inclusion of indicative development figures for housing and employment space in the vision.	- Changes to indicative development figures – and change in emphasis on level of growth - which are to be assessed as part of the Development Strategy. - Reference to EV take-up likely to have positive effects on objectives SA1 and SA3 but do not change scoring. - Changes to wording that clarify and reinforce principles of the vision, and outcomes sought, but are not considered to affect the SA scoring on whole.	- Changes to indicative development figures, which are assessed as part of the Development Strategy. - Otherwise, no significant implications from previous findings.

Figure 30: Assessment of Sub-area Visions & Development, as set out in Interim Sustainability Appraisal (2024)

SA Objective / Sub-Area Visions & Development	Bexhill	Hastings Fringes	Battle	Rye & Eastern Settlements	Northern Rother	Commentary
1. Reduce air pollution from transport and development and improve air quality.	--	--	--	--	--	All sub-area strategy areas and associated growth will inevitably cause a negative impact against this objective, Additional population and vehicle use along with the construction of development will have a negative impact.
2. Biodiversity is protected, conserved and enhanced.	o	o	o	o	o	There will be opportunity for BNG in all sub-areas, but some biodiversity may be impacted by development. This will be managed on a site-by-site basis so overall impact should be neutral, no difference between sub-area.
3. The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation)	-	-	-	-	-	The development strategy and spatial areas vision alone will not be able to deliver this. Whilst the visions are aspirational and support climate change measures, inevitably growth will result in increased pressure, managed by other supporting policies in the Green to Core chapter of the Local Plan.
4. Minimise water consumption.	-	-	-	-	-	Water consumption cannot be reduced significantly through new growth and development; there will be additional pressure placed on water usage. Supportive policies to help reduce overall water consumption are found in other policies in the Local Plan.
5. Manage and reduce the risk of flooding (fluvial, tidal and surface water), now and in the future, and increase resilience to the wider effects of climate change.	o	o	o	o	o	The impact of flooding will be different in each sub-area, with each area having surface, groundwater and fluvial flooding constraints. This will be assessed on a case-by-case basis. Sites severely constrained by flood risk have not been identified for development
6. The risk of coastal erosion is managed and reduced, now and in the future.	+	o	+	+	+	Hastings Fringe has areas at higher risk, with land stability issue at Fairlight. This does not preclude development, but limits the development potential, therefore is neutral.
7. The health and well- being of the population is improved	++	++	++	++	++	The vision for sub-areas and supporting growth and development will ensure that people can live well locally

SA Objective / Sub-Area Visions & Development	Bexhill	Hastings Fringes	Battle	Rye & Eastern Settlements	Northern Rother	Commentary
and inequalities in health are reduced.						across the whole District, with better connections and access to healthcare within sub-areas.
8. More opportunities are provided for everyone to in a suitable home to meet their needs.	++	++	++	++	++	All sub-areas provide opportunity for a new housing of various size, type and tenure. Greatest growth proposed in Bexhill sub-area, but appropriate growth also identified to help meet needs in other sub-areas, therefore equally positive
9. All sectors of the community have improved accessibility to services, facilities, jobs, and social and cultural opportunities.	++	++	++	++	++	All sub-areas provide opportunity for growth in local economy and can act as a catalyst for improved services and facilities to cater for residential growth.
10. Safe and secure environments are created and there is a reduction in crime and fear of crime.	+	+	+	+	+	In all sub-areas, through community cohesion and mixed residential and commercial development with supporting infrastructure, crime and the fear of crime can be reduced.
11. Historic environment/ townscape is protected, enhanced and made more accessible.	+	+	+	+	+	Development within each sub-area will be sensitive to the historic environment. Therefore, an overall positive impact, but some small impacts may arise on a site by site basis.
12. The risk of pollution to land and soils is reduced and quality is improved.	o	o	o	o	o	This is a neutral impact for all sub-areas. Pollution can be controlled, but there may be some risk associated with development.
13. Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced.	-	-	-	-	-	The amount of waste cannot demonstrably be reduced through the growth strategy, it would require supportive policies, some of which are out of the control of planning policy.
14. The risk of pollution to water is reduced and water quality is improved.	o	o	o	o	o	This is a neutral impact for all sub-areas. Pollution can be controlled, but there may be some risk associated with development.
15. Ensure that Parks, gardens and countryside are	++	+	+	+	+	Open space of high importance can be protected, with greatest opportunity for protection in Bexhill area, in areas

SA Objective / Sub-Area Visions & Development	Bexhill	Hastings Fringes	Battle	Rye & Eastern Settlements	Northern Rother	Commentary
protected, enhanced and made more accessible.						outside High Weald National Landscape. Sensitive development will only occur in areas of the High Weald which is prevalent in each of the four other sub-area
16. Economic performance is improved.	++	++	++	++	++	The sub-area visions and development strategies identify opportunities for localised economic growth to support urban and rural communities.
17. There are high and stable levels of employment and diverse employment opportunities for all.	++	++	++	++	++	The sub-area visions and development strategies identify opportunities for localised economic growth and more diverse employment opportunities to support urban and rural communities.
18. Levels of poverty and social exclusion are reduced, and the deprivation gap is closed in the more deprived areas.	+	+	+	+	+	Development including affordable housing, and supportive infrastructure should support all of the community with sustainable communities enabling the poverty and deprivation gap to be narrowed.
19. Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve.	++	++	++	++	++	The sub-area visions and development strategies identify opportunities for localised economic growth with more skilled employment opportunities and
20. Road congestion levels are reduced and there is less car dependency and greater travel choice.	-	-	-	-	-	Whilst there will be sustainable transport alternatives, overall road congestion levels will inevitably not reduce. Transport interventions will be required to cater for additional growth.
SCORING	12	10	11	11	11	

Chapter 5:

Thematic topic area policies

This section discusses the preparation and Sustainability Appraisal of the strategic and non-strategic policies covering various thematic topic areas.

Introduction

- 5.1. This section of the report covers the preparation and appraisal of the thematic topic area policies included in the Draft Rother Local Plan (Regulation 19 version). It is organised according to the main chapters of the plan, for ease of reference.
- 5.2. For each of the main thematic policy topic areas, the Draft Rother Local Plan includes both strategic and non-strategic planning policies, as defined by the NPPF (2024). These policies have been prepared and refined throughout the plan process and informed by a wide range of considerations. These include the direction provided by national planning policy and legislation, public consultation and stakeholder engagement, evidence base documents and the Sustainability Appraisal.
- 5.3. In addition to setting out findings of the SA of the Draft Rother Local Plan thematic topic area policies, this section helps to explain how these policies have been developed. In particular, it focusses on the ‘reasonable alternatives’ that the Council has considered in preparing the policies and deciding on the ‘preferred approaches’ for the Local Plan.

Delivering New Homes

- 5.4. This section discusses the preparation and appraisal of the strategic and development management policies in the Regulation 19 Rother Local Plan, within the “Delivering New Homes” chapter
- 5.5. Specifically, it covers the following policies

HOU1	Mixed & balanced communities
HOU2	Affordable housing
HOU3	Rural exception sites & community-led development
HOU4	Sub-division of dwellings and Houses of Multiple Occupation
HOU5	Residential internal space standards

HOU6	Access standards
HOU7	Specialist housing for older people
HOU8	Residential care and nursing homes
HOU9	Gypsies, travellers & travelling showpeople
HOU10	Self-build & custom housebuilding
HOU11	New dwellings in the countryside
HOU12	Dwellings for rural workers
HOU13	External residential amenity areas
HOU14	Extensions to residential gardens in the countryside
HOU15	Residential extensions, alterations & outbuildings
HOU16	Annexes
HOU17	Boundary treatments & means of enclosure
HOU18	Accesses & drives

Reasonable alternatives considered at Regulation 18 (2024)

- 5.6. The reasonable alternatives for planning policies considered at the Regulation 18 stage were first set out in the Interim SA Report (2024). Further information on the background and Council’s reasons for the selection of these alternatives was included in the Housing Background Paper (April 2024).
- 5.7. The reasonable alternatives were organised according to 39 ‘policy areas’, which are set out below. For each policy area, the preferred approach taken forward in the draft Rother Local Plan (2024) is indicated by the **black highlighted** text.
- 5.8. **Appendix 4** includes a summary of the Sustainability Appraisal of these options. The summary duplicates information included in the Interim SA Report (2024). It has been included here for completeness and to meet the statutory requirements for SA reporting. The Interim SA Report (2024) should be referred to for further detailed information.

Affordable housing

Policy Area 1: Affordable Housing Percentage Requirements

- Policy Option 1A - Carry forward Policy DHG1 of the DaSA.
- Policy Option 1B - Carry forward Policy DHG1 of the DaSA but with minor changes to policy text to clarify requirements.
- Policy Option **1C** - A new affordable housing policy which simplifies the percentage requirements to reflect up to date viability evidence and simplifies the geographical areas.

Policy Area 2: Tenure split of affordable housing

- Policy Option 2A - Carry forward the split set out in Policy LHN1 of the Core Strategy
- Policy Option 2B - Do not include a recommended split in policy.
- Policy Option **2C** - Include a new split to reflect the findings of the HEDNA.

Policy Area 3: Size mix of affordable housing

- Policy Option 3A - Include requirements for the mix of different sizes in the policy.
- Policy Option 3B - Include no information about different sizes in the policy.
- Policy Option **3C** - Include some indicative information on likely sizes of affordable dwellings.

Policy Area 4: 100% Affordable housing sites

- Policy Option **4A** - Carry forward Policy LHN4 of the Core Strategy only, to allow for site allocations for 100% affordable housing. No new policy to guide planning applications for 100% affordable housing. Rely on general affordable housing policy and on Technical Advice Note.
- Policy Option 4B - Do not carry forward Policy LHN4 of the Core Strategy.
- Policy Option 4C - Carry forward Policy LHN4 of the Core Strategy, to allow for site allocations for 100% affordable housing, and include a new policy to guide planning application for 100% affordable housing developments.

Policy Area 5: Rural Exception Sites

- Policy Option 5A - Carry forward Policy DHG2 of the DaSA Local Plan with no changes.
- Policy Option 5B - Do not carry forward a policy on rural exception sites and instead rely on the NPPF.
- Policy Option **5C** - Update Policy DHG2 to allow sites to be brought forward by others.

Policy Area 6: Temporary Accommodation

- Policy Option 6A - A new policy to provide specific support for new temporary accommodation
- Policy Option **6B** - A new policy which supports Houses in Multiple Occupation (HMOs).

Policy Area 7: First Homes

- Policy Option 7A - A policy to set a require a higher minimum discount for First Homes of either 40% or 50% below market value, and/ or set a lower price cap for the first sale than the standard £250,000.
- Policy Option **7B** - Retain the nationally prescribed minimum discount and price cap.
- Policy Option 7C - A new policy to support First Homes Exception Sites.
- Policy Option 7D - No policy to support First Homes Exception Sites.

Housing mix

Policy Area 8: Requirement for smaller (1-2 beds) dwellings

- Policy Option 8A - Retain Core Strategy requirement (Policy LHN1 (ii): minimum 30% 1-2 beds in the rural areas).
- Policy Option 8B - Do not include a policy requirement relating to smaller dwellings, let the market decide.
- Policy Option **8C** - A new policy requirement that requires a minimum percentage of smaller dwellings in all areas.

Policy Area 9: Set Prescriptive Proportions for Sizes of Dwellings

- Policy Option 9A - A new policy requirement which sets out numbers of 1,2,3 and 4+ beds dwellings for all new developments in both the market and affordable sectors.
- Policy Option **9B** - Retain existing policy position, i.e. to require housing developments to be of a size, type and mix to meet current and projected housing needs.

Policy Area 10: Retaining smaller dwellings

- Policy Option **10A** - A new policy requirement that resists a net loss of dwellings numbers (e.g. conversion of flats into a house).
- Policy Option 10B - Retain existing policy position, i.e. no policy to resist the net loss of dwellings numbers.

Policy Area 11: Strategic Scale Developments

- Policy Option 11A - A new policy for strategic scale developments (e.g. 100+ dwellings) which requires them to deliver a range of tenures and housing suitable for different groups, and a variety of development models, such as community-led development, self- and custom-build and build to rent.
- Policy Option **11B** - Continue existing policy position with requirements set out in separate policies, i.e. 6+ dwelling schemes to provide for differing household types, proportion of affordable housing, proportion of self and custom build housing.

Older person's accommodation

Policy Area 12: Specialist Housing need for Older People

- Policy Option **12A** - A new policy for specialist housing for older people to replace the Core Strategy (CO5) and DaSA (DHG5) policies.
- Policy Option 12B - Take forward CS/DaSA policies with no changes.
- Policy Option 12C - Do not include a specific policy for older people's housing and instead rely on general housing policies.

Policy Area 13: Specialist Older People's Housing on Strategic Scale Developments

- Policy Option **13A** - Require a proportion of specialist accommodation for older people on all strategic scale residential developments.
- Policy Option 13B - Do not require a proportion of specialist accommodation for older people on all strategic scale residential developments.

Policy Area 14: Exception Sites Approach for Specialist Older People's Housing

- Policy Option **14A** - A new policy provision which allows for specialist schemes, in exceptional circumstances, outside development boundaries.
- Policy Option 14B - Do not include a new policy provision which allows developments outside development boundaries.

Policy Area 15: Care homes for Older People

- Policy Option **15A** - A new policy that specifically relates to care homes for older people.
- Policy Option 15B - No new policy, rely on existing policy approach (general older people's housing policies, retention of social facilities).

Policy Area 16: Bungalows/ Single Storey Living

- Policy Option 16A - A new policy that requires a proportion of bungalows/ single storey dwellings on all developments.
- Policy Option **16B** - No specific requirement but a more general requirement for housing schemes to suit a range of differing households, with encouragement for bungalows in the supporting text.

Specialist housing need: accessible and adaptable housing

Policy Area 17: M4(2) dwellings

- Policy Option **17A** - Retain existing policy requirement (all dwellings to meet M4(2) standard).
- Policy Option 17B - Take forward CS/DaSA policies with no changes.

Policy Area 18: M4 (3) dwellings

- Policy Option **18A** - Retain existing policy requirement (5% of housing to meet M4 (3) (b)

(wheelchair accessible standard) where there is a need on the housing register, as part of the affordable housing requirement). No additional requirement for M4 (3) (a) dwellings.

- Policy Option **18B** - Expand policy to require 5% of market housing to meet M4 (3) (a) standard (wheelchair adaptable dwellings).
- Policy Option **18C** - Expand policy to require 10% of housing to meet M4 (3) (b) (wheelchair accessible standard) where there is a need on the housing register, as part of the affordable housing requirement.

Specialist Housing Need: Self and Custom Build Housing and Community-Led Housing

Policy Area 19: Alternative policy approach for Self and Custom Housebuilding

- Policy Option 19A - Adopt an exception site approach which would allow for affordable housing SCHB developments on the edge of settlements.
- Policy Option 19B - Allocate sites for CSB.
- Policy Option **19C** – Retain existing policy.²⁸

Policy Area 20: Change to proportion of SCHB plots required and/or the threshold above which SCHB is required

- Policy Option **20A** - Require a higher or lower proportion than 5-10%, either throughout the district or in certain areas.
- Policy Option **20B** - Change the threshold from 20 dwellings, either throughout the district or in certain areas.

Specialist housing need: rural housing

Policy Area 21: Development Boundaries

- Policy Option **21A** - A new approach which would allow for small scale residential development outside development boundaries in “infill” plots or on the edges of settlements.
- Policy Option 21B - Retain existing policy approach but assess all development boundaries for potential areas of expansion and

all other areas of built form for their appropriateness for a new development boundary.

Policy Area 22: Align policy with paragraph 84 of the NPPF

- Policy Option **22A** - Duplicate the provisions of paragraph 84 of the NPPF but for all areas outside the development boundaries (not just isolated locations as provided for by paragraph 84).

Policy Area 23: Residential development of historic farmsteads

- Policy Option 23A - A new policy that supports the residential development of historic farmsteads.
- Policy Option **23B** - Rely on the existing policy approach for historic farm buildings (set out in Core Strategy policy RA4 which takes a hierarchical approach for re-use, prioritising agricultural use then commercial use and only then, residential use).

Policy Area 24: Agricultural workers' accommodation

- Policy Option **24A** - A new policy to support agricultural workers' accommodation.
- Policy Option **24B** - Additional policy support for affordable housing in rural areas.

Policy Area 25: Live-Work Units

- Policy Option 25A - A new policy to support live-work units which could take the form of a generally supportive policy within the development boundaries, an exception sites approach which would allow sites outside development boundaries, a policy which required a proportion of live-work units on all strategic developments of a certain size, or allocating land specifically for live-work units.
- Policy Option **25B** - No specific policy.

²⁸ This option was not specified in the Interim SA Report (2024) and Background Paper but was implied in the narrative; it has been included here for legibility.

Specialist housing need: gypsies, travellers and travelling showpeople

Policy Area 26: Development Management (criteria-based policy to guide planning applications)

- Policy Option 26A - Do not include a criteria-based policy, instead rely on site allocations.
- Policy Option **26B** - Update CS Policy LHN6.

Policy Area 27: Transit Sites

- Policy Option 27A - New policy for transit sites, including site allocation
- Policy Option **27B** - No site allocations for transit sites, continue current policy approach of including transit sites in overall criteria-based policy for traveller sites.

Specialist housing need: Houses of Multiple Occupation

Policy Area 28: HMOs

- Policy Option **28A** - A new policy to set out the circumstances in which a new HMO will be approved, and requirements for such developments.
- Policy Option 28B - No new policy but instead review Article 4 Direction covering central Bexhill and publish additional guidance to its application.

Specialist Housing Need: Build to Rent

Policy Area 29: Built to Rent

- Policy Option **29A** - A new policy to set out the circumstances in which build-to-rent development will be supported.
- Policy Option 29B - Site allocations for build-to-rent development, or a requirement to provide BTR as part of strategic housing developments above a certain size.

Specialist housing need: other

Policy Area 30: Housing for Families with Children

- Policy Option 30A - A new policy, or criteria within a general housing policy which supports developments of housing for families with children.

- Policy Option **30B** - Incorporate the needs of housing for families with children into other general housing policies

Policy Area 31 Second Homes and Dwellings as Holiday Lets

- Policy Option 31A - A new policy which would allow a planning condition/obligation to be attached to all permissions for new dwellings to restrict their use to that of a primary residence
- Policy Option 31B - A new policy, as above, but focused on specific geographical areas which currently have a higher concentration of second homes (e.g. Rye, Winchelsea, Camber).
- Policy Option **31C** - A new policy, as above, but only focused on new dwellings in the countryside, i.e. where new dwellings are exceptionally allowed outside the development boundary because they meet specific criteria.

Policy Area 32: Internal Space Standards

- Policy Option 32A - Retain the existing policy (DHG3) unaltered.
- Policy Option 32B - Do not include a policy requiring compliance with the NDSS.
- Policy Option **32C** - Retain the existing policy (DHG3) but with an additional requirement for all “studios” to meet the minimum internal space standard for a single bedroom.

External residential areas

Policy Area 33: Garden Size

- Policy Option 33A - Retain the existing policy requirements (DHG7 (i)) unaltered
- Policy Option 33B - Remove the requirement relating to garden length and rely on local design codes and Building for a Healthy Life
- Policy Option **33C** - Retain the requirement relating to garden length but add further detail into the policy text about exceptional circumstances where the requirement may be relaxed, also add further detail about how the external amenity space requirements apply to flats and maisonettes.

Policy Area 34: Car Parking and Cycle Storage

- Policy Option 34A - Retain the existing policy requirements (DHG7 (ii)) unaltered.
- Policy Option 34B - Remove the requirements for car parking and cycle storage and rely on County Council guidance, local design codes and Building for a Healthy Life.
- Policy Option **34C** - Retain the existing policy requirements but update these in line with current guidance, and requirements relating to EV charging points.

Development management matters relating to housing

Policy Area 35: Extensions to Residential Gardens

- Policy Option 35A: Delete policy.
- Policy Option **35B**: Retain policy.

Policy Area 36: Extensions, Alterations and Outbuildings

- Policy Option 36A - Delete policy.
- Policy Option **36B** - Retain policy.

Policy Area 37: Annexes

- Policy Option 37A - Delete policy.
- Policy Option **37B** - Retain policy.

Policy Area 38: Boundary Treatments and Means of Enclosure

- Policy Option 38A - Delete policy.
- Policy Option **38B** - Retain policy.

Policy Area 39: Accesses and Drives

- Policy Option 39A - Delete policy.
- Policy Option **39B** - Retain policy.

Reasonable alternatives considered at Regulation 18 (2026)

- 5.9. The following sub-section discusses further considerations for the reasonable alternatives for the housing policies at the Regulation 18 stage, as part of the preparation of the Draft Rother Local Plan – Development Strategy and Site Allocations (2026).

- 5.10. It is important to note that the Draft Rother Local Plan (2026) did not cover the full complement of thematic policy topic areas in the Draft Rother Local Plan (2024) document, as the former focussed principally on the development strategy for the district, area-based policies and site allocations. Therefore, the main intention of this sub-section is to signpost where there were interactions between the first and second draft Local Plans, and indeed, any implications for the reasonable alternatives.

Specialist housing need: rural housing

Policy Area 21: Development Boundaries

- 5.11. The Draft Rother Local Plan (2026), Part 3, Development Strategy included a sub-section and discussion on ‘development boundaries’ within the district. This was particularly in response to feedback from the first Regulation 18 consultation, where some respondents had suggested that the development boundaries of settlements in the district should be amended and enlarged, so to enable more development to come forward within them.
- 5.12. As set out in the Draft Rother Local Plan (2026), considerations for reviewing and defining the extent of settlement boundaries was made through the preparation of the proposed Development Strategy for the district and considered through the SA process. The Council’s preferred approach is to update the extent of the settlement boundaries through the Local Plan process, to reflect any additional site allocations within or around a settlement, once the site portfolio is confirmed. In addition, the approach will provide for a criteria-based policy to manage development proposals outside of the boundaries. Therefore, the Council considers it appropriate to carry forward the preferred approach from Policy Area 21 in the 2024 draft Plan. Also recognising that opportunities for development at the edge of or near existing settlements has been undertaken through the Housing and Economic Land Availability Assessment.

Specialist housing need: gypsies, travellers and travelling showpeople

Policy Area 26: Development Management (criteria-based policy to guide planning applications) for gypsy, travellers and travelling showpeople

Policy Area 27: Transit Sites

- 5.13. The Draft Local Plan (2026) included a discussion and update on the position regarding planning for the needs of the gypsy, traveller and travelling showpeople community.
- 5.14. It signposted the updated national Planning Policy for Traveller Sites (PPTS, updated 2024), which set out the requirement for the Council to assess the accommodation needs of this group and, through the Local Plan, set pitch targets for gypsies and travellers, and plot targets for travelling showpeople; as well as to make provisions to accommodate this need. Furthermore, the Plan provided the latest position of accommodation needs for this group arising in Rother district, which was derived through the joint Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (GTAA). The study is being prepared by Local Planning Authorities in East Sussex. This work continues to be developed, and interim findings were set out in the 2022 GTAA.
- 5.15. Informed by these findings, the Draft Rother Local Plan (2026) set out provisions to meet the identified need for this group arising in Rother, in full, via a suite of proposed site allocation policies. These sites were assessed through the Interim SA (2026). Considerations for meeting identified needs across East Sussex will continue to be explored by the group.
- 5.16. In terms of transit sites, the GTAA (2022) assessed needs for transit sites, which provide temporary accommodation for gypsy and traveller households travelling through the area. The assessment found that while there may be a need for additional transit provision in the county, there is currently insufficient evidence to determine

the number of additional transit pitches required. The draft Local Plan (2024) includes a criteria-based policy to assess any proposals that come forward for transit sites (Policy HOU11).

- 5.17. Accordingly, the Council considered it was appropriate to continue to carry forward the preferred approach from the 2024 draft Plan, which was for a criteria-based policy for this specific type of provision. The policy will also address accommodations needs for the wider gypsy, traveller and travelling showpeople community for windfall development, where sites are not allocated in the Local Plan.

Reasonable alternatives: additional considerations for the Regulation 19 Local Plan

- 5.18. The following sub-section discusses further considerations for the reasonable alternatives for the housing policies at the Regulation 18 stage, following the consultation on the Draft Rother Local Plan (2026), and as part of the preparation of the Rother Local Plan (Regulation 19 version).
- 5.19. The focus here is whether consultation feedback, new evidence, or changes to the policy context had any implications for the preparation of the policies in the 'Delivering New Homes' chapter, particularly the consideration of reasonable alternatives.

Affordable housing

Policy Area 1: Affordable Housing Percentage Requirements

Policy Area 2: Tenure split of affordable housing

Policy Area 3: Size mix of affordable housing

- 5.20. Following the second Regulation 18 consultation in 2006, the Housing and Economic Development Needs Assessment was updated. This provided updated information on local needs with respect to affordable. The preferred policy approaches were retained, with the plan amended to reflect findings of the HEDNA.

- 5.21. Furthermore, the scope for affordable housing requirements on was considered through the Local Plan Viability Assessment and informed the Regulation 19 policies.

Policy Area 7: First Homes

- 5.22. First Homes were a type of discounted market housing which qualified as affordable housing. First Homes were introduced through Government Planning Practice Guidance and a Written Ministerial Statement, which came into effect in June 2021. The concept was subsequently brought into the NPPF with requirements for Local Plans to set a minimum requirement of 25% of affordable homes as First Homes, and the draft Rother Local Plan (2024) responded to this. However, the updated NPPF (2024) removed provisions for First Homes. This policy area is therefore no longer relevant to the new Local Plan.

Housing mix

Policy Area 8: Requirement for smaller (1-2 beds) dwellings

Policy Area 9: Set Prescriptive Proportions for Sizes of Dwellings

- 5.23. The HEDNA Update (2026) provided updated information on local needs with respect to dwelling size and mix. The preferred policy approaches were retained, with the plan amended to reflect findings of the latest HEDNA.

Accessible and adaptable housing

Policy Area 17: M4(2) Dwellings

Policy Area 18: M4(3) Dwellings

- 5.24. Whilst the principle of ensuring provision of M4(2) and M4(3) dwellings was progressing in the Regulation 19 document, the scope for requiring such provision was considered through the Local Plan Viability Assessment and informed the Regulation 19 policies.

Specialist housing need: gypsies, travellers and travelling showpeople

Policy Area 26: Development Management (criteria-based policy to guide planning applications)

Policy Area 27: Transit Sites

- 5.25. As discussed previously in this sub-section, the Council has worked together with other East Sussex authorities on a joint GTAA. Consideration of accommodation needs for the gypsy, traveller and travelling showpeople community was informed by the updated evidence.
- 5.26. At the time of the publication of the Regulation 19 document, an update to the GTAA was in progress, but not finalised. This study will provide the latest assessment of need to the end of the plan period of 2042. The Local Plan makes provision for pitches to meet identified need, as per the 2022 GTAA. To provide flexibility to accommodate any potential additional needs arising from the GTAA update, an additional strategic approach to make clear that overall needs could be met through windfall development was progressed. The 'windfall' development policies for gypsies, travellers and travelling showpeople will therefore support appropriate development in this respect.

Appraisal of the Local Plan (Regulation 19)

- 5.27. The Sustainability Appraisal of the "Delivering New Homes" chapter in the Draft Rother Local Plan (Regulation 19 version) is set out in the tables below.
- 5.28. The first table provides an assessment of each of the proposed policies against the 20 objectives in the SA Framework. The second table provides an overall assessment of the chapter policies, when taking together, looking at the expected magnitude of any likely effects, duration of impacts and synergies with other policies in the Local Plan, considering also cumulative impacts.

Suggested Mitigation Measures

- 5.29. The following mitigation measures have been suggested to avoid and/or mitigate expected negative effects of implementing

the policies and improving their expected outcomes.

- Include criteria-based policies to ensure protection of landscape and landscape character where development is proposed outside of Development Boundaries, for example with rural exception sites and dwellings for rural workers; and/or provide cross-references to other relevant policies in the Local Plan.
- Ensure criteria for windfall development of gypsy, traveller and travelling showpeople accommodation so to enable development to come forward within the plan period, to meet any additional identified needs (i.e., updated evidence base).

Local Plan policy	Title	1 Air pollution	2 Biodiversity	3 Climate Change	4 Water Consumption	5 Flooding	6 Coastal Erosion	7 Health and Well-being	8 Housing	9 Accessibility to services	10 Safe Environments	11 Historic Environment	12 Pollution	13 Waste and Recycling	14 Water Pollution	15 Natural Landscape	16 Economic Performance	17 Employment Levels	18 Deprivation	19 Skills and Education	20 Transport	Score
HOU1	Mixed & balanced communities	O	O	O	O	O	O	+	++	+	O	O	O	O	O	O	O	O	++	O	O	6
HOU2	Affordable housing	O	O	O	O	O	O	+	++	O	O	O	O	O	O	O	O	O	++	O	O	5
HOU3	Rural exception sites & community-led development	O	O	O	O	O	O	+	++	O	O	O	O	O	O	+	O	O	+	O	O	5
HOU4	Sub-division of dwellings and Houses of Multiple Occupation	O	O	O	O	O	O	+	++	O	O	O	O	O	O	O	O	O	+	O	O	4
HOU5	Residential internal space standards	O	O	O	O	O	O	++	++	O	O	O	O	O	O	O	O	O	+	O	O	5
HOU6	Access standards	O	O	O	O	O	O	++	++	O	O	O	O	O	O	O	O	O	+	O	O	5
HOU7	Specialist housing for older people	O	O	O	O	O	O	++	++	+	+	O	O	O	O	O	O	O	+	O	O	7
HOU8	Residential care and nursing homes	O	O	O	O	O	O	++	++	+	+	O	O	O	O	O	O	O	+	O	O	7
HOU9	Gypsies, travellers & travelling showpeople	O	O	O	O	O	O	+	++	O	O	O	O	O	O	O	O	O	+	O	O	4
HOU10	Self-build & custom housebuilding	O	O	O	O	O	O	+	++	O	O	O	O	O	O	O	O	O	+	O	O	4
HOU11	New dwellings in the countryside	O	O	O	O	O	O	+	++	O	O	O	O	O	O	+	O	O	+	O	O	5
HOU12	Dwellings for rural workers	O	O	O	O	O	O	+	++	O	O	O	O	O	O	O	O	O	+	+	O	5
HOU13	External residential amenity areas	O	O	O	O	O	O	+	++	O	O	O	O	O	O	O	O	O	+	O	O	4
HOU14	Extensions to residential gardens in the countryside	O	O	O	O	O	O	+	++	O	O	O	O	O	O	O	O	O	O	O	O	3
HOU15	Residential extensions, alterations & outbuildings	O	O	O	O	O	O	+	++	O	O	O	O	O	O	O	O	O	O	O	O	3
HOU16	Annexes	O	O	O	O	O	O	+	++	O	O	O	O	O	O	O	O	O	O	O	O	3
HOU17	Boundary treatments & means of enclosure	O	O	O	O	O	O	O	O	O	O	+	O	O	O	+	O	O	O	O	O	2
HOU18	Accesses & drives	O	O	O	O	O	O	O	+	O	+	O	O	O	O	O	O	O	O	O	+	3

Housing policies	Score	Does this have a significant effect on the SA objective(s), whether positive or negative? State Y/N	Is the likely Impact? Negative (-1)	Is the likely Impact? Neutral (0)	Is the likely Impact? Positive (1)	Is this a temporary or permanent Impact? State T or P	Is this a short term or long term impact? State ST or LT	Are there synergies between other policies (or options) which might amplify the effect? State Y or N	Commentary/Notes Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score
		Yes	-	-	Yes	P	LT	Y	Given the amount of new housing development planned over the plan period, it is considered that there will be significant effects over the long-term, with likely cumulative effects across the SA objectives given the scope of policy areas covered within the housing chapter.

Appraisal summary

The assessment of this chapter of the Local Plan is not necessarily focussed on the new housing development in terms of the overall quantum and distribution, as this is covered by the appraisal of the development strategy. Here, the focus is on housing type and tenure. Cumulative effects of the development strategy and these thematic topic policies are set out in Chapter 7 dealing with cumulative effects.

Overall, the Chapter 3 (Delivering New Homes) policies score positively for SA objectives on housing, health and wellbeing, and deprivation with neutral effects scored on other SA objectives. This is because the policies generally provide for improved access to good quality and fit for purpose housing that meets the different needs of the local community. There are positive scores for rural exception sites policy HOU3 and New dwellings in countryside HOU11. Whilst acknowledging that new development in the countryside may compromise or adversely impact on landscape character, the scoring reflects the overall intention to restrict development and safeguard countryside.

A Thriving Local Economy

5.30. This section discusses the preparation and appraisal of the strategic and development management policies in the Regulation 19 Rother Local Plan, within the “A Thriving Local Economy” chapter.

5.31. Specifically, it covers the following policies:

ECO1	Supporting a thriving local economy
ECO2	New employment development
ECO3	Safeguarding employment land & premises
ECO4	Retention of sites of economic or community value
ECO5	Temporary uses
ECO6	Supporting town & village vitality
ECO7	Tourism activities, facilities & accommodation
ECO8	Holiday sites & accommodation
ECO9	Agricultural development & forestry
ECO10	Agricultural diversification
ECO11	Equestrian development
ECO12	Local employment & skills

Reasonable alternatives considered at Regulation 18 (2024)

5.32. The reasonable alternatives for planning policies considered at the Regulation 18 stage were first set out in the Interim SA Report (2024). Further information on the background and Council’s reasons for the selection of these alternatives was included in the Economy Background Paper (April 2024).

5.33. The reasonable alternatives were organised according to 13 ‘policy areas’, which are set out below. For each policy area, the preferred approach taken forward in the

draft Rother Local Plan (2024) is indicated by the **black highlighted text**.

5.34. **Appendix 4** includes a summary of the Sustainability Appraisal of these options. The summary duplicates information included in the Interim SA Report (2024). It has been included here for completeness and to meet the statutory requirements for SA reporting. The Interim SA Report (2024) should be referred to for further detailed information.

Policy Area 1 - Setting development targets for employment development

- **1A** - Establish employment development need figures 2020-2040 as identified through the HEDNA for the whole district.
- 1B - Set out targets as above, but the target figure broken down for each sub-area.
- 1C - Do not set a target for employment development.

Policy Area 2 – Meeting employment need development targets through allocations²⁹

- 2A - Allocate towards the 74,189 sqm, including existing allocations. Set specific uses for allocations.
- **2B** - Allocate towards the 74,189 sqm, including existing allocations. Set flexible allocations where possible, where a range of employment options may be permitted, with possible mixed use, including residential where there is potential.

Policy Area 3 – Meeting employment need through supportive policy

- **3A** - Carry forward existing policy approach established in the Core Strategy.
- 3B - Have no specific policy but rely on the Development Boundaries as set out in the Development Strategy.

²⁹ The Policy Area options were presented in the Economy Background Paper but were not assessed in the Interim SA (2024) given the stage of the plan process.

Policy Area 4 – Protecting existing sites and premises of economic value

- **4A** - Take forward DaSA Policy DEC3 to protect existing employment use except where it can be demonstrated that there is no reasonable prospect of its continued use for employment purposes.
- **4B** - A reduced marketing period (less than 18 months) for demonstrating that there is no reasonable prospect of its continued use.

Policy Area 5 – Retail and leisure development need

- **5A** - No option to identify targets for retail and leisure uses. However, the support for new retail and leisure development will be supported in principle through town centre and primary shopping area designations. Add wording: Where there are no suitable sites within town centres, consideration will first be given to edge of centre sites, after which out of centre sites may be considered.
- **5B** - No additional wording as part of town centre policy.

Policy Area 6 – Town centre hierarchy and designated areas

- **6A** - Town Centres are designated according to: Bexhill Town Centre, Rye Town Centre and Battle Town Centre. District Centres are designated according to Sidley District Centre and Little Common District Centre.
- **6B** - Primary Shopping Areas are designated according to: Bexhill Town Centre Primary Shopping Area, Rye Town Centre Primary Shopping Area, Battle Town Centre Primary Shopping Area.
- **6C** - Use of Article 4 Directions to restrict Permitted Development Right Class MA in Primary Shopping Areas.

Policy Area 7 – Retail and leisure impact assessments

- **7A** - The threshold for the implementation of Retail and Leisure Impact Assessments is to be reduced from the current 500 sqm to 280 sqm.
- **7B** - Rely on the default threshold of 2,500sqm, as set out in the NPPF.

Policy Area 8 – Tourism activities, facilities and accommodation for holiday purposes

- **8A** - Bring forward Core Strategy Policy EC6, in offering general support for proposals relating to tourism facilities, subject to criteria.
- **8A** - Combining Criterion (iv) of Core Strategy Policy EC6 and Criterion (i) of DaSA Policy DEC3, to resist the loss of land and premises currently or last in tourism use, subject to demonstrating that there is no reasonable prospect of its continued use.
- **8C** - Do not provide policy protection against the loss of tourism uses as above.
- **8d** - Bringing forward provision of Core Strategy Policy EC6 criterion (vi) to require appropriate controls are in place that restrict occupancy.

Policy Area 9 – Holiday sites

- **9A** - Bring forward DaSA Policy EC2 Holiday Sites, subject to identified amendments
- **9B** - Have no specific policy on holiday sites and instead rely on the taking forward of Core Strategy Policy EC6 into the new Local Plan.

Policy Area 10 – Local employment and skills plans

- **10A** - Policy to require LESP's via 106s from suitable developments.
- **10B** - Do not have a policy and instead rely on the fact that Rother has been able to effectively secure LESP's via S106 from suitable developments.
- **10C** - Setting the threshold for requiring LESP's as: 10 or more dwellings for residential development, 1,000sqm or more for commercial floorspace
- **10D** - Setting the threshold for requiring LESP's as smaller than: 10 or more dwellings for residential development, 1,000sqm or more for commercial floorspace
- **10E** - Setting the threshold for requiring LESP's as: 20 or more dwellings for residential development, 2,000sqm or more for commercial floorspace

- **10F** - Requiring contributions of £200 per dwelling, £1 for every sqm of commercial floorspace

Policy Area 11 – Agriculture and forestry

- **11A** - New policy, to enable the development of suitable agricultural buildings and tracks that are reasonably necessary to support agriculture and forestry.
- 11B - Have no policy and depend on permitted development rights.

Policy Area 12 – Agricultural diversification

- **12A** - Dedicated policy to support agricultural diversification subject to set criteria.
- 12B – Have no policy and generally supportive policy.

Policy Area 13 – Equestrian development

- **13A** - Take forward existing DaSA policy DCO2, which sets out a number of detailed criteria regarding equestrian development in Rother.
- 13B - Have no specific policy on equestrian developments.

Reasonable alternatives considered at Regulation 18 (2026)

- 5.35. The following sub-section discusses further considerations for the reasonable alternatives for the economic policies at the Regulation 18 stage, as part of the preparation of the Draft Rother Local Plan – Development Strategy and Site Allocations (2026).
- 5.36. It is important to note that the Draft Rother Local Plan (2026) did not cover the full complement of thematic policy topic areas in the Draft Rother Local Plan (2024) document, as the former focussed principally on the development strategy for the district, area-based policies and site allocations. Therefore, the main intention of this sub-section is to signpost where there were interactions between the first and second draft Local Plans, and indeed, any implications for the reasonable alternatives.

Policy Area 1 - Setting development targets for employment development

5.37. The preferred approach in the Draft Rother Local Plan (2024) was to establish employment development need figures 2020-2040 as identified through the HEDNA for the whole district. The approach was also carried forward to the Draft Rother Local Plan (2026). The 2026 document also disaggregated the district-wide figures into indicative figures for the five geographic sub-areas of the plan – which were set out in the ‘Vision’ for each of the respective areas. These sub-area figures were derived from updated evidence of development sites, principally the Housing and Economic Land Availability Assessment (2026).

5.38. The sub-area figures helped to inform considerations for the development strategy, discussed previously in this SA Report. It should be emphasised however that the sub-area figures were not expressed as targets and therefore did not represent a change to the preferred approach, at that time.

Policy Area 2 – Meeting employment need development targets through allocations

5.39. The preferred approach for the Draft Local Plan (2024) was to meet identified employment needs through site allocations, but with flexibility for different types of employment uses rather than prescribing specific ones. At that time, it was acknowledged that further work on this approach would be pending outcomes of HELAA, as well as site specific considerations for appropriate uses on site allocation policies.

5.40. This approach was taken forward in the Draft Rother Local Plan (2026), to provide flexibility for a range of employment uses to come forward, where sites allocations supported employment/commercial uses in principle. This approach was considered to be important given the need to ensure sufficient supply of land to meet identified

needs across the Functional Economic Market Area, which included Hastings.

- 5.41. The Plan acknowledged that further work on this policy area would be required, to take into account changes to the NPPF (2024), which placed greater emphasis on planning positively for new and emerging economic sectors and activities, as well as the latest information on employment development and future needs, which would be covered in an update to the HEDNA (2024).

Policy Area 5 – Retail and leisure development need

- 5.42. The preferred approach for this policy area was informed by the outcomes of the HEDNA (2024), which indicated that there was no additional identified need for retail floorspace at the district level, and that need for leisure uses (including associated main town centre uses) was difficult to quantify over the long term given the sector was dynamic and rapidly evolving. Therefore, with no additional need, the preferred option was to not set specific targets within the plan and to take a positive approach to supporting retail and leisure uses consistent with national planning policy.
- 5.43. The Draft Rother Local Plan (2026) carried forward this approach and did not set targets given the HEDNA evidence. However, it did include a narrative around this policy area, to set out the context and justify the approach for not including targets. It also acknowledged that the HEDNA needed to be kept under review as work on the plan progressed.
- 5.44. Furthermore, the Plan included provision for main town centre uses on some proposed site allocations, in support of a flexible approach to enabling this type of development and to support the development strategy, particularly mixed-use developments where this would support sustainable communities.

Reasonable alternatives: additional considerations for the Regulation 19 Local Plan

- 5.45. The following sub-section discusses further considerations for the reasonable alternatives for the economy policies at the Regulation 18 stage, following the consultation on the Draft Rother Local Plan (2026), and as part of the preparation of the Rother Local Plan (Regulation 19 version).

- 5.46. The focus here is whether consultation feedback, new evidence, or changes to the policy context had any implications for the preparation of the policies in the 'A Thriving Local Economy' chapter, particularly the consideration of reasonable alternatives.

Policy Area 1 - Setting development targets for employment development

- 5.47. An update to the HEDNA (2026) set out new revised identified need figures for employment uses, including projected need arising over the revised plan period, which have been reflected in the Local Plan (Regulation 19 version).
- 5.48. A key outcome of the HEDNA update was an increase on the job growth forecast for Rother, which had implications for future employment needs. The study forecast 5,155 jobs across all main employment sectors over the plan period in the district. This job growth translated into a future employment land requirement of 26.2 hectares. When planning commitments were considered, the supply and demand balance position shifted slightly and provided for further residual needs, thus reducing and effectively negating the surplus situation assessed previously, in terms of land take by hectares.³⁰
- 5.49. Furthermore, the HEDNA identified a mismatch between Rother's employment land supply and need, citing an oversupply of office land in the district and undersupply of general industrial and warehousing land. In addition, stakeholder engagement carried

³⁰ The HEDNA Update (2026) provided for a surplus in terms of employment floorspace (rather than hectares of

land), owing to differences in the which requirements are calculated.

out as part of the HEDNA also supported the technical analysis, with business and industry stakeholders indicating local needs for general industrial land and floorspace.

5.50. As a result of the HENDA Update findings, there were several implications for the Local Plan:

- A larger employment land requirement to make provision for;
- Further evidence to support the protection of existing capacity; and
- The need to seek to rebalance the employment land stock to better meet needs for industrial and warehousing uses.

5.51. This did not necessarily result in the need for additional policy approaches in principle; however, it did suggest the need for a more permissive approach to the change of use from office to industrial and warehousing in order to meet identified needs, and greater flexibility in site allocations to meet the full range of employment needs.

Policy Area 2 – Meeting employment need development targets through allocations

5.52. As noted above, an update to the HEDNA (2026) revised employment need figures. These were considered during the development of the site allocations to ensure these needs could be met in full, in terms of the overall quantum of need. The preferred approach was carried forward to provide flexibility to meet identified needs by sector, where possible.

Policy Area 5 – Retail and leisure development need

5.53. An update to the Retail and Town Centres Study (2026) continued to indicate no change in the position on the overall quantum of need for retail and leisure uses from the 2023 study. Therefore, there were no substantive changes to the options and the preferred strategic approach.

5.54. It was considered important to provide a flexible approach for new main town centre uses to come forward outside of town and local centres, consistent with the sequential and exception tests set out in national planning policy. This would help to support villages and rural areas with provision of shops and services, which can help to secure their long-term viability.

Policy Area 8 – Tourism activities, facilities and accommodation for holiday purposes

Policy Area 9 – Holiday sites

5.55. The Rother and Hastings Tourism and Visitor Accommodation (TVA) Study (2026) provided an updated picture of this economic sector. Overall, the study set out the significant role that tourism plays in Rother's local economy, and thus supported the preferred approaches considered previously.

5.56. Notably, the TVA study identified four strategic "tourism focus areas" within Rother district, where there are high concentrations of visitor accommodation. These are: Rye and Winchelsea: including Rye town, Rye Harbour, Winchelsea and Winchelsea Beach; Eastern Rother with a focus on Camber; Central Bexhill covering Collington, Central and Sackville wards; and Battle, with a focus on both the town and the surrounding area. The study suggested a focused approach to proposals for tourism uses in these areas, taking into account existing accommodation stock. Overall, it was not considered that this finding changed the overall scope of reasonable alternatives or preferred approaches considered; rather a need to nuance the overall policies to reflect these local circumstances.

Policy Area 10 – Local employment and skills plans

Following the Regulation 18 consultation in 2026, the proposed approach for planning contributions towards skills and training was retained. However, the specific level of contributions was viability tested as part of the Local Plan Viability Assessment, and this was used to inform the Regulation 19 policy.

Appraisal of the Local Plan (Regulation 19)

- 5.57. The Sustainability Appraisal of the “A Thriving Local Economy” chapter in the Draft Rother Local Plan (Regulation 19 version) is set out in the tables below.
- 5.58. The first table provides an assessment of each of the proposed policies against the 20 objectives in the SA Framework. The second table provides an overall assessment of the chapter policies, when taking together, looking at the expected magnitude of any likely effects, duration of impacts and synergies with other policies in the Local Plan, considering also cumulative impacts.

Suggested Mitigation Measures

- 5.59. The following mitigation measures have been suggested to avoid and/or mitigate expected negative effects of implementing the policies and improving their expected outcomes.
- Include an overarching policy to make clear the economic development strategy for Rother, to provide a strategic approach for supporting economic policies.
 - Provide flexibility in site allocation policies to enable general industrial and warehousing (storage & distribution) land and floorspace to come forward, where appropriate, to help meet identified needs by main sector.
 - Include criteria-based policy to ensure that the amenity of industrial uses and users is protected, to ensure the long-term viability of employment and commercial land/space.
 - Provide a clarity about the appropriateness of out-of-centre development, where this will support villages and other rural areas.

Local Plan policy	Title	1 Air pollution	2 Biodiversity	3 Climate Change	4 Water Consumption	5 Flooding	6 Coastal Erosion	7 Health and Well-being	8 Housing	9 Accessibility to services	10 Safe Environments	11 Historic Environment	12 Pollution	13 Waste and Recycling	14 Water Pollution	15 Natural Landscape	16 Economic Performance	17 Employment Levels	18 Deprivation	19 Skills and Education	20 Transport	Score
ECO1	Supporting a thriving local economy	O	O	+	O	O	O	+	O	++	O	O	O	O	O	O	++	++	+	++	+	12
ECO2	New employment development	-	O	O	O	O	O	O	O	+	O	O	-	O	O	O	++	++	+	+	+	6
ECO3	Safeguarding employment land & premises	O	O	O	O	O	O	O	O	+	O	O	O	O	O	O	++	++	+	+	O	7
ECO4	Retention of sites of economic or community value	O	O	O	O	O	O	+	O	+	O	O	O	O	O	O	++	++	+	+	+	9
ECO5	Temporary uses	O	O	O	O	O	O	O	O	+	O	O	O	O	O	O	+	+	O	+	O	4
ECO6	Supporting town & village vitality	O	O	O	O	O	O	+	O	++	O	O	O	O	O	O	++	++	+	+	+	10
ECO7	Tourism activities, facilities & accommodation	O	O	O	O	O	O	O	O	O	O	O	O	O	O	-	++	++	+	+	O	4
ECO8	Holiday sites & accommodation	O	O	O	O	O	O	O	O	O	O	O	O	O	O	-	++	++	+	+	O	5
ECO9	Agricultural development & forestry	O	O	O	-	O	O	O	O	O	O	O	O	O	O	-	++	++	+	+	O	4
ECO10	Agricultural diversification	O	O	O	-	O	O	O	O	O	O	O	O	O	O	-	++	++	+	+	O	4
ECO11	Equestrian development	O	O	O	O	O	O	O	O	O	O	O	O	O	O	-	++	++	+	+	O	5
ECO12	Local employment & skills	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	+	++	+	++	+	7

Chapter 4 – A Thriving Local Economy	Score	Does this have a <u>significant</u> effect on the SA objective(s), whether positive or negative? State Y/N	Is the likely Impact? Negative (-1)	Is the likely Impact? Neutral (0)	Is the likely Impact? Positive (1)	Is this a temporary or permanent Impact? State T or P	Is this a short term or long term impact? State ST or LT	Are there synergies between other policies (or options) which might amplify the effect? State Y or N	Commentary/Notes Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score
		Yes	-	-	Yes	P	LT	Y	Given the amount of new employment and commercial development planned over the plan period, it is considered that there will be significant effects over the long-term, with likely cumulative effects across the SA objectives given the scope of policy areas covered within the economy chapter.

Appraisal Summary

The assessment of this chapter of the Local Plan is not necessarily focussed on the new employment and commercial development in terms of the overall quantum and distribution, as this is covered by the appraisal of the development strategy. Here, the focus is on the different types of provision and development requirements for these. Cumulative effects of the development strategy and these thematic topic policies are set out in Chapter 7 dealing with cumulative effects.

Overall, the Chapter 4 (A Thriving Local Economy) policies score positively for SA objectives on economic performance, employment levels, skills and education, and deprivation with neutral effects scored on most other SA objectives. This is because the policies generally provide for improved provision of and access to employment and commercial development, and job opportunities. There are negative scores for some policies (mainly tourism and agricultural, equestrian and other land-based economic activities) on SA objectives for landscape. Whilst these activities are likely to be complementary to the rural and landscape character of the countryside, the uses may have an impact on this depending on the nature and scale of development. Further, for policies ECO9 and ECO10, agricultural and other land-based uses may lead to additional demands on water use given their nature and therefore score negatively on objectives for water efficiency. There are also negative scores for objectives on air pollution for Policy ECO2, as new employment industrial and commercial uses are likely to give rise to pollution and otherwise have harmful impacts on local amenity if not appropriately managed and mitigated.

Green to the Core

5.60. This section discusses the preparation and appraisal of the strategic and development management policies in the Regulation 19 Rother Local Plan, within the “Green to the Core” chapter.

5.61. Specifically, it covers the following policies:

GTC1	Net Zero Development
GTC2	Net Zero Retrofitting
GTC3	Construction Materials & Waste
GTC4	Water Efficiency
GTC5	Heat Networks
GTC6	Renewable & Low-carbon Energy

Reasonable alternatives considered at Regulation 18 (2024)

5.62. The reasonable alternatives for planning policies considered at the Regulation 18 stage were first set out in the Interim SA Report (2024). Further information on the background and Council’s reasons for the selection of these alternatives was included in the Climate Change and Live Well Locally Background Paper (April 2024).³¹

5.63. The reasonable alternatives were organised according to 9 ‘policy areas’, which are set out below. For each policy area, the preferred approach taken forward in the draft Rother Local Plan (2024) is indicated by the **black highlighted text**.

5.64. **Appendix 4** includes a summary of the Sustainability Appraisal of these options. The summary duplicates information included in the Interim SA Report (2024). It has been included here for completeness and to meet the statutory requirements for SA reporting. The Interim SA Report (2024) should be referred to for further detailed information.

Policy Area 1 – Net Zero Building Standards

- **1A** - A standalone policy with sections on operational energy, embodied carbon and whole life carbon to support the raise in construction standards to net zero carbon emissions.
- 1B – No local plan policy (i.e., apply existing standards in Building Regulations).

Policy Area 2 – Net Zero Retrofit Standards

- **2A** - A standalone policy with recommendations for all retrofit schemes to meet certain standards.
- 2B – Carry forward Core Strategy policy SRM1.

Policy Area 3 – Construction Materials and Waste

- **3A** - A standalone policy with sections on operational energy, embodied carbon and whole life carbon to support the raise in construction standards to net zero carbon emissions.
- 3B – No local plan policy (i.e., rely on relevant policies in East Sussex Minerals and Waste Plan and national planning policy).

Policy Area 4 – Water Efficiency

This policy area was moved to be included in the ‘Environmental Management’ thematic policy area chapter in the Draft Local Plan (2024) and associated SA Report.³²

Policy Area 5 – Heat Networks

- **5A** - A standalone policy in support of heat networks.
- 5B - No local plan policy (i.e., rely on relevant national planning policy).

Policy Area 6: Renewable and Low Carbon Energy

- **6A** - A standalone policy to support renewable and low carbon energy generation.
- 6B - No local plan policy (i.e., rely on relevant national planning policy).

Policy Area 7: Local Nature Recovery Areas

options, as per the supporting text of the SA Report. They have been included here for legibility.

³² It was subsequently moved to the ‘Natural and Historic Environment’ chapter of the Regulation 19 version of the Plan.

³¹ Policy options 1B, 2B, 3B, 5B, 6B, 7B, 9B were not specified in the Interim SA Report (2024) and Background Paper but were implied as

- **7A** - A new standalone policy to support the objectives of the Local Nature Recovery Areas.
- 7B - No local plan policy (i.e., rely on relevant national planning policy).

Refer to the 'Natural and Historic Environment' Section of this SA Report for further information.

Policy Area 8: Biodiversity Net Gain Policy Option

- **8A** - A new standalone policy to support the objectives of the Local Nature Recovery Areas at 10% (matching national standard policy requirements).
- 8B - A new standalone policy to support the objectives of the Local Nature Recovery Areas at 20%.

Refer to the 'Natural and Historic Environment' Section of this SA Report for further information.

Policy Area 9: High Weald National Landscape

This policy area was moved to the 'Natural and Historic Environment' chapter of the Regulation 19 version of the Local Plan.

- **9A** - A standalone policy to support the consideration of development in the High Weald National Landscape.
- 9B - No local plan policy (i.e., rely on relevant national planning policy).

Refer to the 'Natural and Historic Environment' Section of this SA Report for further information.

Reasonable alternatives considered at Regulation 18 (2026)

- 5.65. The following sub-section discusses further considerations for the reasonable alternatives for the 'Green to the Core' policies at the Regulation 18 stage, as part of the preparation of the Draft Rother Local Plan – Development Strategy and Site Allocations (2026).
- 5.66. It is important to note that the Draft Rother Local Plan (2026) did not cover the full complement of thematic policy topic areas in the Draft Rother Local Plan (2024) document, as the former focussed principally on the development strategy for the district, area-

based policies and site allocations. Therefore, the main intention of this sub-section is to signpost where there were interactions between the first and second draft Local Plans, and indeed, any implications for the reasonable alternatives.

Reasonable alternatives: additional considerations for the Regulation 19 Local Plan

- 5.67. The following sub-section discusses further considerations for the reasonable alternatives for the Green to the Core policies at the Regulation 18 stage, following the consultation on the Draft Rother Local Plan (2026), and as part of the preparation of the Rother Local Plan (Regulation 19 version).
- 5.68. The focus here is whether consultation feedback, new evidence, or changes to the policy context had any implications for the preparation of the policies in the 'Green to the Core' chapter, particularly the consideration of reasonable alternatives.

Policy Area 1 – Net Zero Building Standards, Policy Area 2 – Net Zero Retrofit Standards and Policy Area 4 – Water Efficiency

- 5.69. The approaches were considered in light of the Local Plan Viability Assessment and what could viably be required through planning policy.
- 5.70. For water efficiency standards, some consultees requested a further tightening of standards in light of local issues given Rother is a water stressed area, beyond the optional standards set in Building Regulations. This was explored however, findings of the assessment indicated these higher standards were not viable, and therefore the optional higher standard in Building Regulations was progressed.
- 5.71. It was also recognised that new Future Homes and Buildings Standards, Circular 01/2026 introduce a step change in requirements for zero-carbon ready homes,

energy efficiency and carbon reduction. Given the Council's priorities and objectives for climate change resilience, it was considered appropriate to set local standards.

Appraisal of the Local Plan (Regulation 19)

- 5.72. The Sustainability Appraisal of the "Green to the Core" chapter in the Rother Local Plan (Regulation 19 version) is set out in the tables below.
- 5.73. The first table provides an assessment of each of the proposed policies against the 20 objectives in the SA Framework. The second table provides an overall assessment of the chapter policies, when taking together, looking at the expected magnitude of any likely effects, duration of impacts and synergies with other policies in the Local Plan, considering also cumulative impacts.

Suggested Mitigation Measures

- 5.74. The following mitigation measures have been suggested to avoid and/or mitigate expected negative effects of implementing the policies and improving their expected outcomes.
- Provide clear policy directions for when the policy requirements and standards apply to development proposals involving heritage assets, having regard to the need to conserve and enhance their significance.
 - For decentralised energy, distinguish circumstances where development must be designed to be connection ready, and where it should be required to connect to the network(s).

Local Plan policy	Title	1 Air pollution	2 Biodiversity	3 Climate Change	4 Water Consumption	5 Flooding	6 Coastal Erosion	7 Health and Well-being	8 Housing	9 Accessibility to services	10 Safe Environments	11 Historic Environment	12 Pollution	13 Waste and Recycling	14 Water Pollution	15 Natural Landscape	16 Economic Performance	17 Employment Levels	18 Deprivation	19 Skills and Education	20 Transport	Score
GTC1	Net zero development	+	O	++	O	O	O	+	O	O	O	O	O	O	O	O	+	O	O	O	O	5
GTC2	Net zero retrofitting	+	O	++	O	O	O	+	O	O	O	-	O	O	O	O	+	O	O	O	O	4
GTC3	Construction materials & waste	+	O	+	O	O	O	O	O	O	O	O	+	O	O	O	+	O	O	O	+	5
GTC4	Water efficiency	O	O	O	++	+	O	O	O	O	O	O	O	O	+	O	O	O	O	O	O	4
GTC5	Heat networks	+	O	++	O	O	O	+	O	O	O	O	O	O	O	O	O	O	O	O	O	4
GTC6	Renewable & low carbon energy	+	O	++	O	O	O	+	O	O	O	O	O	O	O	-	O	O	O	O	O	2

Chapter 5 – Green to the Core	Score	Does this have a <u>significant</u> effect on the SA objective(s), whether positive or negative? State Y/N	Is the likely Impact? Negative (-1)	Is the likely Impact? Neutral (0)	Is the likely Impact? Positive (1)	Is this a temporary or permanent Impact? State T or P	Is this a short term or long term impact? State ST or LT	Are there synergies between other policies (or options) which might amplify the effect? State Y or N	Commentary/Notes Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score
		Y			Y	P	LT	Y	Given the scale of new development proposed through the Development Strategy, the policies are likely to result in a significant positive and long-term effect on SA objectives for climate change and water efficiency.

Appraisal Summary

Overall, the chapter policies score positively for SA objectives on climate change and water efficiency together with neutral effects predicted for most other objectives. There are likely minor positive scores for health and wellbeing, as energy efficient homes and commercial may result in lower energy costs for households and businesses. Some minor negative effects are predicted for historic environment, as there may be instances where sustainable retrofitting has an adverse impact on the significance of the heritage asset in question. In addition, some renewable energy installations (such as wind turbines and solar farms) may have an adverse impact on the character of landscapes, such as the country side and coastal areas and therefore a minor negative effect is scored.

Live Well Locally

5.75. This section discusses the preparation and appraisal of the strategic and development management policies in the Regulation 19 Rother Local Plan, within the “Live Well Locally” chapter.

5.76. Specifically, it covers the following policies:

DEV1	General Development Considerations
DEV2	Comprehensive Development & Masterplanning
LWL1	Efficient Use of Land & Appropriate Densities
LWL2	Facilities & Services for Residential Development
LWL3	Active Travel, Public Transport Connections & Services Outside the Site
LWL4	Active Travel & Public Transport Within Sites
LWL5	Well-designed & Distinctive Places
LWL6	Streets & Public Realm for All
LWL7	Multimodal Parking, Servicing & Deliveries
HWB2	Health Impact Assessments
HWB3	Managing Impacts on Community Wellbeing
HWB4	Healthcare & Other Community Facilities & Services

It is noted that the Regulation 19 version of the Rother Local Plan has been reformatted from the Regulation 18 stage(s). This has resulted in the removal and/or rearrangement of some chapter headings and policies from the Regulation 18 draft Local Plans.

This sub-section of the SA Report therefore covers the Live Well Locally policy areas from the Regulation 18 (2024) plan, as well as other policy areas that have now been included in this Live Well Locally chapter of the Regulation 19 plan.

Reasonable alternatives considered at Regulation 18 (2024)

5.77. The reasonable alternatives for planning policies considered at the Regulation 18 stage were first set out in the Interim SA

Report (2024). Further information on the background and Council’s reasons for the selection of these alternatives was included in the Climate Change and Live Well Locally and Health and Wellbeing Background Papers (April 2024).

5.78. For each policy area, the preferred approach taken forward in the draft Rother Local Plan (2024) is indicated by the **black highlighted text**.

5.79. **Appendix 4** includes a summary of the Sustainability Appraisal of these options. The summary duplicates information included in the Interim SA Report (2024). It has been included here for completeness and to meet the statutory requirements for SA reporting. The Interim SA Report (2024) should be referred to for further detailed information.

Live Well Locally (2024) policy areas

Policy Area 1: Compact Development

- **1A** - New standalone policy in relation to compact development (design and density).
- 1B - No new policy, and reliance on NPPF policies

Policy Area 2: Facilities and Services

- **2A** - New standalone policy in relation to facilities and services.
- 2B - No new policy, and reliance on NPPF policies.

Policy Area 3: Walking Wheeling, Cycling and Public Transport

- **3A** - Requirements to be delivered outside of the site.
- **3B** - Requirements to be delivered inside of the site.

Policy Area 4: Distinctive Places

- **4A** - New standalone policy in relation to distinctive places.
- 4B - No new policy, and reliance on national planning policies.

Policy Area 5: Built Form

- **5A** - New standalone policy in relation to built form.
- 5B - No new policy, and reliance on national planning policies.

Policy Area 6: Streets for All

- **6A** - New standalone policy in relation to streets for all.
- 6B - No new policy, and reliance on national planning policies.

Policy Area 7: Multimodal Parking

- **7A** - New standalone policy in relation to multimodal parking.
- 7B - No new policy, and reliance on national planning policies.

Development Principles policy areas (brought into the Live Well Locally section)

Policy Area 1: General Development Principles

- **1A** - New policy setting out general development principles
- 1B - No policy, and reliance on national planning policies.

Policy Area 2: Comprehensive Development and Masterplanning

- **2A** - New policy setting requirements for comprehensive development and masterplanning.
- 2B - No policy, and reliance on national planning policies.

Health and Well Being policy areas (brought into the Live Well Locally section)

Policy Area 2: Health Impact Assessments (HIA)

- **2A** - HIAs on all non-domestic applications.
- 2B - HIAs on all major applications.
- **2C** - HIAs on all largescale applications.
- **2D** - HIAs within deprived areas.
- 2E - No requirement for a HIA.

Policy Area 3: Reducing Harmful Impacts on Health

- **3A** - Restricting hot food takeaways in Sidley District Centre (carry forward existing policy).
- **3B** - Restricting hot food takeaways around schools and parks
- **3C** - Reducing harmful impacts on health through a limit on various uses

Policy Area 4: Community Facilities

- **4A** - Community facilities and services.

Policy Area 6: Public Rights of Way

- **6A** - Public Rights of Way.

Reasonable alternatives considered at Regulation 18 (2026)

5.80. The following sub-section discusses further considerations for the reasonable alternatives for the 'Live Well Locally' policies at the Regulation 18 stage, as part of the preparation of the Draft Rother Local Plan – Development Strategy and Site Allocations (2026).

5.81. It is important to note that the Draft Rother Local Plan (2026) did not cover the full complement of thematic policy topic areas in the Draft Rother Local Plan (2024) document, as the former focussed principally on the development strategy for the district, area-based policies and site allocations. Therefore, the main intention of this sub-section is to signpost where there were interactions between the first and second draft Local Plans, and indeed, any implications for the reasonable alternatives.

Live Well Locally (2024) policy areas

Policy Area 1: Compact Development

5.82. This policy area includes considerations for the density of new residential development. Policy LWL1 of the Draft Rother Local Plan (2024) set out indicative density standards for different 'area types' within the district, as part of the principle of compact development advocated by the Plan. The reasonable alternatives for this approach were set out in Policy Area 1 of the Live Well Locally

Background Paper (2024) and Interim SA Report (2024).

- 5.83. Residential density was then further explored through the preparation of the Draft Rother Local Plan (2026) in Part 3, Chapter 5 of the document, under the sub-section 'Housing and Economic Land Availability Assessment and Achieving Appropriate Densities'. This reconsideration of densities was driven mainly in response to the need for the Local Plan to optimise the capacity of sites, particularly in seeking to meet the Local Housing Need figure for the district, in line with the NPPF.
- 5.84. The consideration of densities for the Draft Rother Local Plan (2026) was informed by new technical evidence, namely the Rother Density Study Update (2026). In light of this, the Council explored several density options for the various 'area types' in Rother to inform the production of the Local Plan. The density options were described as 'business as usual', 'higher density' and 'higher density plus', with indicative density ranges for each for different area types (set out by dwellings per hectare) The reasonable alternatives and preferred approach is discussed in further detail in Chapter 4 of this SA Report. They are signposted here as the density standards are given effect through the Live Well Locally policies, and site allocations, included in the Regulation 19 version of the Plan.

Reasonable alternatives: additional considerations for the Regulation 19 Local Plan

- 5.85. The following sub-section discusses further considerations for the reasonable alternatives for the Green to the Core policies at the Regulation 18 stage, following the consultation on the Draft Rother Local Plan (2026), and as part of the preparation of the Rother Local Plan (Regulation 19 version).
- 5.86. The focus here is whether consultation feedback, new evidence, or changes to the policy context had any implications for the

preparation of the policies in the 'Live Well Locally' chapter, particularly the consideration of reasonable alternatives.

Policy Area 1: Compact Development

- 5.87. This policy area considers appropriate densities across the district. The strategic approach and reasonable alternatives on this are discussed as part of the Development Strategy, in Chapter 4 of this SA report (including the scenario testing for residential densities). Policy LWL1 of the Regulation 19 Local Plan gives effect to the preferred approach.

Policy Area 3: Walking Wheeling, Cycling and Public Transport and Policy Area 6: Streets for All

- 5.88. Regulation 18 Consultation feedback from statutory bodies, including Active Travel England and Sport England, emphasised the need to integrate land-use planning and transport for different modes of travel. They highlighted relevant guidance and design tools, focussed on enhancing movement and accessibility. Further, new evidence, including the updated East Sussex Local Cycling and Walking Infrastructure Plan (LCWIP), set out opportunities in this respect. The Local Plan has been amended having regard to this evidence and feedback, however for SA purposes, these have not necessitated the consideration of additional reasonable alternatives.

Policy Area 4: Distinctive Places and Policy Area 5: Built Form

- 5.89. Both Regulation 18 consultations on the Local Plan generated a wide range of comments on built form, particularly with respect to local character and distinctiveness. The Regulation 19 plan has been amended having regard to these comments. This has resulted, for the most part, in the fine tuning of policies and supporting text to assist with policy implementation. However, these have not necessitated further assessment of reasonable alternatives for these policy areas, as previously set out, notwithstanding

considerations for compact development (i.e., density) as set out above.

Appraisal of the Local Plan (Regulation 19)

- 5.90. The Sustainability Appraisal of the “Live Well Locally” chapter in the Rother Local Plan (Regulation 19 version) is set out in the tables below.
- 5.91. The first table provides an assessment of each of the proposed policies against the 20 objectives in the SA Framework. The second table provides an overall assessment of the chapter policies, when taking together, looking at the expected magnitude of any likely effects, duration of impacts and synergies with other policies in the Local Plan, considering also cumulative impacts.

Suggested Mitigation Measures

- 5.92. The following mitigation measures have been suggested to avoid and/or mitigate expected negative effects of implementing the policies and improving their expected outcomes.
- Include site specific requirements in to ensure policy principles are carried forward into site allocations.
 - Set requirements for transport assessments and travel plans to be required, where appropriate.

Local Plan policy	Title	1 Air pollution	2 Biodiversity	3 Climate Change	4 Water Consumption	5 Flooding	6 Coastal Erosion	7 Health and Well-being	8 Housing	9 Accessibility to services	10 Safe Environments	11 Historic Environment	12 Pollution	13 Waste and Recycling	14 Water Pollution	15 Natural Landscape	16 Economic Performance	17 Employment Levels	18 Deprivation	19 Skills and Education	20 Transport	Score
DEV1	General Development Considerations	+	0	0	0	0	0	+	0	0	+	0	+	0	0	+	0	0	+	0	0	6
DEV2	Comprehensive Development & Masterplanning	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
LWL1	Efficient Use of Land & Appropriate Densities	0	0	0	0	0	0	++	+	++	0	0	0	0	0	+	+	0	0	0	+	8
LWL2	Facilities & Services for Residential Development	0	0	0	0	0	0	++	0	++	0	0	0	0	0	0	0	0	++	0	+	7
LWL3	Active Travel, Public Transport Connections & Services Outside the Site	+	0	+	0	0	0	++	0	++	0	0	0	0	0	0	0	0	0	0	++	8
LWL4	Active Travel & Public Transport Within Sites	+	0	+	0	0	0	++	0	++	0	0	0	0	0	0	0	0	0	0	++	8
LWL5	Well-designed & Distinctive Places	+	+	+	0	0	0	+	+	++	+	+	0	+	0	+	0	0	+	0	+	13
LWL6	Streets & Public Realm for All	+	+	+	0	+	0	++	0	++	++	0	0	0	0	0	+	0	+	0	++	14
LWL7	Multimodal Parking, Servicing & Deliveries	0	0	0	0	0	0	+	0	+	+	0	0	0	0	0	+	0	+	0	++	7
HWB2	Health Impact Assessments	0	0	0	0	0	0	++	0	0	0	0	0	0	0	0	0	0	++	0	0	4
HWB3	Managing Impacts on Community Wellbeing	0	0	0	0	0	0	++	0	0	0	0	0	0	0	0	0	0	++	0	0	4
HWB4	Healthcare & Other Community Facilities & Services	0	0	0	0	0	0	++	0	++	0	0	0	0	0	0	0	0	++	0	+	7

Chapter 6 – Live Well Locally policies	Score	Does this have a significant effect on the SA objective(s), whether positive or negative? State Y/N	Is the likely Impact? Negative (-1)	Is the likely Impact? Neutral (0)	Is the likely Impact? Positive (1)	Is this a temporary or permanent Impact? State T or P	Is this a short term or long term impact? State ST or LT	Are there synergies between other policies (or options) which might amplify the effect? State Y or N	Commentary/Notes Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score
		Y			Y	P	LT	Y	T the policies will support the optimal use of land and enable active travel, with potential to reduce use of private cars, and improve access to services and facilities. Whilst the policies are supportive in this regard, there will continue to be provision

Chapter 6 – Live Well Locally policies	Score	Does this have a <u>significant</u> effect on the SA objective(s), whether positive or negative? State Y/N	Is the likely Impact? Negative (-1)	Is the likely Impact? Neutral (0)	Is the likely Impact? Positive (1)	Is this a temporary or permanent Impact? State T or P	Is this a short term or long term impact? State ST or LT	Are there synergies between other <u>policies</u> (or options) which might amplify the effect? State Y or N	Commentary/Notes Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score
									needed for cars and vehicle movements given existing transport infrastructure and the rural nature of the district.

Appraisal Summary

Overall, the chapter policies score positively across a number of SA objectives, particularly for Health and Wellbeing, Accessibility to Services and Facilities, Deprivation and Transport. This is owing to the support for active travel modes and integrated land-uses, whereby development in proximity to or enhances access to services and facilities. This is likely to have consequential impacts on reducing air pollution and addressing some of the key determinants of deprivation.

Natural and Historic Environment

5.93. This section discusses the preparation and appraisal of the strategic and development management policies in the Rother Local Plan (Regulation 19 version), within the “Natural and Historic Environment” chapter.

5.94. Notably, this chapter brings together a number of separate sections and policy areas from the Draft Local Plan (2024) under a new umbrella chapter heading, dealing with matters relating to the natural and historic environment. This was a formatting change to assist with the organisation and legibility of the Plan.

5.95. Specifically, this chapter covers the following policies:

It is noted that the Regulation 19 version of the Rother Local Plan has been reformatted from the Regulation 18 stage(s). This has resulted in the removal and/or rearrangement of some chapter headings and policies from the Regulation 18 draft Local Plans.

This sub-section of the SA Report therefore covers Environmental Management and Heritage areas from the Regulation 18 (2024) plan, as well as other policy areas that have now been included in elsewhere in the Local Plan, such as Green to the Core.

Reasonable alternatives considered at Regulation 18 (2024)

5.96. The reasonable alternatives for planning policies considered at the Regulation 18 stage were first set out in the Interim SA Report (2024). Further information on the background and Council’s reasons for the selection of these alternatives was included in the relevant Background Papers (April 2024), specifically for: Environmental Management, Heritage, Health and Wellbeing, and Climate Change and Live Well Locally.

5.97. The reasonable alternatives were organised according to a number of ‘policy areas’, which are set out below. For each policy area, the preferred approach taken forward

in the draft Rother Local Plan (2024) is indicated by the **black highlighted text**.

5.98. Appendix 4 includes a summary of the Sustainability Appraisal of these options. The summary duplicates information included in the Interim SA Report (2024). It has been included here for completeness and to meet the statutory requirements for SA reporting. The Interim SA Report (2024) should be referred to for further detailed information.

Environmental Management (2024) policy areas

Policy Area 1: Sustainable Drainage

- **1A** - A standalone policy covering a wide range of policy matters relating to Sustainable Drainage Schemes (SuDS).

Policy Area 2: Coastal, Water and Flood Risk Management

- **2A** - A standalone policy combining existing policies.

Policy Area 3: Water Efficiency

- **3A** - A standalone policy to just trigger the optional building regulations standard.
- **3B** - A standalone policy to both trigger the optional standard as well as seek efficiency measures more generally.

Policy Area 4: Land stability

- **4A** - A standalone policy for a district wide approach to land stability.

Policy Area 5: Coastal Change Management Areas

- **5A** - A Coastal Change Management Area in the Fairlight Cove area.
- **5B** - A Coastal Change Management Area that covers the entirety of Rother’s coast.
- **5C** - Relocating uses away from the Coastal Change Management Area.

Policy Area 6: Habitats and Species

- **6A** - A standalone policy looking to cover both legally and non-legally protected habitats and species.

Policy Area 7: Environmental Pollution

- **7A** - A standalone policy to cover all forms of environmental pollution with specific subpoints for more specific policies on certain forms of pollution

Green to the Core (2024) policy areas

Policy Area 4 – Water Efficiency³³

See Policy Area 3 – Water Efficiency above (under the Environmental Management sub-heading) for further information. This has been moved to the Green to the Core chapter in the Regulation 19 plan.

Policy Area 9: High Weald National Landscape

This policy area was originally included in the ‘Green to the Core’ chapter and then moved to the ‘Natural and Historic Environment’ chapter of the Regulation 19 version of the plan. The reasonable alternatives are repeated below to assist the reader.

- **9A** - A standalone policy to support the consideration of development in the High Weald National Landscape.
- 9B - No local plan policy (i.e., rely on relevant national planning policy).

Heritage (2024) policy areas

Policy Area 1: Heritage Management

- **1A** - A standalone policy dealing with heritage management.
- 2B - No policy (i.e., rely on national planning policies).

Policy Area 2: Traditional Historic Farm Buildings

- **2A** - A standalone policy dealing with traditional historic farm buildings.
- 2B - No policy (i.e., rely on national planning policies).

Policy Area 3: Shopfronts, Signage and Advertising

- **3A** - A standalone policy dealing with shopfronts, signage and advertising

- 3B - No policy (i.e., rely on national planning policies).

Landscape Character (2024) policy areas

Policy Area 1: Rural Environments and Landscape Character

- **1A** - A standalone policy consolidating the protection the districts landscape and landscape designations must be given when considering development.
- 1B - No policy (i.e., rely on national planning policies).

Policy Area 2: Trees Woodlands and Hedgerows

- **2A** - A standalone policy to introduce increased protection and valuation for the assets.
- 2B - No policy (i.e., rely on national planning policies).

Policy Area 3: Dark Skies

- **3A** - Standalone policy to introduce new protections to the dark skies in the district.
- 3B - No policy (i.e., rely on national planning policies).

Health and Wellbeing (2024) policy areas

Policy Area 5: Green and Blue Infrastructure

- **5A** - A standalone policy on green and blue Infrastructure.

Policy Area 6: Public Rights of Way

- **6A** - A standalone policy on Public Rights of Way.

Policy Area 7: Combe Valley Countryside Park

- **7A** - A standalone policy on the Combe Valley Countryside Park

Reasonable alternatives considered at Regulation 18 (2026)

5.99. The following sub-section discusses further considerations for the reasonable

³³ This policy area was originally included in the ‘Green to the Core’ chapter and was then moved to be included in the ‘Environmental Management’ thematic policy area chapter in the Draft Local Plan (2024). It was

subsequently moved to the ‘Natural and Historic Environment’ chapter of the Regulation 19 version of the Plan.

alternatives for the Natural and Historic Environment policies at the Regulation 18 stage, as part of the preparation of the Draft Rother Local Plan – Development Strategy and Site Allocations (2026).

- 5.100. It is important to note that the Draft Rother Local Plan (2026) did not cover the full complement of thematic policy topic areas in the Draft Rother Local Plan (2024) document, as the former focussed principally on the development strategy for the district, area-based policies and site allocations. Therefore, the main intention of this sub-section is to signpost where there were interactions between the first and second draft Local Plans, and indeed, any implications for the reasonable alternatives.

Policy Area 9: High Weald National Landscape³⁴

- 5.101. The Draft Local Plan (2026) introduced proposed site allocation policies. Consideration for the National Landscape was given through the site selection process, as set out in the HELAA, and further assessed through the Interim SA Report (2026). Some of the proposed site allocations were located within the National Landscape. However, the interactions with this policy area were limited, as it deals principally with criteria for development management through the planning approvals process rather than wider strategic and spatial considerations, which were addressed through the preparation of the Development Strategy for this district. Therefore, there was no change from the reasonable alternatives or preferred approach on this thematic policy topic area.

Reasonable alternatives: additional considerations for the Regulation 19 Local Plan

- 5.102. The following sub-section discusses further considerations for the reasonable alternatives for the environment and

heritage policies at the Regulation 18 stage, following the consultation on the Draft Rother Local Plan (2026), and as part of the preparation of the Rother Local Plan (Regulation 19 version).

- 5.103. The focus here is whether consultation feedback, new evidence, or changes to the policy context had any implications for the preparation of the policies in the ‘Natural and Historic Environment’ chapter, particularly the consideration of reasonable alternatives.

Policy Area 1: Sustainable Drainage and Policy Area 2: Coastal, Water and Flood Risk Management

- 5.104. New evidence base, particularly the updated Strategic Flood Risk Assessment, coupled with Regulation 18 consultation feedback from statutory and other consultees (including the Environment Agency and water companies), helped to inform the Regulation 19 plan policies covering these topic areas. These did not necessitate new reasonable alternatives, as the policy approaches are clearly established by national planning policy and guidance in terms of flood risk management.

Policy Area 5: Coastal Change Management Areas

- 5.105. There were further considerations for the proposals regarding the Coastal Change Management Area. This was particularly in response to Regulation 18 consultation feedback from the Marine Management Organisation and its recommendations that the plan help give effect to the South Inshore and Offshore Marine Plan. The Environment Agency also made representations on this policy area. Further, the updated Strategic Flood Risk Assessment recommended an area of coverage for the CCMA. Finally, the Council’s engagement with neighbouring authorities has shed light on the benefits of a coordinated approach to the drawing of the CCMA across the sub-region. In light of the above, the boundary has subsequently been

³⁴ Initially set out in the Green to the Core policy area, as discussed in the SA Report.

updated in the Regulation 19 document and Policies Map, to cover the extent of the shoreline.

Policy Area 6: Habitats and Species and Policy Area Green and Blue Infrastructure³⁵

- 5.106. Key evidence base documents pertaining to biodiversity and green blue infrastructure were prepared and/or published following the Regulation 18 consultations. They included the Local Nature Recovery Strategy for East Sussex and Brighton & Hove, as well as the Rother Green and Blue Infrastructure Study. This new evidence has helped to inform the Regulation 19 Local Plan, building on proposed policies set out previously.
- 5.107. The Green and Blue Infrastructure Study helped with the identification of natural assets that the Local Plan will seek to protect and enhance. The study provides local evidence to support national planning policies on nature conservation. The LNRS also includes local evidence to support the local biodiversity net gain regime, consistent with the Environment Act 2024 and statutory provisions for BNG. Given this overarching policy framework, there are not considered to be further, strategic reasonable alternatives on this matter.
- 5.108. Notwithstanding this, the Council has pursued BNG standards of 20%, a policy option which goes beyond the statutory minimum of 10% set out in legislation. This approach has been considered and tested through the Local Plan Viability Assessment.
- 5.109. In terms of open space, the Green and Blue Infrastructure Study has provided a baseline against which to set local standards, informed by an assessment of such provision (including for different types of open space) across the district. There is not considered to be a reasonable alternative here, and the NPPF makes clear that the Local Plan should undertake an assessment

of open space needs and include policies to address these.

Policy Area 7: Environmental Pollution

- 5.110. Detailed criteria-based policies regarding environmental pollution have largely been removed from the Local Plan to avoid duplication of national policy and legislation.

Appraisal of the Local Plan (Regulation 19)

- 5.111. The Sustainability Appraisal of the “Natural and Historic Environment” chapter in the Rother Local Plan (Regulation 19 version) is set out in the tables below.
- 5.112. The first table provides an assessment of each of the proposed policies against the 20 objectives in the SA Framework. The second table provides an overall assessment of the chapter policies, when taking together, looking at the expected magnitude of any likely effects, duration of impacts and synergies with other policies in the Local Plan, considering also cumulative impacts.

Policy Area 9: High Weald National Landscape

- 5.113. In response to Regulation 18 consultation feedback, including the High Weald AONB Landscape Unit, the Council undertook further Landscape Sensitivity testing to inform the Local Plan. This was carried out for a selection of proposed site allocation policies. Therefore, it did not affect considerations for this policy area, as far as the reasonable alternatives to the thematic policy area was concerned.

Suggested Mitigation Measures

- 5.114. The following mitigation measures have been suggested to avoid and/or mitigate expected negative effects of implementing

³⁵ Green and Blue Infrastructure was Policy Area 5 from the Health and Wellbeing Section

the policies and improving their expected outcomes.

- Undertake further landscape sensitivity testing, including at the planning application stage, particularly where development is proposed in the HWNL.
- Require that development is appropriately phased where infrastructure for water management (including wastewater and water supply) is needed to support development.
- Clarify that open space standards are minimum standards, whilst seeking that development maximises opportunities in this respect.
- Provide clarify on expectations for off-site provision of BNG and seek to prioritise the use of off-site contributions towards objectives and actions in the Local Nature Recovery Strategy.

Local Plan policy	Title	1 Air pollution	2 Biodiversity	3 Climate Change	4 Water Consumption	5 Flooding	6 Coastal Erosion	7 Health and Well-being	8 Housing	9 Accessibility to services	10 Safe Environments	11 Historic Environment	12 Pollution	13 Waste and Recycling	14 Water Pollution	15 Natural Landscape	16 Economic Performance	17 Employment Levels	18 Deprivation	19 Skills and Education	20 Transport	Score
LAN1	Landscape Character & Stewardship	O	++	O	O	O	+	+	O	O	O	+	O	O	O	++	O	O	O	O	O	6
LAN2	High Weald National Landscape	O	+	O	O	O	O	+	O	O	O	++	O	O	O	++	O	O	O	O	O	6
LAN3	Trees, Woodlands & Hedgerows	O	++	O	O	O	O	+	O	O	+	+	O	O	O	O	O	O	O	O	O	5
LAN4	Light Pollution & Dark Skies	O	+	O	O	O	O	+	O	O	O	O	+	O	O	+	O	O	O	O	O	4
ENV1	Flood Risk Management	O	O	++	O	++	+	+	O	O	++	+	O	O	O	+	O	O	O	O	O	10
ENV2	Protection of Water Quality and the Water Environment	O	++	O	O	+	+	+	O	O	+	O	O	O	++	+	O	O	O	O	O	9
ENV3	Sustainable Surface Water Drainage	O	+	O	O	++	+	+	O	O	+	O	O	O	++	O	O	O	O	O	O	8
ENV4	Foul Water Drainage	O	O	O	O	+	O	+	O	O	+	O	O	O	++	O	O	O	O	O	O	5
ENV5	Ground Conditions	O	+	O	O	O	++	+	O	O	+	O	++	O	O	O	O	O	O	O	O	7
ENV6	Rother Coastal Change Management Area	O	+	+	O	+	++	+	O	+	++	+	O	O	O	++	+	O	O	O	O	12
ENV7	Biodiversity	O	++	O	O	O	O	+	O	O	O	O	+	O	O	++	O	O	O	O	O	6
ENV8	Habitats & Species	O	++	O	O	O	O	+	O	O	O	O	+	O	O	++	O	O	O	O	O	6
ENV9	Local Nature Recovery Strategy	O	++	O	O	O	O	+	O	O	O	O	+	O	O	++	O	O	O	O	O	6
ENV10	Biodiversity Net Gain	O	++	O	O	O	O	+	O	O	O	O	+	O	O	++	O	O	O	O	O	6
ENV11	Sustainable Access & Recreation Management Strategy	O	++	O	O	O	O	+	O	+	O	O	+	O	O	+	O	O	O	O	O	6
ENV12	Bewl Water	O	++	O	O	O	O	+	O	+	O	O	+	O	O	+	+	O	O	O	O	7
ENV13	Green & Blue Infrastructure	O	++	O	O	+	+	++	O	++	+	O	O	O	+	++	+	O	+	O	O	14
ENV14	Recreational Facilities & Open Space	O	+	O	O	O	O	++	O	++	+	O	O	O	O	O	+	+	+	O	O	9
ENV15	Public Rights of Way	O	O	O	O	O	O	O	+	+	O	+	O	O	O	O	O	O	O	O	+	4

Local Plan policy	Title	1 Air pollution	2 Biodiversity	3 Climate Change	4 Water Consumption	5 Flooding	6 Coastal Erosion	7 Health and Well-being	8 Housing	9 Accessibility to services	10 Safe Environments	11 Historic Environment	12 Pollution	13 Waste and Recycling	14 Water Pollution	15 Natural Landscape	16 Economic Performance	17 Employment Levels	18 Deprivation	19 Skills and Education	20 Transport	Score
ENV16	Combe Valley Countryside Park	O	++	+	O	O	O	++	O	+	O	O	O	O	O	++	O	O	O	O	O	7
HER1	Conservation of the Historic Environment	O	O	O	O	O	O	+	+	O	O	++	O	O	O	+	O	O	O	O	O	5
HER2	Conversion & Re-use of Historic Buildings	O	O	+	O	O	O	+	O	O	O	++	O	O	O	+	O	O	O	O	O	5
HER3	Shopfronts, Signage & Advertising	O	O	O	O	O	O	O	O	O	O	+	+	O	O	O	+	O	O	O	O	2
HER4	Doors, Windows, & Roofscapes in Conservation Areas & Listed Buildings	O	O	O	O	O	O	O	+	O	O	++	O	O	O	O	O	O	O	O	O	3

Natural and Historic Environment Policies	Score	Does this have a <u>significant</u> effect on the SA objective(s), whether positive or negative? State Y/N	Is the likely Impact? Negative (-1)	Is the likely Impact? Neutral (0)	Is the likely Impact? Positive (1)	Is this a temporary or permanent Impact? State T or P	Is this a short term or long term impact? State ST or LT	Are there synergies between other policies (or options) which might amplify the effect? State Y or N	Commentary/Notes Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score
		Y			Y	P	LT	Y	When implemented together the policies which broadly seek to protect and enhance the natural environment are likely to result in significant positive effects.

Appraisal Summary

Overall, the policies are likely to result in positive effects on the natural and historic environment, both in terms of the integrity and conservation of these assets but also the wellbeing of the population. There are significant positive effects for objectives on flood risk management and heritage.

Chapter 6:

Site allocations and site options

This section discusses the preparation and Sustainability Appraisal of the site allocation policies included in the Rother Local Plan. It provides a summary of the site selection process and how the SA informed this. The section also covers SA of the ‘area-based’ policies in the Local Plan, which sit alongside the site allocations and help give effect to the spatial strategy and sub-area visions.

- 6.1. The new Rother Local Plan includes a suite of site allocation policies. Site allocations identify areas of land where development is expected to take place during the plan period to meet identified housing, economic and other needs. Site allocations support and help give effect to the Development Strategy for the district. They provide clarity about the locations where new development will be directed to and built, together with supporting infrastructure, so that growth is plan-led and happens in a sustainable way.
- 6.2. The following section of the SA summarises the process for identifying and selecting sites included as site allocation policies in the Rother Local Plan Pre-Submission version. It also discusses the process for undertaken the SA of these sites to-date, along with the key findings of this.
- 6.3. Further information on the site selection process is set out in the Housing and Economic Land Availability Assessment (HELAA) and Site Allocations Background Paper, which form part of the Local Plan evidence base.

SA of the Housing and Economic Land Availability Assessment sites

Background

- 6.4. To inform the preparation of the Local Plan, the Council has produced a HELAA in line with national planning policy and guidance. The purpose of the HELAA is to provide an assessment of the potential supply of land which is 'suitable, available and achievable' for housing and economic development over the plan period. The HELAA can also help to identify land that may be suitable for other uses to support future development, such as land for renewable energy infrastructure, nature recovery and other green infrastructure.
- 6.5. The HELAA is the starting point for considering sites that may be appropriate to bring forward in the Local Plan as site allocation policies – the HELAA effectively

provides the initial broad range of site options (or alternatives) to be considered during the preparation of the plan.

- 6.6. The HELAA is reviewed and updated during the preparation of the Local Plan to ensure it reflects the latest available information. A draft HELAA (April 2024) was published to support the first Regulation 18 consultation on the draft Rother Local Plan 2020-2040, which was carried out during April – July 2024. The study was then updated and reviewed, and a revised draft HELAA (January 2026) was published to support the second Regulation 18 consultation on the draft Rother Local Plan – Development Strategy and Site Allocations. A further review and update was carried out to support the Regulation 19 stage consultation.

Draft HELAA (2024)

- 6.7. The HELAA started with a site identification exercise. An initial list of sites was compiled from a wide range of sources, as follows:
- Reassessment of sites previously considered through land assessment exercises, including the Council's Strategic Housing Land Availability Assessment (2013) and Neighbourhood Plans;
 - Public 'Call for Sites', which was launched in October 2020;
 - Council officer search for sites, including desktop research and identification of sites owned by Rother District Council or other local authorities;
 - Sites that had been subject to a planning application, with a size threshold commensurate to the HELAA criteria;
 - Sites subject to an allocation through the Development and Site Allocations Local Plan, or an extant Neighbourhood Plan but not yet delivered; and
 - Sites on the Council's Brownfield Land Register.

- 6.8. Over 900 sites were identified through this exercise. Following which, an initial (Stage 1) assessment was undertaken to identify 'potentially suitable' sites. Thereafter, the 'potentially suitable sites' were taken forward for a further (Stage 2) suitability assessment, which considered the availability and achievability of sites, along with their potential development capacity.
- 6.9. It is important to note that a number of sites were removed from the HELAA because construction on them had either commenced or completed, and these sites would therefore not form part of the future housing land supply.
- 6.10. The draft HELAA (2024) indicated that there was a potential supply of land and sites for between 5,158 – 7,287 new dwellings and 78,165 – 104,399 new employment floorspace across the district.
- 3) Rejected submitted sites: sites submitted through the 'Call for Sites' exercise and therefore considered available but assessed through the HELAA as unsuitable or not achievable.
- 6.13. Whilst the draft HELAA and SA are both site assessment tools there are distinctions between their purpose and evaluation criteria. The draft HELAA considers sites for their deliverability (in the context of the Local Plan), whereas the SA assesses the relative sustainability of sites (against the SA Framework). However, there are similarities between some of their criteria, particularly as the 'suitability of sites' is considered in the wider context of ensuring the Local Plan supports sustainable development, consistent with the NPPF.
- 6.14. In terms of the 'rejected submitted' sites, whilst these sites are available, the HELAA has determined that they are not suitable or achievable, and therefore not considered to be developable; however, assessing these sites through the SA helps to compare their sustainability merits as potential site allocation options (or reasonable alternatives).

SA of the draft HELAA (2024) sites

- 6.11. The draft Rother Local Plan (2024) did not include proposed site allocation policies. However, it did provide information on findings of the draft HELAA (2024). Furthermore, the draft HELAA was published during the first Regulation 18 stage consultation, with the public invited to submit representations on it.
- 6.12. The Interim Sustainability Appraisal (2024) provided an assessment of the draft HELAA (2024) sites. The SA considered 3 main categories of HELAA sites:
 - 1) Identified (committed) sites: sites allocated for development, sites which have an extant planning permission, or sites with a current planning application with a resolution to grant, subject to a legal agreement;
 - 2) Potential additional sites: newly identified sites which may be suitable, available and achievable for development over the plan period, as set out in the HELAA; and
- 6.15. The Interim Sustainability Appraisal report (2024) provided a series of assessment tables. The tables set out scores for each category of site (committed, potentially suitable, and rejected submitted) against the 20 SA objectives, as set out in the SA Framework. The tables were supplemented with supporting text under the following sub-headings: summary for all sites, sustainability impacts and conclusions. The Interim report should be referred to for full information on the site assessment results, which are not included here in order to avoid duplication.
- 6.16. The overall conclusions of the SA for the respective site types in the HELAA (2024) are set out in **Figure 31**.

Figure 31: Overall conclusions on SA of draft HELAA (2024) sites

Site type	Conclusion
Committed sites	There are no identified sustainability impacts which prevent the sites forming an appropriate part of the Local Plan's development strategy.
Potential additional sites	The SA process has identified the key objectives that are impacted by development constraints on the identified sites. Whilst some constraints can be mitigated further work will be required at the next stage of the plan to detail specific policy requirements for the site if they progress through to planning applications.
Rejected submitted sites	The SA process has identified the key objectives that are impacted by development constraints on the submitted sites. At this stage in the plan making process the sites have been considered as undevelopable within the Draft HELAA and whilst they could be considered reasonable alternatives, it is considered that significant harm would be caused through identifying the sites as part of the development strategy.

6.17. The SA of the draft HELAA (2024) sites provided an important preliminary appraisal of potential site allocation options against the SA Framework. This helped to inform the considerations on the Development Strategy, the selection of site allocations for the new Local Plan, and early stage drafting of associated site allocation policies.

6.18. The Interim SA Report (2024) acknowledged that further detailed assessments of sites would be undertaken once proposed site allocation policies were confirmed, at the next stage of the plan process.

SA of the proposed site allocation sites and reasonable alternatives

6.19. The draft Rother Local Plan – Development Strategy and Site Allocations (2026) included

proposed site allocation policies. As discussed above, the identification and selection of these sites has been informed by the Housing and Economic Land Availability Assessment.

Draft HELAA (2026)

6.20. Following the first Regulation 18 consultation on the draft Rother Local Plan 2020-2040. the HELAA was reviewed and updated. As part of this review, the Council:

- Relaunched the 'Call for Sites' in summer 2025, which has been open since Autumn 2020 (and remains open), and assessed new sites submitted;
- Reviewed representations on the first Regulation 18 consultation on the Draft Rother Local Plan (2024), including comments on the Draft HELAA;
- Checked planning records to confirm the latest status of sites with planning permission (i.e., not started, under construction, built or lapsed);
- Re-assessed draft HELAA (2024) sites to determine whether they are suitable for development. This includes re-assessing previously rejected sites, particularly those known to be available, to determine whether development could be made acceptable in principle across all or part of the site;
- Undertook site visits;
- Engaged with landowners and developers to understand whether land identified is available for development, and if so, the expected timeframes for this;
- Re-assessed the development potential of suitable sites by considering density options, to ensure the optimal use of land.

6.21. The updated draft HELAA (2026) should be referred to for information on the

methodology and detailed findings of this exercise.

Draft Final HELAA (2026)

- 6.22. Following the second Regulation 18 consultation, the HELAA was reviewed and updated to inform the Regulation 19 Local Plan, as discussed below.

The proposed site allocation sites and reasonable alternatives

- 6.23. As with the initial HELAA (2024), the updated studies involved site identification and assessment exercises. These lead to the collation of a portfolio of sites defined as: identified (committed); potential additional; or rejected. All sites that were assessed through the draft HELAA (2026) and as suitable, available and achievable were taken forward as proposed site allocation in the draft Local Plan – Development Strategy and Site Allocations (2026). The Interim SA Report (2026) should be referred to for the portfolio of sites assessed at that time.
- 6.24. Following the second Regulation 18 consultation, the HELAA was reviewed again to take account of the latest available information on sites. This led to the exclusion of some sites that were previously assessed as being suitable, available and achievable, as well as the identification of new such sites. All sites assessed as suitable, available and achievable have been included in the Regulation 19 plan.
- 6.25. The Council considers the reasonable alternative sites to be those sites that have been submitted through the ‘Call for Sites’ or are otherwise understood to be potentially available but have been rejected through the HELAA on the basis that they are not suitable and/or achievable.

Methodology for assessing site allocation sites and reasonable alternatives

- 6.26. Whilst the SA process is intended provide for an objective assessment of a plan proposal (and reasonable alternatives), it invariably introduces an element of subjective judgement. To help overcome this issue with the SA of proposed site allocation options, a bespoke appraisal template has been produced for this Local Plan. This template sets out clear decision-making criteria for assessing the likely environmental, social and economic effects of introducing new development on specified sites. The criteria are drawn from the Council’s existing evidence base along with other recognised and publicly available data sources and aided by the use of Geographical Information System (GIS) data. The template helps to standardise the SA process and provides for a consistent and transparent approach to the site assessments.
- 6.27. The site appraisal template is set out in **Appendix 5** of this Sustainability Appraisal report. It builds on and applies the SA Framework established in the SA Scoping Report. It also provides for a more granular assessment of the sustainability of sites when compared to the preliminary SA of the HELAA sites in the Interim Sustainability Appraisal (2024). This more detailed assessment is commensurate with the current stage of the plan process, where site allocation policies are now being considered.
- 6.28. Notably, not all of the 20 SA objectives are covered by the template. Whilst the majority of objectives are addressed, some have been screened out after careful consideration. There are several reasons for this, but it is mainly owing to the principle that impacts on some objectives will be more appropriately dealt with elsewhere through the SA of the Local Plan (e.g., SA of the Development Strategy, and thematic based ‘strategic’ and ‘development management’ policies). Also, there are some objectives where the same answer to a criterion, or criteria, would apply

to all sites. For example, on SA objective 8, the introduction of new homes on a site will score as positive as this will help to address identified local need. Similarly, for SA objective 4, the introduction of new development will add to rather than minimise water consumption in the district. Therefore, it is considered appropriate to remove such objectives from the template, as they will not be particularly helpful in a comparative analysis of the sustainability merits of different sites.

6.29. In line with the above, the SA objectives screened out from the site assessment template are as follows:

- SA4: Minimise water consumption
- SA8: More opportunities are provided for everyone to in a suitable home to meet their needs.
- SA10: Safe and secure environments are created and there is a reduction in crime and fear of crime.
- SA13: Through waste reuse, recycling and minimisation, the amount of waste for disposal is reduced.
- SA16: Economic performance is improved.
- SA18: Levels of poverty and social exclusion are reduced, and the deprivation gap is closed in the more deprived areas.
- SA19: Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve. The reasons for this are set out in the template itself.

6.30. At this stage in the plan process, when site allocations options are being appraised, the template and its criteria are applied on a 'policy off' basis. This means the sites are assessed based on existing conditions, and do not take account of mitigation or other

measures which might help to offset adverse impacts.

6.31. Mitigation measures are considered subsequent to the site assessment. This SA report sets out a series of potential mitigations to help avoid or minimise adverse impacts of new development on sites, or indeed, facilitate or improve positive impacts of development sites in areas across the district. The mitigation measures have been considered through the development of policies for allocated sites. This is part of the iterative process of SA.

6.32. This SA report brings the assessment of sites made using the Appendix 5 template, together with additional considerations on the site allocation policies (and associated development requirements), and the full suite of Local Plan policies, including the thematic topic or 'development management' style policies. Chapter 7 of the SA report considers the cumulative effects of the plan, when it is considered as a whole.

Which sites have been assessed?

6.33. As noted above, all sites that have been identified in the HELAA as suitable, available and achievable have been taken forward as site allocations in the draft Local Plan. However, not all such sites have been assessed using the Appendix 3 template. As set out in **Error! Reference source not found.** below, sites with a planning permission or resolution to grant have not been appraised. This is on the basis that they have been assessed through the development management process - and through this have been judged to comply with the policies in the extant Development Plan and NPPF, which both seek to contribute towards the delivery of sustainable development.

6.34. Of other sites that are suitable, available and achievable - extant site allocations, including those in Neighbourhood Plans, which have not yet been delivered, have been assessed using the Appendix 5 template, along with

potential additional sites (i.e., new sites identified through the HELAA which are not currently allocated and do not have planning permission). Sites submitted via the 'Call for Sites', or which are understood to be potentially available, but rejected by the HELAA have also been considered, as they comprise reasonable alternatives at this time.

- 6.35. It is important to note that whilst some sites have not been appraised using the Appendix 5 template (i.e., sites with extant planning consent or resolution to grant consent) they will still be considered through the SA process. All proposed site allocation sites will form part of the wider SA of the Development Strategy, which they form and will help give effect to. Further, the sites will be appraised in relation to the whole of the local plan, at the Regulation 19 stage of plan production and SA.

Reading the site assessments

- 6.36. The following section of this report provides the findings of the site assessments in terms of their performance against selected SA Objectives. For organisational purposes, the assessments are set out by the 5 sub-areas of the district and the main settlements within these.

- 6.37. The assessments include:

- An overall summary of the site assessments;
- A statement setting out the main sustainability issues identified through the site assessments;
- A list of suggested mitigation measures to help avoid predicted negative or adverse effects of development of the sites, or to improve positive scores; and
- Site assessment tables, which have been completed using the template discussed above. The tables for the sites proposed to be taken forward as site allocations in the Local Plan are included within this chapter of the report. The assessment

tables of 'rejected' sites are included within the report Appendices.

- 6.38. The mitigation measures are intended to help inform policy production, and have been considered as part of work on the plan.
- 6.39. It is noted that delivery of strategic and other infrastructure will play an important role in supporting the sustainability of the Local Plan, including the site allocations, particularly in helping to mitigate local impacts of new development. The Council has prepared a draft Infrastructure Delivery Plan (IDP) (2026) which will assist in identifying any deficiencies or gaps in infrastructure to adequately support the levels of growth and development set out in the draft Local Plan. The Council has and will continue to engage with infrastructure providers and other key stakeholders to prepare the IDP. The current IDP has been significantly updated since it was first published in April 2024, and feedback from stakeholders will be used to confirm initial findings and supplement the information currently set out. Findings from the IDP have inform the plan's production, including site specific policies.

Reasons for choosing the preferred option sites

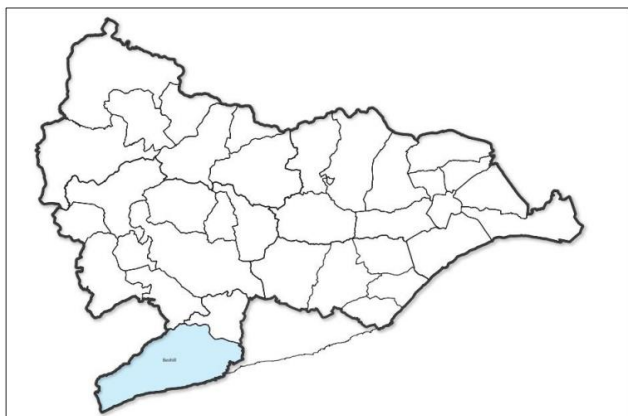
- 6.40. The preferred option sites have been identified through the HELAA, by being assessed through that process as meeting the criteria of suitable, available and achievable, in accordance with the NPPF and PPG. At this stage in the preparation of the Local Plan, the sites identified through the HELAA as meeting these criteria are insufficient to accommodate the number of homes required to meet Rother's Local Housing Need (LHN) as calculated through the national "standard method". Therefore, all sites assessed through the HELAA as suitable, available and achievable are included as preferred options and have been progressed to proposed allocations in the Regulation 19 Local Plan. The SA has informed the detail of the proposed site

allocation policies, for example, to identify mitigations to enhance the sustainability of sites. As noted above, sites rejected through the HELAA as unsuitable, but which are known to be available, have also been subject to SA as these sites comprise reasonable alternatives at this time. The SA of these sites may help to inform considerations later in the plan process, should the sites be brought forward into the Plan.

Figure 32: Site assessed using the template

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

SA of the Bexhill sites



6.41. The following section sets out the SA findings for the Bexhill sub-area site options. The Bexhill sub-area is itself divided into four areas: the Central Urban Area and the Suburban Area (both of which are focused in the established built form of the settlement), and the Western and Northern Areas (both of which are more peripheral and include greenfield land. The SA focusses on the preferred options (e.g. sites taken forward as proposed site allocations in the draft Local Plan, excluding those with planning permission and resolution to grant subject to legal agreement). The scoring tables for the proposed site allocations are set out at the end of this sub-section, and scoring tables for the 'rejected' HELAA sites included at Appendix 4 of this report.

Bexhill Central Urban Area

6.42. Overall, the appraisal suggests there a greater number of positive and neutral effects of the sites in the Central Urban Area, compared to negative effects. There are some significant positive effects relating to the re-use of brownfield land, the sustainability of the location and proximity to a range of services and public transport. The only significant negative effects identified relate to risks of surface water flooding (which affects the majority of sites assessed), and on some sites, proximity to heritage assets and the effect on existing employment uses.

Main sustainability issues

- 6.43. The main sustainability issues in the Central Urban Area identified relate to flood risks, particularly from surface water flooding.
- 6.44. Sites generally scored positively on the appraisal in relation to the re-use of brownfield land, landscape impact, access to services, public open space and Public Rights of Way, and they are not constrained by the presence of biodiversity assets or features. Additionally, many of the sites scored positively in climate mitigation terms due to being located within a potential heat network cluster.

Suggested mitigation measures

- 6.45. The following measures are suggested to help avoid or mitigate negative impacts and improve overall sustainability of the sites in the Central Urban Area:
- Sequential and Exception tests, and site-specific Flood Risk Assessments and the incorporation of SuDS.
 - Measures to protect the setting of heritage assets.
 - The inclusion of employment uses within allocations where possible.

Bexhill Suburban Area

- 6.46. There are only two proposed allocated sites in this area. There are more positive and neutral effects compared to negative effects. The main significant positive effects, affecting one site, relate to the sustainability of the location and access to services. The only significant negative effects, each affecting one of the sites, relates to surface water flood risk and the impact on greenfield land.
- 6.47. In respect of the rejected sites in this area, there are a mixture of positive, neutral and negative effects. Again, significant positive effects relate to the sustainability of the location and access to service. The only significant negative effects, affecting some

sites, are due to risks of surface water flooding and the impact of developing greenfield land.

Main sustainability issues

- 6.48. Sustainability issues identified for the proposed allocated sites relate to the proximity to Priority Habitat, surface water flood risk within one site, impact on greenfield land and landscape impact, and one site being within a SSSI Impact Risk Zone. These sites generally scored positively on the appraisal in relation to access to services, public open space and Public Rights of Way, although they are some distance to a railway station.
- 6.49. Sustainability issues identified for the rejected sites in this area include impacts on biodiversity, flooding (including surface water flooding and groundwater flooding affecting some sites), impacts of developing greenfield land and landscape impacts. These sites generally scored positively on the appraisal in relation to access to services, public open space and Public Rights of Way, and most are not constrained by heritage assets.

Suggested mitigation measures

- 6.50. The following measures are suggested to help avoid or mitigate negative impacts and improve overall sustainability of the sites in the Bexhill Suburban Area:
- The inclusion of green infrastructure and land for BNG within sites, to help mitigate the loss of greenfield land.
 - The protection of landscape features and Priority Habitats and inclusion of landscaping as part of development proposals.
 - Measures to mitigate surface water flood risks.
 - Measures to improve access to public transport.

Bexhill Western Area

- 6.51. There are a mix of positive, neutral and negative effects for proposed allocation sites in the Bexhill Western Area. There are no significant positive effects, but some sites do have significant negative effects relating to risks of flooding (particularly surface water flooding), biodiversity impacts, heritage impacts, impacts on agricultural land, impacts on greenfield land and landscape sensitivity outside the High Weald National Landscape.
- 6.52. The picture for the rejected sites in this area is similar, with a mixture of positive, neutral and negative effects, no significant positive effects but some significant negative effects affecting some sites, particularly relating to impacts on biodiversity, flood risks, impacts on greenfield land and landscape sensitivity outside the High Weald National Landscape.

Main sustainability issues

- 6.53. The sustainability issues affecting the proposed allocated sites in the Bexhill Western Area include, for some sites, biodiversity, flooding and heritage impacts, impacts on greenfield and agricultural land, and landscape sensitivity. However, flooding constraints often affected only small parts of sites. These sites generally scored positively on the appraisal in relation to access to public open space and Public Rights of Way, and they did not have groundwater flooding constraints. These sites are closest to the settlement of Little Common (although some are a significant distance from services within the settlement), and while this means that they score positively in terms of the sustainability of the location, most sites are not close to a railway station.
- 6.54. Sustainability issues identified for the rejected sites in this area include impacts on biodiversity, flooding (including flood zones 2 and 3 and surface water flooding), heritage, impacts of developing greenfield land and agricultural land and landscape sensitivity. These sites generally scored positively on the

appraisal in relation to public open space and Public Rights of Way, and they did not have groundwater flooding constraints. Like the proposed allocation sites, most sites are closest to the settlement of Little Common which is generally sustainable although most sites are not close to a railway station. One site was closest to Normans Bay which, as a settlement, scores very poorly in sustainability terms, except in respect of its distance to a railway station.

Suggested mitigation measures

6.55. The following measures are suggested to help avoid or mitigate negative impacts and improve overall sustainability of the sites in the Bexhill Western Area:

- The inclusion of green infrastructure and land for BNG within sites, to help mitigate the loss of greenfield land and agricultural land.
- The protection of landscape features and inclusion of landscaping as part of development proposals.
- The protection of biodiversity features.
- The protection of the setting of heritage assets.
- Measures to mitigate flood risks, particularly avoiding development in areas of sites which are at risk of flooding, and the inclusion of appropriate SuDS.
- Measures to improve access to essential services and a railway station.

Bexhill Northern Area

6.56. There are a mix of positive, neutral and negative effects for proposed allocation sites in the Bexhill Northern Area. The only significant positive effect, affecting one site, relates to the re-use of brownfield land. Some sites do have significant negative effects relating to risks of flooding (particularly surface water flooding), impacts on greenfield land, impact on higher quality

agricultural land, access to essential services, and landscape sensitivity outside the High Weald.

6.57. Rejected sites in this area also have a mixture of positive, neutral and negative effects, including some significant negative effects relating to biodiversity impact (particularly impacts on Priority Habitats), flood risks, impacts on greenfield land, access to services and landscape sensitivity outside the High Weald. Some rejected sites have significant positive scores in respect of their access to services.

Main sustainability issues

6.58. The main sustainability issues affecting the proposed allocation sites in the Bexhill Northern Area include biodiversity impacts, with many sites adjoining ancient woodland and Priority Habitats, and landscape sensitivity. Many sites also have risks of surface water flooding, although this often affects only small parts of sites. Sites also score negatively due to impacts on greenfield and agricultural land, and some sites have heritage constraints. These sites generally scored positively on the appraisal in relation to access to services (with two exceptions), public open space and Public Rights of Way, and most sites did not have groundwater flooding constraints. The majority of these sites are closest to the settlement of Sidley (although some are a significant distance from services within the settlement) and while this means that they score positively in terms of the sustainability of the location, most sites are not close to a railway station. Two sites are closest to the settlement of Lunsford Cross which has a poor sustainability score.

6.59. Sustainability issues identified for the rejected sites in this area include impacts on biodiversity (particularly Priority Habitats), flooding (including flood zones 2 and 3 and surface water flooding), landscape sensitivity and impacts of developing greenfield land and agricultural land. These sites generally scored positively on the appraisal in relation to public open space and Public Rights of

Way, and they did not have groundwater flooding constraints. Some sites are closest to Sidley, which has a good range of services, although some are closest to Lunsford Cross which is unsustainable. Other sites are counted as being closest to Bexhill settlement which has a good range of services and public transport, although the sites are some distance from the services.

Suggested mitigation measures

6.60. The following measures are suggested to help avoid or mitigate negative impacts and improve overall sustainability of the sites in the Bexhill Northern Area:

- The inclusion of green infrastructure and land for BNG within sites, to help mitigate the loss of greenfield land and agricultural land
- The protection of landscape features and inclusion of landscaping as part of development proposals
- The protection of biodiversity features
- The protection of the setting of heritage assets
- Measures to mitigate flood risks, particularly avoiding development in areas of sites which are at risk of flooding, and the inclusion of appropriate SuDS
- Measures to improve access to essential services and a railway station.

SA Objective		Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change	SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice		
SA indicator reference			1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
Bexhill																													
Central Urban Area																													
BX5 – Land south-east of Beeching Road (BEX0008)	200	++	0	0	0	0	0	0	++	0	--	+	0	++	+	+	++	0	0	N/A	0	0	N/A	+	++	0	0	++	++
BX6 – Land adjacent to Bexhill Town Hall (BEX0077)	36	++	0	0	0	0	0	+	++	0	--	+	0	++	+	+	++	--	0	N/A	0	0	N/A	+	++	--	0	++	++
BX7 – Sainsbury’s site, 1 Buckhurst Place (BEX0078)	75	++	0	0	0	0	0	+	++	0	--	+	0	++	+	+	++	-	0	N/A	0	0	N/A	+	++	--	0	++	++
BX8 – Former Bexhill High School site, Down Road (BEX0235)	80	++	0	0	0	0	0	+	++	-	--	+	0	++	+	+	++	0	-	N/A	0	0	N/A	+	++	0	N/A	++	0
BX9 – Land south of Terminus Road (BEX0238)	14	++	0	0	0	0	0	0	++	0	--	+	0	++	+	+	++	0	0	N/A	0	0	N/A	+	++	--	N/A	++	++
BX10 – 30 Dorset Road	This site has outline planning permission (RR/2024/1065/P)																												
BX11 – Rear of 11 Endwell Road	This site has planning permission (RR/2024/1126/P)																												
BX12 – 2a Sackville Road (BEX0011)	6	++	0	0	0	0	0	+	++	0	--	+	0	++	+	+	++	-	0	N/A	0	0	N/A	+	++	0	+	++	++
BX13 – Eversley Road Car Park, Eversley Road (BEX0155)	10	++	0	0	0	0	0	+	++	0	+	+	0	++	+	+	++	-	0	N/A	0	0	N/A	+	++	0	N/A	++	++
Suburban Area																													
BX14 – Land at Broad Oak Park (BEX0250)	8	+	-	0	0	0	-	0	+	0	--	+	0	+	+	+	+	0	0	0	0	0	N/A	0	+	-	0	+	0
BX15 – Land north of Broadoak Lane (BEX0161)	35	++	0	0	0	0	0	0	++	0	+	+	0	++	+	+	++	0	0	0	0	0	N/A	-	--	0	N/A	++	0
SA Objective		Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change	SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice		
SA indicator reference			1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
West Bexhill Growth Area																													
BX17 – Gorses Car Park and open space, The Gorses (BEX0089)	10	+	-	0	0	0	0	0	+	0	-	+	0	+	+	+	+	0	0	N/A	0	0	N/A	0	0	0	N/A	+	+
BX18 – Land off Spindlewood Drive	The site has outline planning permission (RR/2017/1705/P)																												

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
BX19 – Land north of Barnhorn Manor Caravan Park (BEX0215)	20	+	-	0	0	0	0	+	0	-	+	0	+	+	+	+	-	0	-	0	0	N/A	-	-	0	N/A	+	0
BX20 – Land south of Barnhorn Road (MIXED USE) (BEX0233)	400	+	-	-	0	-	0	+	0	-	+	0	+	+	+	+	-	0	-	0	0	N/A	-	-	-	0	+	0
BX21 – Land north of Rosewood Park	The site is subject to a planning application with a resolution to approve subject to a S106 agreement (RR/2023/1721/P)																											
BX22 – Land east of Sandhurst Lane (BEX0177)	68	+	-	-	0	-	0	+	0	-	+	0	+	+	+	+	0	0	0	0	0	N/A	-	-	0	N/A	+	0
BX24 – Land south of Sandhurst Lane (BEX0239)	25	+	-	0	-	0	+	+	0	-	+	0	+	+	+	+	-	0	-	0	0	N/A	-	-	0	N/A	+	0
BX25 – Beeches Farm and land north of Barnhorn Road (MIXED USE) (BEX0219)	540	+	-	0	0	-	0	+	0	-	+	0	+	+	+	+	-	0	-	0	0	N/A	-	-	0	+	+	0
BX26 – Land at Northeye and adjoining land (BEX0240)	364	+	-	0	0	-	0	+	-	0	+	0	+	+	+	+	0	0	-	0	0	N/A	-	0	0	N/A	+	0

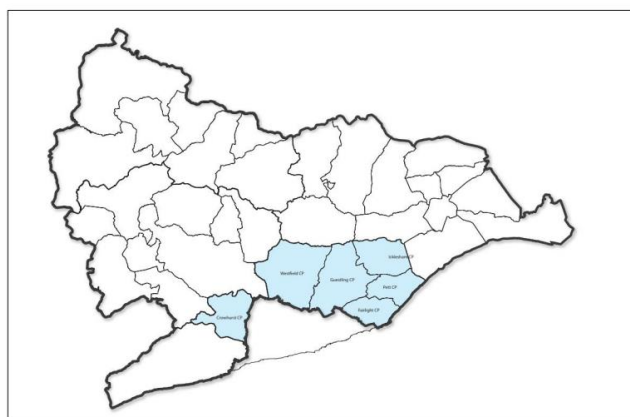
SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
North Bexhill Growth Area																												
BX29 – Land at Kiteye Farm (BEX0241)	300	+	0	-	-	-	0	+	--	--	+	0	+	+	+	+	0	0	-	0	0	N/A	-	-	0	N/A	+	0
BX30 – Land west of Watermill Lane (south)	The site is subject to a planning application with a resolution to approve subject to a S106 agreement (RR/2022/1584/P)																											
BX31 – Land west of Watermill Lane	The site is subject to a planning application with a resolution to approve subject to a S106 agreement (RR/2021/2545/P)																											
BX32 – Land east of Watermill Lane (BEX0242)	170	+	-	-	0	-	0	+	--	--	+	0	+	+	+	+	-	0	-	0	0	N/A	-	--	0	N/A	+	0
BX34 – Land north of Haven Brook Avenue (east) (BEX0243)	230	+	-	-	0	-	0	+	0	--	-	0	+	+	+	+	-	0	-	0	0	N/A	--	--	0	N/A	+	0
BX35 - Land north of Haven Brook Avenue (west) (BEX0244)	100	+	0	-	0	-	0	+	0	+	+	0	+	+	+	+	0	0	-	0	0	N/A	-	--	0	N/A	+	0
BX36 – Land west of Ninfield Road roundabout (BEX0245)	80	+	0	-	0	-	0	+	0	--	+	0	+	+	+	+	0	0	-	0	0	N/A	-	0	0	N/A	+	0
BX37 – Land west of Ninfield Road (MIXED USE) (BEX0220)	400	-	-	-	0	-	0	-	0	--	+	0	--	+	+	-	-	0	-	0	0	N/A	-	-	-	0	+	0
BX38 – Land at St Francis Farm, Ninfield Road (BEX0162)	70	-	-	0	0	0	0	-	0	--	+	0	--	-	+	-	0	0	-	0	0	N/A	-		0	+	+	0
BX39 – Land at Freezeland Farm, Freezeland Lane	This site has outline planning permission (RR/2023/1706/P)																											

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
BX40 – Former Sidley Sports Ground, Glovers Lane (BEX0032)	50	+	-	0	0	-	0	+	0	--	+	0	+	+	+	+	0	0	N/A	0	0	N/A	0	0	0	N/A	+	0
BX41 – Land adjacent to 276 Turkey Road (BEX0005)	30	+	-	-	-	-	0	+	0	--	+	0	+	+	+	+	0	0	0	0	0	N/A	-	--	0	N/A	+	0
BX42– Cemetery Lodge, 250 Turkey Road	This site has planning permission (RR/2022/1233/P)																											
BX43 – Our Lady of the Rosary Church, Southlands Road	This site has planning permission (RR/2024/127/P)																											
BX44 – Land at Worsham Farm (east)	This site has planning permission (RR/2015/1760/P, RR/2022/2477/P, RR/2024/501/P)																											
BX45 – Land at Worsham Farm (west) (MIXED USE) (BEX0194)	66	+	0	-	0	-	0	+	0	--	+	0	+	+	+	+	0	0	--	0	0	N/A	-	--	0	N/A	+	0

Bexhill – economic development

SA Objective		Indicative floorspace	SA1: Air pollution				SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b				
Bexhill																																
BX23 – Land at Barnhorn Green (BEX0021)	2,025	This site has planning permission (RR/2022/3018/P)																														
BX33 – Land at Levetts Wood and Oaktree Farm (BEX0017)	38,000	+	-	-	-	-	0	+	0	--	+	0	+	+	+	+	-	0	--	0	0	N/A	-	--	0	+	+	0				
BX46 – Plot 7, Bexhill Enterprise Park, Mount View Street (BEX0169)	26,000	+	-	-	0	--	0	+	0	--	+	0	+	+	+	+	0	0	-	0	0	N/A	-	--	0	+	+	0				
BX47 – Bexhill Enterprise Park – Escarpment Site B, south of Glovers End (BEX0246)	5,800	+	-	0	0	-	0	+	0	--	+	0	+	+	+	+	0	0	-	0	0	N/A	-	--	0	+	+	0				
BX48 – Land west of Bexhill Innovation Park, Glovers End (BEX0247)	6,400	+	-	0	0	0	0	+	0	--	+	0	+	+	+	+	0	0	-	0	0	N/A	-	--	0	+	+	0				

SA of the Southern Rother and Hastings Fringes sites



6.61. The following section sets out the SA findings for the Southern Rother and Hastings Fringes sub-area site options, focussing on the preferred options (e.g. sites taken forward as proposed site allocations in the draft Local Plan, excluding those with planning permission and resolution to grant subject to legal agreement). This sub-area includes the parishes of Crowhurst, Fairlight, Guestling, Icklesham (west), Pett and Westfield, and the “Hastings Fringes” themselves, which are those parts of the district which directly border the borough of Hastings. The scoring tables for the proposed site allocations are set out at the end of this sub-section, and scoring tables for the ‘rejected’ HELAA sites included at Appendix 4 of this report.

Crowhurst

6.62. Overall, the appraisal suggests there are a mix of likely positive, neutral and negative effects of the sites in Crowhurst. There are some significant negative effects identified in relation to the High Weald National Landscape and other biodiversity issues. The rejected sites also have some significant flood risk issues.

Main sustainability issues

6.63. The main sustainability issues identified relate to the use of greenfield and Grade 3 agricultural land for new development. There are also some issues in relation to access to

some services which impacts the overall sustainability of the settlement, but Crowhurst does contain a primary school and railway station. The proposed site allocations are located in the High Weald National Landscape.

6.64. Sites generally scored positive on the appraisal in relation access to open space as well as Public Rights of Way, and they are not significantly constrained by the presence of heritage assets. The proposed allocations are also not majorly impacted by flood risk issues; the rejected sites contain areas of land within Flood Zone 3.

Suggested mitigation measures

6.65. The following measures are suggested to help avoid or mitigate negative impacts and improve overall sustainability of the sites in Crowhurst:

- Landscape and visual impact assessment in relation to HWNL and local character.
- Site specific Flood Risk Assessment and the incorporation of SuDS in the development.
- On-site provision of outdoor amenity space, and/or contributions to public open space.
- Explore opportunities to improve access to local services.
- Archaeological Surveys in relation to sites within Archaeological Notification Areas.

Fairlight

6.66. Overall, the appraisal suggests there are a mix of likely positive, neutral and negative effects of the sites in Fairlight. There are some significant negative effects identified in relation to the High Weald National Landscape.

Main sustainability issues

6.67. The main sustainability issues identified relate to the use of greenfield and Grade 3 agricultural land for new development as well as the surface water flood risk on land proposed for allocation. There are also some issues in relation to the overall sustainability and access to services in Fairlight Cove. All of the sites are located in the High Weald National Landscape.

6.68. Sites generally scored positive on the appraisal in relation access to open space as well as Public Rights of Way, and they are not significantly constrained by the presence of heritage assets. Many sites do not have any major biodiversity constraints. There are some flooding constraints.

Suggested mitigation measures

6.69. The following measures are suggested to help avoid or mitigate negative impacts and improve overall sustainability of the site in Fairlight:

- Landscape and visual impact assessment in relation to HWNL and local character.
- Requirements for the protection of habitats sites, with appropriate buffers between the built area.
- Site specific Flood Risk Assessment and the incorporation of SuDS in the development.
- Explore opportunities to improve access to local services.

Guestling (including Guestling Green, Three Oaks and Hastings Fringes sites)

6.70. Overall, the appraisal suggests there are a mix of likely positive, neutral and negative effects of the sites in Guestling parish. There are some significant negative effects identified in relation to the High Weald National Landscape and access to services in many parts the parish that are not directly

contiguous with Hastings borough. There was a mix of effects regarding flood risk issues as well as access to open space throughout the Parish. There is one site proposed for allocation for employment uses and this site scored more positively by virtue of being in the Hastings Fringes and therefore being accessible to services and also having connections to the countryside, including Public Rights of Way.

Main sustainability issues

6.71. The main sustainability issues identified relate to the use of greenfield and Grade 3 agricultural land for new development as well as the surface water flood risk on some sites proposed for allocation. There are also some issues in relation to access to some services, chiefly essential services, in Guestling Green and Three Oaks, though Guestling Green contains a primary school and, Three Oaks does contain a railway station. All of the sites are located in the High Weald National Landscape, and some sites either contain or are adjacent to biodiversity features such as Ancient Woodland and Priority Habitats.

6.72. Sites generally scored positive on the appraisal in relation access to Public Rights of Way and they are not significantly constrained by the presence of heritage assets, though some sites are in close proximity. There are also limited risks from ground water flooding.

Suggested mitigation measures

6.73. The following measures are suggested to help avoid or mitigate negative impacts and improve overall sustainability of the sites in Guestling parish:

- Landscape and visual impact assessment in relation to HWNL and local character.
- Requirements for the protection of habitats sites, with appropriate buffers between the built area.

- Site specific Flood Risk Assessment and the incorporation of SuDS in the development.
- On-site provision of outdoor amenity space, and/or contributions to public open space.
- Explore opportunities to improve access to local services.

Icklesham (only including Icklesham village)

6.74. Overall, the appraisal suggests there are a mix of likely positive, neutral and negative effects of the sites in Icklesham village. There are some significant negative effects identified in relation to the High Weald National Landscape. There was a mix of effects regarding surface water flood risk issues as well as access to open space throughout the Parish.

Main sustainability issues

- 6.75. The main sustainability issues identified relate to the use of greenfield and Grade 3 agricultural land for new development as well as the surface water flood risk on some of the sites assessed. There are also some issues in relation to access to some services, chiefly essential services, in the village. All of the sites are located in the High Weald National Landscape, and some sites either contain or are adjacent to biodiversity features such as Ancient Woodland and Priority Habitats. The sites assessed to the west of the village have poorer access to open space than those to the east where the recreation ground is.
- 6.76. Sites generally scored positive on the appraisal in relation access to Public Rights of Way and they are not constrained by the presence of heritage assets. Icklesham village is also somewhat well served by public transport, although it is not close to a railway station.

Suggested mitigation measures

6.77. The following measures are suggested to help avoid or mitigate negative impacts and improve overall sustainability of the sites in Icklesham village:

- Landscape and visual impact assessment in relation to HWNL and local character.
- Requirements for the protection of habitats sites, with appropriate buffers between the built area.
- Site specific Flood Risk Assessment and the incorporation of SuDS in the development.
- On-site provision of outdoor amenity space, and/or contributions to public open space.
- Explore opportunities to improve access to local services.

Pett

6.78. Overall, the appraisal suggests there are a mix of likely positive, neutral and negative effects of the sites. There are some significant negative effects identified in relation to the High Weald National Landscape and some biodiversity issues on some sites. There was also a mix of effects regarding surface water flood risk issues as well as access to different forms of services throughout the Parish.

Main sustainability issues

6.79. The main sustainability issues identified relate to the use of fully or majority greenfield and Grade 3 agricultural land, as well as the surface water flood risk on some of the sites assessed. There are also some issues in relation to access to some services, chiefly essential services, in the Parish. All of the sites are located in the High Weald National Landscape, and some sites either contain or are adjacent to biodiversity features such as Ancient Woodland and Priority Habitats.

6.80. Sites generally scored positive on the appraisal in relation access to Open Space and Public Rights of Way and they are generally not constrained by the presence of heritage assets.

Suggested mitigation measures

6.81. While there are no proposed site allocations in Pett parish, the following measures would be suggested to help avoid or mitigate negative impacts and improve overall sustainability of sites, should any rejected sites be brought forward:

- Landscape and visual impact assessment in relation to HWNL and local character.
- Requirements for the protection of habitats sites, with appropriate buffers between the built area.
- Site specific Flood Risk Assessment and the incorporation of SuDS in the development.
- Explore opportunities to improve access to local services.

Westfield

6.82. Overall, the appraisal suggests there are a mix of likely positive, neutral and negative effects of the sites in Westfield parish. There are some significant negative effects identified in relation to the High Weald National Landscape and some biodiversity and surface water flooding issues on some sites. There was also a mix of effects regarding other forms of flood risk issues. One site is proposed for employment uses.

Main sustainability issues

6.83. The main sustainability issues identified relate to the use of fully or majority greenfield and mainly Grade 3 agricultural land, as well as the surface water flood risk on some of the sites assessed. There are also some issues in relation to access to some services, chiefly public transport, in Westfield village and the

access to a range of essential services on those sites contiguous and closer to Hastings borough. Most of the sites are located in the High Weald National Landscape and some sites either contain or are adjacent to biodiversity features such as Ancient Woodland and Priority Habitats. A number of sites are also within an Archaeological Notification Area.

6.84. Sites generally scored positive on the appraisal in relation access to Open Space and Public Rights of Way. The general sustainability in Westfield village is relatively high compared to other settlements in Southern Rother and the Hastings Fringes which is aided by a range of essential services in the village.

Suggested mitigation measures

6.85. The following measures are suggested to help avoid or mitigate negative impacts and improve overall sustainability of the sites in Westfield parish:

- Landscape and visual impact assessment in relation to HWNL and local character.
- Requirements for the protection of habitats sites, with appropriate buffers between the built area.
- Site specific Flood Risk Assessment and the incorporation of SuDS in the development.
- Archaeological Surveys in relation to sites within Archaeological Notification Areas.

Residential site allocations

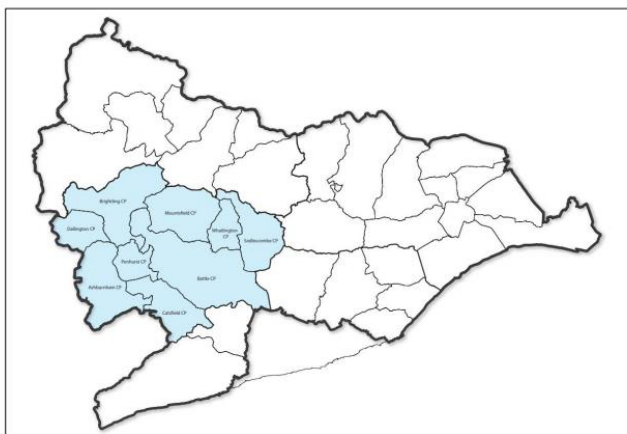
SA Objective		Indicative housing units	SA1: Air pollution	SA2: Biodiversity			SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
Southern Rother and the Hastings Fringes																												
Crowhurst																												
CR1 - Land at Station Road and Forewood Lane	25	0	-	0	0	0	0	0	0	+	0	0	-	+	+	0	-	-	-	0	--	-	N/A	--	0	N/A	+	N/A
CR2 - Land south of Forewood Rise	18	0	-	0	0	0	0	0	0	+	0	0	-	+	+	0	0	0	0	0	--	-	N/A	--	0	N/A	+	N/A
CR3 - Land adjacent to Station Car Park	6	0	-	0	0	0	0	0	0	+	+	0	-	+	+	0	0	0	-	0	--	0	N/A	--	0	N/A	+	N/A
Fairlight																												
FA1 - Land east of Waites Lane	35	0	-	0	0	-	0	0	0	--	+	0	0	+	+	0	0	0	-	0	--	-	N/A	--	0	N/A	+	N/A
Guestling																												
GU2 - Brackendale, Rock Lane	16	+	0	0	0	0	0	+	0	--	+	0	+	-	+	+	0	0	0	0	--	-	N/A	-	0	N/A	+	N/A
GU4 - Wild Meadows, Chapel Lane	15	-	-	0	0	0	0	-	0	--	+	0	--	+	+	-	-	0	-	0	--	-	N/A	-	0	N/A	+	N/A
GU5 - Former Guestling Highways Depot	8	-	-	0	0	0	0	-	0	0	+	0	--	+	+	-	-	0	-	0	--	0	N/A	++	0	N/A	+	N/A
GU6 - Field at Halfhouse, Butchers Lane	12	-	0	-	0	-	0	-	0	+	+	0	--	-	+	-	0	0	-	0	--	-	N/A	--	0	N/A	+	N/A
Icklesham																												
IK1 - Land adjacent to Little Sherwood Industry Park	30	0	-	0	0	0	0	0	0	+	0	0	-	-	+	0	0	0	-	0	--	-	N/A	--	0	N/A	+	N/A
IK2 - Land adjacent to Orchard Close	38	0	-	0	0	-	0	0	0	--	-	0	-	0	+	0	0	0	-	0	--	-	N/A	--	0	N/A	+	N/A
Westfield																												
WS1 - Land east of Beaney's Lane	104	0	0	--	0	--	0	0	0	--	-	0	-	+	+	0	0	0	0	0	--	-	N/A	-	0	N/A	+	N/A
WS2 - Land at Moor Farm	50	+	0	0	0	0	0	+	0	0	+	0	+	+	+	+	-	-	-	0	--	-	N/A	--	0	N/A	0	N/A
WS3 - Land on east side of Cottage Lane	RR/2022/1118/P (outline planning permission for 20 dwellings)																											

Economic development site allocations

SA Objective		Indicative floorspace	SA1: Air pollution	SA2: Biodiversity			SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
Southern Rother and the Hastings Fringes																												
Guestling																												

GU1 - Land north of A265, Ivyhouse Lane, Hastings	2,500	+	-	0	0	-	0	+	0	+	+	0	+	0	+	+	0	0	-	0	--	0	N/A	--	0	+	+	N/A
Westfield																												
WS4 - Freshfields Farm, Westfield Lane, Westfield	3,500	0	-	0	0	0	0	0	0	+	+	0	0	+	+	0	0	0	-	0	--	0	N/A	--	0	+	0	N/A

SA of the Battle and Surrounding Settlements sites



6.86. The following section sets out the SA findings for the Battle and Surrounding Settlements sub-area site options, focussing on the preferred options (e.g. sites taken forward as proposed site allocations in the draft Local Plan, excluding those with planning permission and resolution to grant subject to legal agreement). This sub-area includes the parishes of Ashburnham, Brightling, Battle (which contains the town of Battle itself and the village of Netherfield), Catsfield, Dallington, Mountfield, Penhurst, Sedlescombe and Whatlington, although not all of these parishes contain sites for assessment. The scoring tables for the proposed site allocations are set out at the end of this sub-section, and scoring tables for the 'rejected' HELAA sites included at Appendix 4 of this report.

Ashburnham

6.87. Overall, the appraisal shows that there are predominantly neutral and negative scores associated with the submitted rejected site located in the parish of Ashburnham, leaning towards minor negative overall. Significant negative scores are identified in relation to the lack of services and accessibility available in the parish alongside the landscape impacts which accompany the remote location of the site, and the parish, within the High Weald National Landscape.

Main sustainability issues

6.88. The sustainability issues affecting the rejected site, located within the High Weald National Landscape, include major negative scores against indicators relating to development on greenfield land and landscape sensitivity. The site scored negatively in relation to biodiversity, flooding (surface water), heritage and agricultural land. The site scored positively in relation to access to Public Rights of Way, did not have groundwater flooding issues. The rejected site is in a 'not sustainable' location.

Suggested mitigation measures

6.89. While there are no proposed site allocations in Ashburnham parish, the following measures would be suggested to help avoid or mitigate negative impacts and improve overall sustainability of sites, should any rejected sites be brought forward:

- Landscape and visual impact assessment in relation to HWNL and local character.
- Requirements for the protection of biodiversity, with appropriate buffers between the built area and sensitive habitats, and BNG within the site.
- Site specific Flood Risk Assessment and the incorporation of SuDS in the development.
- Protection of heritage assets through assessment, careful design and separation.
- Measures to improve access to services and facilities.

Brightling

6.90. Overall, the appraisal shows that there are predominantly neutral and major negative scores associated with the submitted rejected site located in Brightling parish, leaning towards major negative overall. Significant negative scores are identified in

relation to the lack of services and accessibility available in the parish alongside the landscape impacts which accompany the remote location of the site, and the parish, within the High Weald National Landscape.

Main sustainability issues

6.91. The sustainability issues affecting the rejected site, located within the High Weald National Landscape, include major negative scores against indicators relating to biodiversity, flooding (surface water), greenfield land, and landscape sensitivity. The site scored positively in relation to access to Public Rights of Way, did not have groundwater flooding issues and had a neutral score for heritage and soil. The rejected site is in a 'not sustainable' location.

Suggested mitigation measures

6.92. The following measures are suggested to help avoid or mitigate negative impacts and improve the overall sustainability of the sites:

- Landscape and visual impact assessment in relation to HWNL and local character.
- Requirements for the protection of biodiversity, with appropriate buffers between the built area and sensitive habitats, and BNG within the site.
- Site specific Flood Risk Assessment and the incorporation of SuDS in the development.
- Measures to improve access to services and facilities.

Battle

6.93. There are a mix of positive, neutral and negative scores for proposed allocation sites in Battle, all of which are in the High Weald National Landscape. There are no significant positive effects, but some sites do have significant negative scores relating to risks of flooding (particularly surface water flooding),

biodiversity impacts, impacts on greenfield land and landscape sensitivity.

6.94. The pattern of scores for the rejected sites in this area, all of which are in the High Weald National Landscape, are similar to the proposed sites, with a mixture of positive, neutral and negative effects, no significant positive effects but some significant negative effects affecting some sites, particularly relating to impacts on biodiversity, flood risk (particularly surface water flooding), impacts on greenfield land and landscape sensitivity.

Main sustainability issues

6.95. The sustainability issues affecting the proposed allocated sites include, for some sites, biodiversity, flooding and heritage impacts, impacts on greenfield and agricultural land, and landscape sensitivity in the High Weald National Landscape. However, flooding constraints often affected only small parts of sites and heritage impacts were in relation to minor negative scores. Proposed allocated sites generally scored positively in relation to access to public open space and Public Rights of Way, they did not have groundwater flooding issues and scored positively on being in a sustainable location.

6.96. Sustainability issues identified for the rejected sites in this area include negative scores associated with biodiversity, flooding, heritage, impacts of developing greenfield and agricultural land, landscape sensitivity in the High Weald National Landscape. These sites generally scored positively on the appraisal in relation to access to public open space and Public Rights of Way, and they did not have groundwater flooding constraints. The majority of sites are located within, or in very close proximity to, the settlement of Battle, with those scoring major negative for service provision being within the parish of Battle, but not near the settlement of Battle.

Suggested mitigation measures

6.97. The following measures are suggested to help avoid or mitigate negative impacts and

improve overall sustainability of the sites in Battle:

- The protection of biodiversity features and inclusion of green infrastructure and land for BNG within sites, to help mitigate the loss of biodiversity, greenfield and agricultural land
- The protection of landscape features and inclusion of landscaping as part of development proposals
- The protection of the setting of heritage assets
- Measures to mitigate flood risks, particularly avoiding development in areas of sites which are at risk of flooding, and the inclusion of appropriate SuDS

Catsfield

6.98. There are a mix of positive, neutral and negative scores for proposed allocation sites in Catsfield, all of which are within or adjacent to the High Weald National Landscape. There are no significant positive effects, but some sites do have significant negative scores relating to risks of flooding (surface water flooding), impacts on greenfield land and landscape sensitivity.

6.99. The pattern of scores for the rejected sites in this area, all of which are in the High Weald National Landscape, are similar to the proposed sites, with a mixture of positive, neutral and negative effects, no significant positive effects but some significant negative effects affecting some sites, particularly relating to lack of service provision and impacts on biodiversity, flood risk (surface water flooding), greenfield land and landscape sensitivity.

Main sustainability issues

6.100. The sustainability issues affecting the proposed allocated sites include, for some sites, biodiversity, flooding (surface water), heritage, greenfield and agricultural land, service frequency and landscape sensitivity

in the High Weald National Landscape. Proposed allocated sites generally scored positively in relation to access to public open space and Public Rights of Way, and scored neutrally in terms of access to essential services.

6.101. Sustainability issues identified for the rejected sites in this area include negative scores associated with biodiversity, flooding, impacts of developing greenfield and agricultural land, landscape sensitivity in the High Weald National Landscape. These sites generally scored positively on the appraisal in relation to access to public open space and Public Rights of Way, and they did not have groundwater flooding constraints. Some of the sites are located near to the settlement of Catsfield and so have moderate access to essential services, with the remaining sites being located away from the settlement services in more remote areas of the parish.

Suggested mitigation measures

6.102. The following measures are suggested to help avoid or mitigate negative impacts and improve overall sustainability of the sites in Catsfield:

- The protection of biodiversity features and inclusion of green infrastructure and land for BNG within sites, to help mitigate the loss of biodiversity, greenfield and agricultural land.
- The protection of landscape features and inclusion of landscaping as part of development proposals.
- The protection of the setting of heritage assets.
- Measures to mitigate flood risks, particularly avoiding development in areas of sites which are at risk of flooding, and the inclusion of appropriate SuDS.

Dallington

6.103. Overall, the appraisal shows that there are a mix of positive, neutral and negative scores

associated with the submitted rejected site in Dallington, leaning towards minor negative overall. Significant negative scores are identified in relation to the lack of services and accessibility available in the parish alongside the landscape impacts which accompany the remote location of the site, and the parish, within the High Weald National Landscape.

Main sustainability issues

6.104. The sustainability issues affecting the rejected site, located within the High Weald National Landscape, include negative scores against indicators relating to biodiversity, heritage, greenfield and agricultural land, and landscape sensitivity. The site scored positively in relation to access to open space and Public Rights of Way, did not have groundwater flooding issues. The rejected site is in a 'low sustainable' location.

Suggested mitigation measures

6.105. Whilst there are no proposed site allocations in Dallington parish, the following measures would be suggested to help avoid or mitigate negative impacts and improve overall sustainability of sites, should any rejected sites be brought forward:

- Landscape and visual impact assessment in relation to HWNL and local character.
- Requirements for the protection of biodiversity, with appropriate buffers between the built area and sensitive habitats, and BNG within the site.
- Protection of heritage assets through assessment, careful design and separation.
- Measures to improve access to services and facilities.

Mountfield

6.106. Overall, the appraisal shows that there are a mix of positive, neutral and negative scores

associated with the submitted rejected site in Mountfield, leaning towards minor negative overall. Significant negative scores are identified in relation to flood risk, the lack of services and accessibility available in the parish alongside the landscape impacts which accompany the remote location of the site, and the parish, within the High Weald National Landscape.

Main sustainability issues

6.107. The sustainability issues affecting the rejected site, located within the High Weald National Landscape, include negative scores against indicators relating to flood risk, heritage, greenfield and agricultural land, and landscape sensitivity. The site scored positively in relation to access to open space and Public Rights of Way, did not have groundwater flooding issues but had a small area of the site in Flood Risk Zones 2 and 3 and at high risk of surface water flooding. The rejected site is in a 'low sustainable' location.

Suggested mitigation measures

6.108. Whilst there are no proposed site allocations in Mountfield parish, the following measures would be suggested to help avoid or mitigate negative impacts and improve overall sustainability of sites, should any rejected sites be brought forward:

- Landscape and visual impact assessment in relation to HWNL and local character.
- Site specific Flood Risk Assessment and the incorporation of SuDS in the development.
- Protection of heritage assets through assessment, careful design and separation.
- Measures to improve access to services and facilities.

Netherfield

6.109. There are a mix of positive, neutral and negative scores for the proposed allocation site in Netherfield, which is in the High Weald National Landscape. There are no significant positive effects, but the site does have a major negative score relating to development on greenfield land.

6.110. There are a mix of positive, neutral and negative scores for the rejected sites in this area, all of which are in the High Weald National Landscape. There are no significant positive effects but some significant negative effects affecting some sites, particularly relating to a lack of services and impacts on biodiversity, flood risk (surface water flooding) and landscape sensitivity.

Main sustainability issues

6.111. The sustainability issues affecting the proposed allocated site include landscape sensitivity in a High Weald National Landscape and the site being in a 'low sustainable' location. The site scored positively in relation to access to open space and had neutral scores relating to indicators associated with access to essential services, biodiversity, flood risk and heritage.

6.112. Sustainability issues identified for the rejected sites in this area include negative scores associated with biodiversity, flooding (surface water), heritage, impacts of developing greenfield and agricultural land and landscape sensitivity in the High Weald National Landscape. These sites generally scored positively in relation to access to public open space and Public Rights of Way, and they did not have groundwater flooding constraints. The rejected sites are in 'low sustainable' or 'not sustainable' locations.

Suggested mitigation measures

6.113. The following measures are suggested to help avoid or mitigate negative impacts and improve overall sustainability of the sites in Netherfield:

- The inclusion of green infrastructure and land for BNG within sites, to help mitigate the loss of biodiversity, greenfield and agricultural land
- The protection of landscape features and inclusion of landscaping as part of development proposals

Sedlescombe

6.114. There are a mix of positive, neutral and negative scores for the proposed allocation sites in Sedlescombe, all of which are in the High Weald National Landscape. There are no significant positive effects, but some of the sites do have major negative scores relating to flooding (surface water flooding), biodiversity and development on greenfield land.

6.115. The pattern of scores for the rejected sites in this area, all of which are in the High Weald National Landscape, are similar to the proposed sites, with a mixture of positive, neutral and negative effects, no significant positive effects but some significant negative effects affecting some sites, particularly relating to a lack of services and impacts on biodiversity, flood risk (surface water flooding), landscape sensitivity and development on greenfield land.

Main sustainability issues

6.116. The sustainability issues affecting the proposed allocated sites include, for some sites, biodiversity, heritage, greenfield and agricultural land and landscape sensitivity in the High Weald National Landscape. Proposed allocated sites generally scored positively in relation to access to public open space, Public Rights of Way and essential services, and scored neutrally in terms of flooding except for a couple of sites which have small, localised areas of surface water flood risk and did not have groundwater flooding issues.

6.117. Sustainability issues identified for the rejected sites in this area include negative scores associated with biodiversity, flooding

(surface water) impacts of developing greenfield and agricultural land and landscape sensitivity in the High Weald National Landscape. These sites generally scored positively on the appraisal in relation to access to public open space and Public Rights of Way, and they did not have groundwater flooding issues. All of the rejected sites are located some distance from the settlement of Sedlescombe and therefore have major negative scores associated with access to, and availability of, services.

Suggested mitigation measures

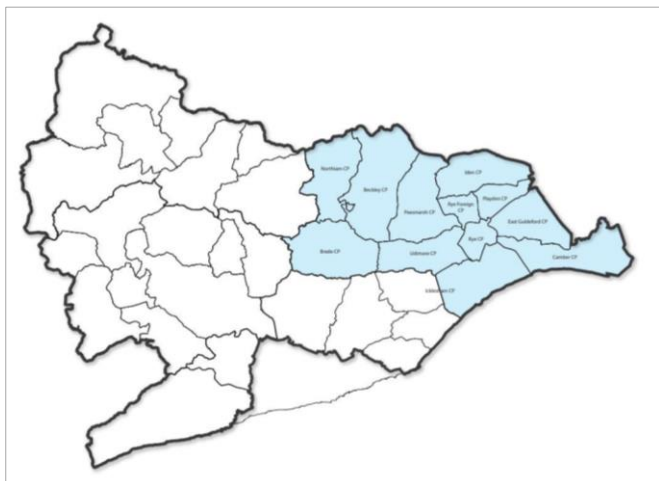
6.118. The following measures are suggested to help avoid or mitigate negative impacts and improve overall sustainability of the sites in Sedlescombe:

- The protection of biodiversity features and inclusion of green infrastructure and land for BNG within sites, to help mitigate the loss of biodiversity, greenfield and agricultural land.
- The protection of landscape features and inclusion of landscaping as part of development proposals.
- The protection of the setting of heritage assets .
- Measures to mitigate flood risks, particularly avoiding development in areas of sites which are at risk of flooding, and the inclusion of appropriate SuDS.

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
Battle and surrounding settlements																												
Battle																												
BT1 – Land south of Hastings Road	220	+	0	-	0	--	0	+	0	--	0	0	+	-	+	+	0	0	-	0	--	-	N/A	--	0	N/A	+	N/A
BT2 – Land at Breadsell	145	--	-	-	0	-	0	--	0	0	0	0	+	-	+	--	0	0	-	0	--	-	N/A	--	0	N/A	--	N/A
BT4 – Land at Caldbec House	5	+	0	0	0	0	0	+	0	0	0	0	+	+	+	+	0	-	N/A	0	--	0	N/A	-	0	N/A	+	N/A
BT6 – Land at Sunny Rise	10	+	0	-	0	-	0	+	0	0	0	0	+	-	-	+	-	-	0	0	--	0	N/A	--	0	N/A	+	N/A
BT7 – Land adjacent to 1 Loose Farm Cottages	5	+	0	0	0	0	0	+	0	0	0	0	+	-	-	+	0	0	-	0	--	0	N/A	-	0	N/A	+	N/A
BT8 – Land east of Coronation Gardens	75	+	0	0	0	-	0	+	0	--	0	0	+	+	+	+	0	0	-	0	--	-	N/A	--	0	N/A	+	N/A
BT9 – Land adjoining Little Brans	73	+	0	-	0	-	0	+	0	--	0	0	+	-	+	+	0	0	-	0	--	-	N/A	--	0	N/A	+	N/A
BT10 – Battle Market Square	52	+	0	0	0	0	0	+	0	-	0	0	+	+	+	+	-	-	N/A	0	--	+	N/A	++	-	0	+	N/A
Catsfield																												
CT1 – Land west of B2204	30	-	0	0	0	0	0	-	0	-	0	0	0	-	+	-	-	0	-	0	--	-	N/A	--	0	N/A	0	N/A
CT2 – Land south of Wilton House Equestrian Centre	20	-	-	0	0	0	0	-	0	-	0	0	0	-	+	-	-	0	-	0	--	-	N/A	--	0	N/A	0	N/A
CT3 – Land south of Church Road	35	-	-	-	0	-	0	-	0	--	0	0	0	+	+	-	-	0	-	0	-	N/A	-	--	0	N/A	0	N/A
Netherfield																												
NE1 – Swallow Barn	10	-	0	0	0	0	0	-	0	0	0	0	0	+	-	-	0	0	N/A	0	--	-	N/A	0	0	N/A	--	N/A
NE2 – White House Poultry Farm		Planning reference – RR/2023/164/P																										
Sedlescombe																												
SD1 – Land at Sunningdale		Planning reference – RR/2019/2485/P																										
SD2 – Land at Church Hill Farm	12	0	0	0	0	-	0	0	0	--	0	0	+	+	+	0	0	-	-	0	--	-	N/A	--	0	N/A	0	N/A
SD3 – Land at Sedlescombe Sawmills	8	--	0	-	0	--	0	--	0	0	0	0	--	-	+	--	0	-	N/A	0	--	0	N/A	+	--	0	--	N/A
SD4 – Land adjacent to St John the Baptist Church	17	0	0	0	0	0	0	0	0	0	0	0	+	+	-	0	0	-	-	0	--	0	N/A	--	0	N/A	0	N/A
SD5 – Land at Gate Cottage		Planning reference – RR/2023/1406/P																										
SD6 – Land at Church Hill Farm	10	0	0	0	0	0	0	0	0	0	0	0	+	+	+	0	0	-	-	0	--	0	N/A	--	0	N/A	0	N/A
SD9 – Land north of Gorselands	15	0	-	0	0	-	0	0	0	--	0	0	+	+	+	0	0	0	0	0	--	-	N/A	--	0	N/A	0	N/A
SD10 – Land north of Brede Lane	38	0	0	-	0	-	0	0	0	0	0	0	+	+	+	0	0	0	0	0	--	-	N/A	--	0	N/A	0	N/A

SA Objective		Indicative housing units	SA1: Air pollution	SA2: Biodiversity			SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
Battle and surrounding settlements																												
Battle																												
BT3 – Beech Farm	Planning reference – RR/2022/1765/P																											
BT5 – Rutherfords Business Park	2700	--	0	-	0	--	0	--	0	--	0	0	--	-	+	--	0	0	N/A	0	--	-	N/A	+	--	0	--	N/A
Brightling																												
BRI1 – Coldharbour Farm Estate	Planning reference – RR/2018/480/P																											
Sedlescombe																												
SD8 – Marley Lane Business Park	Planning reference – RR/2006/3467/P																											
SD9 – Land at Felon’s Field	3000	--	0	-	-	--	0	--	0	--	0	0	--	-	+	--	0	0	N/A	0	--	-	N/A	0	0	+	--	N/A

SA of the Rye and Eastern Settlements Cluster sites



6.119. The following section sets out the SA findings for the Rye and Eastern Settlements Cluster sub-area site options, focussing on the preferred options (e.g. sites taken forward as proposed site allocations in the draft Local Plan, excluding those with planning permission and resolution to grant subject to legal agreement). This sub-area includes the parishes of Beckley, Brede, Camber East, Guldeford, Icklesham (east), Iden, Northiam, Peasmarch, Playden, Rye, Rye Foreign and Udimore, although not all of these parishes include sites for assessment. The scoring tables for the proposed site allocations are set out at the end of this sub-section, and scoring tables for the 'rejected' HELAA sites included at Appendix 4 of this report.

Beckley

6.120. Overall, the appraisal suggests there are a mix of likely positive, neutral and negative effects of the sites in Beckley, however the assessments lean more towards neutral scores and minor negatives. Significant negative effects are only identified in relation to the High Weald National Landscape.

Main sustainability issues

6.121. The Settlement Study assesses the settlements within the parish as having overall low sustainability, reflected in the associated SA scores. The sites score well for

open space, due proximity to woodland, and PROWs, however the location of Beckley means that the submitted sites are on Grade 3 agricultural land giving a negative score. The location of the parish in the High Weald National Landscape results in significant negative scores for landscape sensitivity. The presence of nearby listed buildings to certain sites means some negative scores for heritage, but on balance the scores for these criteria are largely neutral. On flooding, the parish scores both neutral and minor positive, indicating clearly that this is not a local issue.

Suggested mitigation measures

6.122. The following measures are suggested to help avoid or mitigate negative impacts and improve overall sustainability of the sites in Beckley:

- Landscape and visual impact assessment in relation to HWNL and local character.
- On-site provision of outdoor amenity space, and/or contributions to public open space. Woodland provides the available outdoors space which may not be accessible for all.
- Explore opportunities to improve access to local services and public transport.

Brede

6.123. Overall, the appraisal suggests there are a mix of likely positive, neutral and negative effects of the sites in Brede parish, balanced mostly between neutrals and minor positives and negatives. Significant negative effects are only identified in relation to the High Weald National Landscape. The location of the parish within the NL gives the main significant negatives for the area.

Main sustainability issues

6.124. The Settlement Study assesses settlements within the parish as being potentially sustainability, reflected in the associated SA scores. Despite many neutral scores, the

sites score well for access to open space, and PROWs, however certain sites are located to ancient woodland or priority habitats, giving a negative score. The location of the parish in the High Weald National Landscape results in significant negative scores for landscape sensitivity. The parish scores neutrally for heritage. On flooding, the parish scores both neutral and minor positive, indicating clearly that this is not a local issue.

Suggested mitigation measures

6.125. The following measures are suggested to help avoid or mitigate negative impacts and improve overall sustainability of the sites in Brede parish:

- Landscape and visual impact assessment in relation to HWNL and local character.
- Explore opportunities to improve access to local services and public transport.
- Requirements for the protection of ancient woodland and buffer areas.

Camber

6.126. Overall, the appraisal suggests there are a mix of likely positive, neutral and negative effects of the sites in Camber, with a fairly even distribution between neutrals and minor positives and negatives. The only significant negatives identified indicate sites located within Flood Zone 3. A significant positive is the absence of impact these sites will have on the surrounding landscape.

Main sustainability issues

6.127. The sites score positively on all Health and Well-Being criteria with access to services, open space and PROWs all scoring minor positives. Minor negative areas are proximity to priority habitats for certain sites all sites being located on Grade 3 agricultural land. The settlement study scores settlements within the parish overall as moderately sustainable. On flooding, two sites are

located in Flood Zone 3, but mostly the flood risk gives neutral or positive scores.

Suggested mitigation measures

6.128. The following measures are suggested to help avoid or mitigate negative impacts and improve overall sustainability of the sites in Camber:

- Site specific Flood Risk Assessment and the incorporation of SuDS in the development.
- Requirements for the protection of priority habitats.

Icklesham (Rye Harbour)

6.129. Overall, the appraisal suggests there are a mix of likely positive, neutral and negative effects on the sites in Rye Harbour, with significant negatives relating to the single housing site allocation in terms of flood risk. Health and well-being criteria have a mix of neutral, and minor negative and positive scores with the negative relating to access to essential services.

Main sustainability issues

6.130. The single proposed allocated housing site in Rye Harbour indicates a neutral impact on all biodiversity criteria, with significant negative impacts regarding flood risk. An adjacent listed building gives a minor negative heritage impact, but the overriding score for the settlement is neutral. The settlement study scores the parish overall as being potentially sustainable.

Suggested mitigation measures

6.131. The following measures are suggested to help avoid or mitigate negative impacts and improve overall sustainability of the sites in Rye Harbour:

- Site specific Flood Risk Assessment and the incorporation of SuDS in the development.

- Explore opportunities to access essential local services.
- Heritage impact statement for the listed building.

Iden

6.132. Overall, the appraisal suggests there are a mix of likely positive, neutral and negative effects on the sites in Iden, with significant negatives relating to parish location within the National Landscape. Health and well-being criteria have a mix of neutral, and minor negative and positive scores, however access to services, heritage and quality of agricultural land all score negatively for the proposed allocated sites.

Main sustainability issues

6.133. The parish is located in the National Landscape and the significant negative scores for landscape sensitivity reflect this. Proximity to open space and PRoWs is generally good, with only a few negative scores. The biodiversity criteria are mostly scored as neutral. Flood risk is not an issue in the parish and scores neutrally and positively. The settlement study scores Iden overall as having low sustainability.

Suggested mitigation measures

6.134. The following measures are suggested to help avoid or mitigate negative impacts and improve overall sustainability of the sites in Iden:

- Landscape and visual impact assessment in relation to HWNL and local character.
- Explore opportunities to access essential local services.
- Improve opportunities to access to public transport.
- seek opportunities to make provision for shops or services in the parish area.

Northiam

6.135. Overall, the appraisal suggests there are a mix of likely positive, neutral and negative effects of the sites in Northiam. Significant negative effects are only identified in relation to the High Weald National Landscape. There is a significant positive assessment on access to essential services.

Main sustainability issues

6.136. Access to open space and PRoWs scores well throughout all Northiam sites and the biodiversity criteria are largely neutral with some minor negatives. On flooding, the parish scores both neutral and minor positives, indicating clearly that this is not a local issue. The settlement study scores the parish overall as moderately sustainable.

Suggested mitigation measures

6.137. The following measures are suggested to help avoid or mitigate negative impacts and improve overall sustainability of the sites in Northiam:

- Landscape and visual impact assessment in relation to HWNL and local character.
- Heritage impact statements for development in the proximity of listed buildings.

Peasmarsh

6.138. Overall, the appraisal suggests there are a mix of likely positive, neutral and negative effects of the sites in Peasmarsh. Significant negative effects are only identified in relation to the High Weald National Landscape. There is a significant positive assessment on access to essential services.

Main sustainability issues

6.139. Access to open space and PRoWs generally score well throughout the Peasmarsh sites. Biodiversity criteria are a mix of neutral and minor negative impacts with the minor

negatives relating to impacts on ancient woodland and priority habitats. On flooding, the parish scores both neutral and minor positives, indicating clearly that this is not a local issue. The sites score well in terms of access to open space, PROWs and essential services. The settlement study scores the parish overall as potentially sustainable.

Suggested mitigation measures

6.140. The following measures are suggested to help avoid or mitigate negative impacts and improve overall sustainability of the sites in Peasmarch:

- Landscape and visual impact assessment in relation to HWNL and local character.
- Explore opportunities to access essential local services.
- Requirements for the protection of ancient woodland and buffer areas.
- Requirements for the protection of priority habitat areas.
- Heritage impact statements for development in the proximity of listed buildings.
- Seek opportunities to make provision for shops or services in the parish area.

Playden

6.141. Overall, the appraisal suggests there are a mix of likely positive, neutral and negative effects of the sites in Playden with biodiversity criteria remaining neutral.

Main sustainability issues

6.142. The sites are not located in the National Landscape but have still been assessed as having a minor negative impact on the landscape. The biodiversity criteria have all neutral scores. There is surface water flooding risk on the proposed allocation sites. Health and well-being criteria are varied with

the sites being located in a moderately sustainable location but with negative access to open space and positive access to PROWs. There is some negative impact on listed buildings.

Suggested mitigation measures

6.143. The following measures are suggested to help avoid or mitigate negative impacts and improve overall sustainability of the sites in Playden:

- On-site provision of outdoor amenity space, and/or contributions to public open space.
- Site specific Flood Risk Assessment and the incorporation of SuDS in the development.
- Heritage impact statements for development in the proximity of listed buildings.

Rye

6.144. Overall, the appraisal suggests there are a mix of likely positive, neutral and negative effects of the sites in Rye, with significant positives scoring in the sustainability of the location, including access to services and transport links. Sites are mostly brownfield which scores a significant positive. Certain sites are located in Flood Zone 3, giving a significantly negative score.

Main sustainability issues

6.145. The scores are mostly neutral or positive with many scored as significant positives. Other than the sites in Flood Zone 3 the flood scores are mostly neutral or minor positive. Access to open space and PROWs are scored positively. The presence of listed buildings and archaeological notification areas give some minor positive scores for heritage impacts.

Suggested mitigation measures

6.146. The following measures are suggested to help avoid or mitigate negative impacts and improve overall sustainability of the sites in Rye:

- Site specific Flood Risk Assessment and the incorporation of SuDS in the development.
- Heritage impact statements for development in the proximity of listed buildings.

Rye Foreign

6.147. Overall, the appraisal suggests there are a mix of likely positive, neutral and negative effects of the site in Rye Foreign with the only significant negative effect resulting from the site's location within the HWNL

Main sustainability issues

6.148. The main sustainability issues relate to access to open space, archaeological impacts, impact on agricultural land and landscape impact in the HWNL.

Suggested mitigation measures

6.149. While there are no proposed site allocations in Rye Foreign parish, the following measures would be suggested to help avoid or mitigate negative impacts and improve overall sustainability of sites, should any rejected sites be brought forward:

- Landscape and visual impact assessment in relation to HWNL and local character.
- Protection of heritage assets through assessment, careful design and separation.
- Measures to improve access to open space.

Udimore

6.150. Overall, the appraisal suggests there are a mix of likely positive, neutral and negative effects of the sites in Udimore with significant negative scoring in the sustainability of the location, including access to services and transport links

Main sustainability issues

6.151. The main sustainability issues relate to the sustainability of the location and access to services and transport links, and also landscape sensitivity within the HWNL and impacts on greenfield land.

Suggested mitigation measures

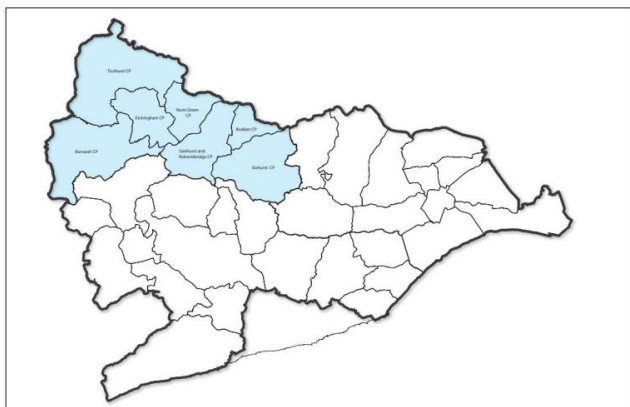
6.152. While there are no proposed site allocations in Udimore parish, the following measures would be suggested to help avoid or mitigate negative impacts and improve overall sustainability of sites, should any rejected sites be brought forward:

- Landscape and visual impact assessment in relation to HWNL and local character.
- Measures to improve access to services and facilities.

SA Objective		Indicative housing units	SA1: Air pollution	SA2: Biodiversity			SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
Rye and the eastern areas																												
Beckley																												
Land south and west of Buddens Green	20	-	0	0	0	0	0	-	0	0	+	0	-	+	+	-	-	0	-	0	--	-	N/A	--	0	N/A	0	N/A
Land East of Hobbs Lane, Beckley Four Oaks	20	-	0	0	0	0	0	-	0	0	+	0	-	+	+	-	0	0	-	0	--	-	N/A	--	0	N/A	0	N/A
Land west of Oaklea Cottages	13	-	0	0	0	0	0	-	0	+	+	0	-	+	+	-	-	0	-	0	--	-	N/A	--	0	N/A	0	N/A
Brede																												
Land west of A28, Northiam Rd	29	0	0	-	0	-	0	0	0	-	+	0	+	+	+	0	0	0	0	0	--	-	N/A	--	0	N/A	0	N/A
Land west of Tillingham View	70	0	0	-	0	-	0	0	0	0	0	0	+	+	+	0	0	0	0	0	--	-	N/A	0	0	N/A	0	N/A
Land at Broad Oak Lodge, Chitcombe Road	10	0	0	-	-	-	0	0	0	--	+	0	+	+	+	0	0	0	0	0	--	-	N/A	0	0	N/A	0	N/A
Camber																												
Land at the Former Putting Green Site, Old Lydd Road	10	+	-	0	0	-	0	+	0	0	0	0	+	+	+	+	0	0	-	0	0	N/A	-	++	0	N/A	+	N/A
Land at Central Car Park, Old Lydd Road		+	-	0	0	-	0	+	--	+	0	0	+	+	+	+	0	0	-	0	0	N/A	-	++	0	N/A	+	N/A
Lydd Road Garage, Lydd Road	5	+	-	0	0	0	0	+	--	0	-	0	+	+	+	+	0	0	-	0	0	N/A	0	++	0	N/A	+	N/A
Icklesham																												
Stoneworks Cottages, Rye Harbour	40	0	-	0	0	0	0	0	--	+	--	0	-	+	+	0	-	0	N/A	0	0	N/A	0	+	0	N/A	0	N/A
Iden																												
Land south of Elmsmead	15	-	0	0	0	0	0	-	0	+	+	0	0	-	+	-	-	-	-	0	--	-	N/A	--	0	N/A	0	N/A
Land at Street Field, Main Street	10	-	0	0	0	0	0	-	0	+	+	0	0	-	+	-	-	-	-	0	--	-	N/A	--	0	N/A	0	N/A
Northiam																												
Land south of Northiam Church of England Primary School, Northiam	7	+	0	0	-	0	0	+	0	+	+	0	++	-	+	+	-	-	-	0	--	0	N/A	--	0	N/A	0	N/A
Land south of Coppard Lane	15	+	0	-	0	0	0	+	0	0	0	0	++	-	+	+	0	0	-	0	--	-	N/A	--	0	N/A	0	N/A
Peasmarsh																												
Land south of Main Street	70	0	0	-	0	-	0	0	0	+	+	0	++	+	+	0	-	-	-	0	--	-	N/A	0	0	N/A	0	N/A
Land rear of Pippins	45	0	0	-	-	-	0	0	0	+	+	0	++	+	+	0	-	-	-	0	--	-	N/A	0	0	N/A	0	N/A
Tanyard, Main Street	15	0	0	-	0	-	0	0	0	+	+	0	++	+	+	0	-	-	-	0	--	-	N/A	--	0	N/A	0	N/A
Land East of Orchard Way	5	0	0	0	0	0	0	0	0	-	+	0	++	+	+	0	-	-	-	0	--	-	N/A	--	0	N/A	0	N/A
Land at Malthouse Business Park, The Maltings	6	0	0	-	0	-	0	0	0	+	+	0	++	+	+	0	0	0	-	0	--	-	N/A	++	--	0	0	N/A
Playden																												
Land South of Corner House	15	+	0	0	0	0	0	+	0	-	+	0	+	-	+	+	-	-	-	0	0	N/A	_	0	0	N/A	+	N/A
Land between Saltcote and The Steps	10	+	-	0	0	0	0	+	0	-	+	0	+	-	+	+	-	-	N/A Urban	0	0	N/A	-	--	0	N/A	+	N/A

SA Objective		Indicative floorspace	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference			1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
Rye and the eastern areas																													
Camber																													
CAM0002 - Land at the Central Car Park, Old Lydd Road, Camber			+	-	0	0	-	0	+	--	+	0	0	+	+	+	+	0	0	-	0	0	N/A	-	++	0	N/A	+	N/A
Icklesham																													
ICK0051 - Employment Land, Harbour Road			0	0	0	0	0	0	0	--	+	+	0	-	-	+	0	0	0	0	0	0	N/A	0	++	--	0	0	N/A

SA of the Northern Rother sites



6.153. The following section sets out the SA findings for the Northern Rother sub-area site options, focussing on the preferred options (e.g. sites taken forward as proposed site allocations in the draft Local Plan, excluding those with planning permission and resolution to grant subject to legal agreement). This sub-area includes the parishes of Bodiam, Burwash, Etchingham, Ewhurst, Hurst Green, Salehurst and Robertsbridge and Ticehurst, although not all of these parishes include sites for assessment. The scoring tables for the proposed site allocations are set out at the end of this sub-section, and scoring tables for the 'rejected' HELAA sites included at Appendix 4 of this report.

Burwash & Burwash Common

6.154. Overall, the appraisal suggests there are a mix of likely positive, neutral and negative effects of the sites in Burwash parish. There are some significant negative effects identified in relation to biodiversity, landscape and flood risk.

Main sustainability issues

6.155. The main sustainability issues identified relate to the presence of ancient woodland or priority habitats adjacent to some sites, the use of greenfield and Grade 3 agricultural land for new development, and surface water flood risk. There are also some issues in relation to access to services, in particular for Burwash Common. The site allocations are

located in the High Weald National Landscape.

6.156. Sites generally scored positive on the appraisal in relation to access to open space as well as Public Rights of Way, and they are not significantly constrained by the presence of heritage assets.

Suggested mitigation measures

6.157. The following measures are suggested to help avoid or mitigate negative impacts and improve overall sustainability of the sites in Burwash parish:

- Landscape and visual impact assessment in relation to National Landscape and local character.
- Requirements for the protection of ancient woodland and habitats sites, with appropriate buffers between the built area.
- Explore opportunities for on-site biodiversity net gain, including woodland and habitat sites.
- Site specific Flood Risk Assessment and the incorporation of SuDS in the development.
- Explore opportunities to improve access to local services.

Etchingham

6.158. Overall, the appraisal indicates that there are a mix of likely positive, neutral and negative effects of the sites in Etchingham. There are some significant negative effects identified in relation to biodiversity, landscape and flood risk.

Main sustainability issues

6.159. The main sustainability issues identified relate to the presence of Flood Zone 2 & 3 and surface water flood risk, the use of greenfield and some Grade 3 agricultural land for new development. The proposed site allocations

are located in the High Weald National Landscape, and one site in its entirety is considered to have a high landscape sensitivity while also containing priority habitat, while the other site is partly within Flood Zones 2 and 3.

6.160. Etchingham sites generally scored positive on the appraisal in relation to the settlement's overall sustainability, including access to public transport, as well as access to open space and Public Rights of Way. Sites are not significantly constrained by the presence of heritage assets.

Suggested mitigation measures

6.161. The following measures are suggested to help avoid or mitigate negative impacts and improve overall sustainability of the sites in Etchingham:

- Landscape and visual impact assessment in relation to the National Landscape and local character.
- Requirements for habitats sites, with appropriate buffers between the built area.
- Explore opportunities for on-site biodiversity net gain, including woodland and habitat sites.
- Site specific Flood Risk Assessment and the incorporation of SuDS in the development.

Hurst Green

6.162. Overall, the appraisal suggests there are a mix of likely positive, neutral and negative effects of the sites in Hurst Green parish. There are some significant negative effects identified in relation to biodiversity, landscape impacts, flood risk and health and wellbeing.

Main sustainability issues

6.163. The main sustainability issues identified relate to the presence of priority habitat within some sites, the use of greenfield and

Grade 3 agricultural land for new development, and surface water flood risk. There are also some issues in relation to access to essential services where sites are located outside the village. The site allocations are located in the High Weald National Landscape.

6.164. Sites generally scored positive on the appraisal in relation to access to public transport, as well as access to open space and Public Rights of Way. Sites do not appear to be constrained by the presence of heritage assets.

Suggested mitigation measures

6.165. The following measures are suggested to help avoid or mitigate negative impacts and improve overall sustainability of the sites in Hurst Green:

- Landscape and visual impact assessment in relation to the National Landscape and local character.
- Requirements for the protection of ancient woodland and habitats sites, with appropriate buffers between the built area.
- Explore opportunities for on-site biodiversity net gain.
- Site specific Flood Risk Assessment and the incorporation of SuDS in the development.
- Explore opportunities to make provision for shops or services in Hurst Green.

Robertsbridge and the wider Salehurst Parish

6.166. Overall, the appraisal suggests there are a mix of likely positive, neutral and negative effects of the sites in Salehurst and Robertsbridge parish. There are some significant negative effects identified in relation to biodiversity, landscape sensitivity, flood risk, heritage assets. Significant negative scores in relation

to access to services also feature in the wider parish.

Main sustainability issues

6.167. The main sustainability issues identified relate to the presence Flood Zones 2 and 3 and surface water flood risk, of priority habitats on some sites, and the use of greenfield and Grade 3 agricultural land for new development. All sites are located in the High Weald National Landscape, and some sites form landscape of a high sensitivity. There are instances where sites contain or are adjacent to listed buildings, a Conservation Area, and an archaeological notification area. There are also some issues in relation to access to services and public transport where sites are located outside of the village.

6.168. Sites, including all allocated sites, generally scored positive on the appraisal in relation to settlement sustainability, including access to public transport. There are also general positive scores for access to open space as well as Public Rights of Way.

Suggested mitigation measures

6.169. The following measures are suggested to help avoid or mitigate negative impacts and improve overall sustainability of the sites in Salehurst and Robertsbridge parish:

- Landscape and visual impact assessment in relation to HWNL and local character.
- Requirements for the protection of habitats sites, with appropriate buffers between the built area.
- Explore opportunities for on-site biodiversity net gain.
- Site specific Flood Risk Assessment and the incorporation of SuDS in the development.
- Requirement for archaeological assessments and a Heritage Impact

Assessment to be undertaken, at the application stage.

Staplecross and the wider Ewhurst Parish

6.170. Overall, the appraisal indicates a mix of likely positive, neutral and negative effects of the sites in Ewhurst parish. There are some significant negative effects identified in relation to flood risk and heritage.

Main sustainability issues

6.171. The main sustainability issues identified relate to the use of greenfield and Grade 3 agricultural land for new development, and surface water flood risk. The site allocations are located in the High Weald National Landscape. One site allocation is adjacent to a listed building, and one rejected site contains a listed building. Other rejected sites are within an Archaeological Notification Area. There are also some issues in relation to access to services for sites outside of Staplecross, while the sites within Staplecross, despite the primary school in the village, lack positive scores for overall settlement sustainability.

6.172. Sites generally scored positive on the appraisal in relation to access to open space as well as Public Rights of Way, and they are not significantly constrained by biodiversity.

Suggested mitigation measures

6.173. The following measures are suggested to help avoid or mitigate negative impacts and improve overall sustainability of the sites in Ewhurst parish:

- Landscape and visual impact assessment in relation to HWNL and local character.
- Site specific Flood Risk Assessment and the incorporation of SuDS in the development.
- Explore opportunities to improve access to local services.

- Heritage Impact Statement in the proximity of heritage assets.

Flimwell

6.174. Overall, the appraisal suggests there are a mix of likely positive, neutral and negative effects of the sites in Flimwell. There are some significant negative effects identified in relation to biodiversity, access to services and flood risk.

Main sustainability issues

6.175. The main sustainability issues identified relate to the presence of ancient woodland, adjacent to sites, or priority habitats within some sites, the use of greenfield and Grade 3 agricultural land for new development, and surface water flood risk. There are also some issues in relation to access to services in the settlement. The site allocations are located in the High Weald National Landscape.

6.176. Sites generally scored positive on the appraisal in relation to access to public transport, access to open space as well as Public Rights of Way. Sites proposed for allocation are not constrained by the presence of heritage assets or significant landscape sensitivity.

Suggested mitigation measures

6.177. The following measures are suggested to help avoid or mitigate negative impacts and improve overall sustainability of the sites in Flimwell:

- Landscape and visual impact assessment in relation to HWNL and local character.
- Requirements for the protection of ancient woodland and habitats sites, with appropriate buffers between the built area.
- Explore opportunities for on-site biodiversity net gain.

- Site specific Flood Risk Assessment and the incorporation of SuDS in the development.

- Explore opportunities to improve access to local services.

Ticehurst and wider parish area (excluding Flimwell and Stonegate)

6.178. Overall, the appraisal shows there are a mix of likely positive, neutral and negative effects of the sites in Ticehurst. There are some significant negative effects identified in relation to flood risk.

Main sustainability issues

6.179. The main sustainability issues identified relate to the use of greenfield and Grade 3 agricultural land for new development, and surface water flood risk. The site allocations are located in the High Weald National Landscape. There are also some negative scores for priority habitat where adjacent or within the site. Sites proposed for allocation score a minor negative in relation to heritage assets where listed buildings are adjacent, while one site contains an area of ancient woodland.

6.180. Sites within the village scored positively on the appraisal in relation to settlement sustainability, both in relation to access to services and access to public transport, as well as access to open space Public Rights of Way.

Suggested mitigation measures

6.181. The following measures are suggested to help avoid or mitigate negative impacts and improve overall sustainability of the sites in Ticehurst:

- Landscape and visual impact assessment in relation to HWNL and local character.
- Requirements for the protection of habitats sites and ancient woodland, with

appropriate buffers between the built area.

- Site specific Flood Risk Assessment and the incorporation of SuDS in the development.
- The requirement for site layouts to take account of adjacent heritage assets.

Stonegate

Overall, the appraisal suggests there are a mix of likely positive, neutral and negative effects of the sites in Stonegate. There are some significant negative effects identified in relation to services provision and biodiversity.

Main sustainability issues

6.182. The main sustainability issues identified relate to the lack of services within the settlement. A significant negative was scored due to the presence of TPOs along a site boundary. The use of greenfield and Grade 3 agricultural land for new development, and surface water flood risk are also issues. One site is also within a source protection zone. The site allocations are located in the High Weald National Landscape.

6.183. Sites generally scored positive on the appraisal in relation to access to open space as well as Public Rights of Way, and they are not significantly constrained by the presence of heritage assets. Sites also score positively for access to public transport due to the proximity of Stonegate train station.

Suggested mitigation measures

6.184. The following measures are suggested to help avoid or mitigate negative impacts and improve overall sustainability of the sites in Stonegate:

- Landscape and visual impact assessment in relation to National Landscape and local character.
- Requirements for the protection of TPOs, with appropriate buffers between the built area.

- Site specific Flood Risk Assessment and the incorporation of SuDS in the development.
- Explore opportunities to improve access to local services, seeking opportunities to make provision for shops or services in the settlement.
- Requirements that planning applications take account of the presence of source protection zone.

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
Northern Rother																												
Burwash																												
Land north of Shrub Lane, Burwash	35	0	0	-	0	-	0	0	0	--	+	0	+	+	+	0	0	0	-	0	--	-	N/A	--	0	N/A	0	N/A
Land at 101 Shrub Lane, Burwash	6	0	0	0	0	0	0	0	0	-	+	0	+	+	+	0	-	0	-	0	--	0	N/A	--	0	N/A	0	N/A
Land east of Shrub Lane (north), Burwash	15	0	0	0	0	0	0	0	0	-	+	0	+	+	+	0	0	0	-	0	--	-	N/A	--	0	N/A	0	N/A
Land east of Shrub Lane (south), Burwash	8	0	0	0	0	0	0	0	0	0	+	0	+	+	+	0	0	0	-	0	--	-	N/A	--	0	N/A	0	N/A
Burwash Common																												
Land south of Heathfield Road, Burwash Common	7	-	0	0	0	0	0	-	0	-	+	0	-	+	+	-	0	0	0	0	--	-	N/A	--	0	N/A	0	N/A
Old Orchard Nursery, Heathfield Road, Burwash Common	9	-	0	0	0	0	0	-	0	+	+	0	-	+	+	-	0	0	0	0	--	0	N/A	0	0	N/A	0	N/A
Etchingham																												
Land at Oxenbridge Lane, Etchingham	10	+	0	0	0	0	0	+	--	-	+	0	0	+	+	+	0	0	-	0	--	-	N/A	--	0	N/A	+	N/A
Croft Field	30	+	0	0	0	--	0	+	0	0	+	0	0	-	+	+	0	0	-	0	--	--	N/A	--	0	N/A	+	N/A
Hurst Green																												
Land south of Iridge Place, London Road, Hurst Green	RR/2022/1526/P (28 dwellings and public open space)																											
Land to Rear of The Olde Bakery, London Rd, Hurst Green	25	0	0	0	0	-	0	0	0	--	+	0	-	+	+	0	-	0	-	0	--	0	N/A	--	0	N/A	+	N/A
Land at The Lodge, London Road, Hurst Green	150	0	0	-	0	--	0	0	0	--	+	0	-	+	+	0	-	0	-	0	--	-	N/A	-	0	N/A	+	N/A
Robertsbridge																												
Land south of Heathfield Gardens, Robertsbridge	55	+	0	0	0	0	0	+	0	--	+	0	+	+	+	+	0	0	-	-	--	-	N/A	--	0	N/A	+	N/A
Grove Farm, Robertsbridge	96	+	0	0	0	0	0	+	0	+	+	0	+	+	+	+	--	-	-	-	--	-	N/A	-	0	N/A	+	N/A
Vicarage Land, Land south of the western end of Fair Lane, Robertsbridge	10	+	0	0	0	0	0	+	0	+	+	0	+	+	+	+	-	-	-	-	--	0	N/A	0	0	N/A	+	N/A
Culverwells, Land north of Station Road, Robertsbridge	RR/2023/27/P & RR/2025/1069/P (21 dwellings and doctors surgery)																											
Hodson's Mill, Northbridge Street, Robertsbridge	125	+	0	0	0	--	0	+	--	--	+	0	+	+	+	+	--	-	-	0	--	--	N/A	+	0	0	+	N/A
Staplecross																												
Land east of Stockwood Meadow, Northiam Road, Staplecross	25	0	0	0	0	0	0	0	0	--	+	0	0	+	+	0	0	0	-	0	--	-	N/A	--	0	N/A	0	N/A
Land east of Hop Gardens, Northiam Road, Staplecross	10	0	0	0	0	0	0	0	0	+	+	0	0	+	+	0	-	0	-	0	--	-	N/A	--	0	N/A	0	N/A
Flimwell (and nearby countryside)																												
Land rear of Fruitfields, High Street, Flimwell	27	0	0	-	0	--	0	0	0	--	+	0	--	+	+	0	0	0	-	0	--	-	N/A	--	0	N/A	+	N/A
North of Hawkhurst Road, Flimwell	35	0	0	-	0	0	0	0	0	+	+	0	--	+	+	0	-	0	+	0	--	0	n/A	--	-	N/A	+	N/A
Ticehurst																												
Land at Steellands Farm, Field Rise, Ticehurst	42	+	0	0	0	0	0	+	0	0	+	0	+	+	+	+	-	0	-	0	--	-	N/A	--	-	N/A	+	N/A
Orchard Farm, Ticehurst Village	5	+	0	0	0	-	0	+	0	--	+	0	+	+	+	+	0	0	-	0	--	0	N/A	--	0	N/A	+	N/A

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
Stonegate																												
Land at Lymden Lane, Stonegate	5	-	0	0	0	0	0	-	0	+	+	0	--	+	+	-	0	0	-	0	--	-	N/A	--	0	N/A	+	N/A
Land east of Bardown Road, Stonegate	20	-	0	0	--	0	0	-	0	+	+	0	--	+	+	-	0	0	-	-	--	-	N/A	--	0	N/A	+	N/A

Northern Rother – economic development

SA Objective	Indicative economic floorspace	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
Northern Rother																												
Flimwell (including nearby countryside)																												
Land south of Hawkhurst Road, Flimwell	1,800	0	0	-	0	-	0	0	0	+	+	0	--	+	+	0	0	0	+	0	--	0	N/A	--	0	N/A	+	N/A
Cedar Farm, London Road	2,400	--	0	--	0	--	0	--	0	--	+	0	--	-	+	--	0	0	-	0	--	0	N/A	-	-	0	0	N/A

SA of the gypsy, traveller and travelling showpeople accommodation sites

6.185. The following section sets out the SA findings for the gypsy, traveller and travelling showpeople site options, focussing on the preferred options. The scoring tables for the proposed site allocations and rejected sites are set out at the end of this sub-section. The findings of this section should be distinguished from considerations for the spatial approach to meeting the needs of this group, as set out Chapter 4 of this report, which deals with the Development Strategy. Furthermore, unlike other allocations for proposed development, this section does not contain geographic sub-areas.

Findings for the district

6.186. Overall, the appraisal suggests there are a mix of likely positive, neutral and negative effects of the sites. There are some significant negative effects identified in relation to access to services and public transport, as well as for biodiversity, landscape and flood risk.

Main sustainability issues

6.187. The main sustainability issues identified relate to access essential services and public transport, due to the fact that gypsy and traveller sites are often located outside of settlements. There are also some issues in relation to priority habitats within some sites, and ancient woodland being adjacent. Surface water flooding is occasionally an issue. The site allocations are located in the High Weald National Landscape, where landscape sensitive is an issue.

6.188. At the same time some sites score positively against impacts on parks and countryside where they include brownfield areas and are well screened from the wider landscape. Sites generally scored positive on the appraisal in relation to access to open space as well as Public Rights of Way, and they are

not significantly constrained by the presence of heritage assets.

Suggested mitigation measures

6.189. The following measures are suggested to help avoid or mitigate negative impacts and improve overall sustainability of the sites:

- Landscape and visual impact assessment in relation to HWNL and local character.
- Requirements for the protection of ancient woodland and habitats sites, with appropriate buffers between the built area.
- Explore opportunities for on-site biodiversity net gain, including ancient woodland and habitat sites.
- Site specific Flood Risk Assessment and the incorporation of SuDS in the development.
- Explore opportunities to improve access to local services.

Reasonable alternative site considerations

6.190. While the SA Interim Report to support the 2024 Regulation 18 consultation noted that reasonable alternatives to identified gypsy and traveller sites would include those sites in existing temporary use for that purpose, suitable sites adjacent to existing permanent sites and other sites with an accepted willing landowner could be explored; since that time, further site assessment work has been undertaken, including the identification of additional sites. This has resulted in a suite of sites that are now proposed as allocations, together with additional sites that have been submitted through the Call for Sites (and are consequently understood to be available) but have been assessed as unsuitable through the site assessment process.

6.191. Therefore, in the same way as the HELAA sites SA, these “rejected, submitted” sites are

considered to be the “reasonable alternatives” which have been subject to SA, as detailed in the tables below. The approach suggested in the 2024 SA Interim Report has not been abandoned, however, as sites in temporary use, suitable sites adjacent to existing sites, and other sites with a willing landowner are all included within the suite of sites that have been assessed.

SA Objective		Indicative housing units	SA1: Air pollution	SA2: Biodiversity			SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
Gypsy and Traveller Sites – Proposed Allocations																												
GYP1 – Land adjacent to High Views, Loose Farm Lane, Battle		+	-	0	0	0	0	+	0	0	+	N/A	+	+	+	+	0	0	-	0	-	+	N/A	++	0	N/A	+	N/A
GYP2 – Land south of Hastings Road, Battle		+	-	0	0	0	0	+	0	0	+	N/A	+	+	+	+	0	0	-	0	-	+	N/A	++	0	N/A	+	N/A
GYP3 – Land adjacent to Fir Tree Cottage, Netherfield Hill, Battle		--	-	-	0	-	0	--	0	--	+	N/A	--	-	+	--	0	0	-	0	--	0	N/A	+	0	N/A	--	N/A
GYP4 – Land south of Redlands Lane, Salehurst		+	-	0	0	--	0	+	0	--	0	N/A	+	+	+	--	0	0	-	0	--	0	N/A	0	0	N/A	+	N/A
GYP5 – Land adjacent to Valentine Ridge, A2100, Mountfield		--	-	-	0	-	0	--	0	0	+	N/A	--	+	+	--	0	0	-	0	--	0	N/A	0	0	N/A	--	N/A

SA of the Area-based Policies

6.192. The Regulation 19 Local Plan includes 9 ‘area-based’ policies which are specific to the Local Plan sub-areas. There are 4 policies which are proposed to be ‘saved’ and/or updated from the previous Local Plan and have therefore been subject to SA. However, in the interests of completeness, all of the proposed area-based policies have been subject to SA using the latest SA Framework. Further details on the area-based policies are set out below.

6.193. The Council does not, that there are reasonable alternatives for these policies, as they will help give effect to the Development Strategy and alternatives would have therefore been considered more widely as part of its SA, apart from proposed Policy BX1 for the Bexhill Urban Area. In this case, the reasonable alternatives were assessed as part of the ‘residential density options’, set out earlier in this report.

Figure 33: Area-based policies

Policy reference	Title	Sub-area
BX1	Bexhill Urban Area	Bexhill
BX2	Bexhill Cultural Area	Bexhill
BX3	London Road- Sackville Road Enhancement Area	Bexhill
BX4	Beeching Road Enhancement Area	Bexhill
BX18	West Bexhill Growth Area -Infrastructure Policy	Bexhill
BX29	North Bexhill Growth Area -Infrastructure Policy	Bexhill
BX30	Land south of Haven Brook Avenue - Infrastructure	Bexhill
GU6	Rock Lane Urban Fringe Management Area	Southern Rother & Hastings Fringes
RH2	Employment Land, Harbour Road	Rye

Figure 34: Assessment of Area-based Policies

Area-based policies	Description																					Score	Summary
		1 Air pollution	2 Biodiversity	3 Climate Change	4 Water Consumption	5 Flooding	6 Coastal Erosion	7 Health and Well-being	8 Housing	9 Accessibility to services	10 Safe Environments	11 Historic Environment	12 Pollution	13 Waste and Recycling	14 Water Pollution	15 Natural Landscape	16 Economic Performance	17 Employment Levels	18 Deprivation	19 Skills and Education	20 Transport		
BX1 – Bexhill Urban Area	This policy defines an urban area of Bexhill which is deemed to be within a reasonable walking distance to Bexhill railway station and Bexhill Town Centre. It sets additional policy requirements for new development, including on density requirements of new residential development.	+	+	++	0	+	0	+	++	++	0	+	+	0	0	0	0	+	0	0	++	15	This policy seeks to increase the number of residences within the urban area of Bexhill with high quality, higher density development that is accessible to existing public transport. This therefore positively meets many of the SA objectives that seek to encourage sustainable travel as well as encouraging a diversity of housing types. The policy also seeks that larger scale development incorporates a mix of uses which addresses objectives around access to services and employment opportunities. The policy cross-references other draft Local Plan policies on the historic environment.
BX2 – Bexhill Cultural Area	This policy designates a “cultural area” to afford the opportunity to focus the enhancement of the activity and facilities offer to improve patronage and the evening economy around the seafront as a significant amenity asset to the town.	0	0	0	0	0	0	+	0	+	0	++	0	0	0	+	++	+	0	0	0	8	This policy has a specific focus on seeking to improve arts, cultural and tourism activity in and around Bexhill seafront and the De La Warr Pavilion. Therefore, the benefits of this policy from when assessed against the SA Framework relate to the increased access and diversity of cultural heritage and the diversity of employment opportunities that would arise from new development supported by this policy. It is though neutral on many aspects.
BX3 – London Road-Sackville Road Enhancement Area	This policy identifies shortcomings in the appearance and operation of London Road, Buckhurst Place and Sackville Road as a gateway to the town, seafront and the De La Warr Pavilion.	0	0	+	0	0	0	+	+	++	0	0	0	0	0	0	++	+	0	0	+	9	This policy looks to enhance the townscape, public realm and living conditions. Therefore, the policy scores positively against the SA Framework on housing, employment and public realm related objectives but is neutral on many aspects.
BX4 – Beeching Road Enhancement Area	This policy supports delivery of the Bexhill-on-Sea Place Plan, including exemplar projects for creative workspace activation, public realm improvements, and employment intensification.	0	0	+	0	0	0	+	0	++	0	0	+	0	0	0	++	++	0	0	+	10	The policy primarily seeks to improve the employment and community uses within the Beeching Road area of Bexhill. The positive results from the SA Framework therefore are linked with these improvements, particularly as the Enhancement Area is brownfield land in

Area-based policies	Description	1 Air pollution	2 Biodiversity	3 Climate Change	4 Water Consumption	5 Flooding	6 Coastal Erosion	7 Health and Well-being	8 Housing	9 Accessibility to services	10 Safe Environments	11 Historic Environment	12 Pollution	13 Waste and Recycling	14 Water Pollution	15 Natural Landscape	16 Economic Performance	17 Employment Levels	18 Deprivation	19 Skills and Education	20 Transport	Score	Summary
																							a sustainable location of Bexhill. It is though neutral on many aspects.
BX18 – West Bexhill Growth Area - Infrastructure Policy	This policy requires that new development within the West Bexhill Growth Area will be coordinated through a master-planning approach. Proposals must appropriately contribute to the infrastructure required to create a sustainable community.	0	+	+	0	+	0	++	0	++	0	0	0	0	+	++	+	0	+	+	++	15	The policy sets out a range of infrastructure requirements to support the housing allocations proposed in the wider West Bexhill area. The policy criteria include a focus on active travel, green and blue infrastructure and the provision of a new GP and primary school (with nursery provision). As such, there are many positive aspects when assessed against the SA Framework.
BX29 – North Bexhill Growth Area - Infrastructure Policy	This policy requires that new development within the North Bexhill Growth Area will be coordinated through a master-planning approach. Proposals must appropriately contribute to the infrastructure required to create a sustainable community.	0	+	+	0	+	0	++	0	++	0	0	0	0	+	++	+	0	+	+	++	15	The policy sets out a range of infrastructure requirements to support the housing allocations proposed in the wider North Bexhill area. The policy criteria include a focus on active travel, green and blue infrastructure and the provision of new medical facilities and primary school (with nursery provision). As such, there are many positive aspects when assessed against the SA Framework.
BX30 – Land south of Haven Brook Avenue - Infrastructure	This policy augments policy BX29 by requiring specific infrastructure requirements on four adjacent proposed allocations in North Bexhill.	0	+	+	0	+	0	+	0	+	0	0	0	0	+	++	0	0	0	0	+	9	This policy covers certain sites within the wider North Bexhill Growth Area and the specific infrastructure requirements that are sought on these sites, for example playing pitches and a green corridor. This policy acts alongside proposed policy BX29 and therefore scores relatively lower against the SA Framework due to this targeted focus but still contains a number of positive benefits.
GU6 – Rock Lane Urban Fringe Management Area	The Rock Lane Urban Fringe Management Area is on the boundary with Hastings to facilitate the creation of an area of multifunctional green space as a buffer between town and countryside.	0	++	0	0	+	0	+	0	+	0	0	0	0	+	++	0	0	0	0	+	9	The policy sets out criteria where landscape management proposals would be supported to improve green infrastructure and access to the countryside and therefore the policy scores positively on these related objectives. It also restricts development that would harm the openness of the countryside. It is though neutral on many aspects.

Area-based policies	Description	1 Air pollution	2 Biodiversity	3 Climate Change	4 Water Consumption	5 Flooding	6 Coastal Erosion	7 Health and Well-being	8 Housing	9 Accessibility to services	10 Safe Environments	11 Historic Environment	12 Pollution	13 Waste and Recycling	14 Water Pollution	15 Natural Landscape	16 Economic Performance	17 Employment Levels	18 Deprivation	19 Skills and Education	20 Transport	Score	Summary
RH2 – Employment Land Harbour Road, Rye	The policy sets out land-use principles and criteria-based policies for the Rye Harbour Employment Area.	O	++	O	O	+	O	+	O	+	+	O	+	O	+	O	++	+	O	O	+	12	The policy provides additional protection for the employment area as a key location for industrial and commercial uses and will help to meet identified needs in this respect. It also includes site specific criteria to ensure that there is no adverse on the environment, including protected habitats sites and pollution. Controls on HGV movements will provide additional positive effects on pollution and amenity in the local area. There are also benefits in terms of flood risk management.

Figure 35: Summary of Assessment of Area-based Policies

Area-based policies	Score	1. Does this have a significant effect on the SA objective(s), whether positive or negative? State Y/N	2. Is the likely Impact? Negative (-1)	2. Is the likely Impact? Neutral (0)	2. Is the likely Impact? Positive (1)	3. Is this a temporary or permanent Impact? State T or P	4. Is this a short term or long term impact? State ST or LT	5. Are there synergies between other policies (or options) which might amplify the effect? State Y or N	6. Commentary/Notes Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score
BX1 – Bexhill Urban Area	15	Y			Y	P	LT	Y	This policy mainly looks to focus development within the urban area of Bexhill with its existing range of services and public transport options. Therefore, new development in this area will have positive, long term, permanent impact on this area of Bexhill. Improvements to pedestrian and cycle infrastructure will further create positive longer-term improvements. No negative impacts have been identified. This policy has synergies with policies HER1, LWL1, and BX4 as these have direct relevance to areas within this policy and have been referenced within this proposed policy.
BX2 – Bexhill Cultural Area	8	Y			Y	P	LT	Y	This policy seeks to improve the cultural and tourism offer in Bexhill as well as improving the promenade and public realm. No negative impacts have been identified. These improvements are therefore longer term for when the appropriate development proposals come forward. Some improvements to the public realm could occur in the shorter term too. Synergies with other policies include other tourism related policies, for example.

Area-based policies	Score	1. Does this have a <u>significant</u> effect on the SA objective(s), whether positive or negative? State Y/N	2. Is the likely Impact? Negative (-1)	2. Is the likely Impact? Neutral (0)	2. Is the likely Impact? Positive (1)	3. Is this a temporary or permanent Impact? State T or P	4. Is this a short term or long term impact? State ST or LT	5. Are there synergies between other <u>policies</u> (or options) which might amplify the effect? State Y or N	6. Commentary/Notes Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score
BX3 – London Road- Sackville Road Enhancement Area	9	Y			Y	P	LT	Y	This policy aspires to improve the public realm, commercial environment and living conditions of those who live, work and visit the parts of Bexhill within the policy area. Therefore, these improvements could occur in the short and long term but will have a longer term and permanent impact. No negative impacts have been identified. Policies previously consulted on in relation to public realm and active travel as well as supporting new employment development have synergies with this policy.
BX4 – Beeching Road Enhancement Area	10	Y			Y	P	LT	Y	This predominately employment and community use focused policy seeks to enhance the Beeching Road area which will likely materialise in the longer term. Some of the public realm improvements could be seen in the shorter term but this may be dependent on new development coming forward to provide these. No negative impacts have been identified. This policy makes direct reference to policy LWL policy and also relates to proposed allocation BX5.
BX18 – West Bexhill Growth Area - Infrastructure Policy	15	Y			Y	P	LT	Y	This policy focuses on a wide range of infrastructure required to support new development in the area and is therefore mainly linked with the range of proposed allocations coming forward to deliver the relevant improvements. This therefore is more likely to occur in the longer term for the improvements to fully come forward. No negative impacts have been identified.
BX29 – North Bexhill Growth Area - Infrastructure Policy	15	Y			Y	P	LT	Y	This policy focuses on a wide range of infrastructure required to support new development in the area and is therefore mainly linked with the range of proposed allocations coming forward to deliver the relevant improvements. This therefore is more likely to occur in the longer term for the improvements to fully come forward. No negative impacts have been identified.
BX30 – Land south of Haven Brook Avenue – Infrastructure	9	Y			Y	P	LT	Y	This policy focuses on a specific set of infrastructure required to support new development on four proposed allocations in North Bexhill coming forward to deliver the relevant improvements. This therefore is more likely to occur in the longer term for the improvements to fully come forward. No negative impacts have been identified but as this policy is narrower in focus and geographic scope it does not score as highly compared to other policies, such as BX29 which covers the wider North Bexhill area.
GU6 – Rock Lane Urban Fringe Management Area	9	Y			Y	P	LT	Y	This policy primarily seeks to improve the landscape character, biodiversity and access to the countryside which would have long term positive impacts. No negative impacts have been identified. This policy has synergies with others previously consulted on,

Area-based policies	Score	1. Does this have a <u>significant</u> effect on the SA objective(s), whether positive or negative? State Y/N	2. Is the likely Impact? Negative (-1)	2. Is the likely Impact? Neutral (0)	2. Is the likely Impact? Positive (1)	3. Is this a temporary or permanent Impact? State T or P	4. Is this a short term or long term impact? State ST or LT	5. Are there synergies between other <u>policies</u> (or options) which might amplify the effect? State Y or N	6. Commentary/Notes Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score
									such as those related to Public Rights of Way and Green & Blue Infrastructure. This policy has also had an influence on the site allocations proposed in the area.
RH2 – Employment Land, Harbour Road, Rye	12	Y			Y	P	LT	Y	The policy will work together with other Local Plan policies to safeguard and enhance employment land to meet identified needs, as well as those dealing with environmental management and pollution.

Chapter 7:

Cumulative effects, monitoring and other reporting requirements

This section covers the SA of the cumulative effects of the Local Plan. It also includes information on other requirements of the SA process, including the arrangements for monitoring implementation of the Local Plan.

Assessing cumulative effects

- 7.1. The SEA Regulations require that consideration is given to the cumulative effects of implementing a plan or programme, and this is undertaken as part of the Sustainability Appraisal process.
- 7.2. For the SA of the Rother Local Plan, cumulative effects have been considered, up to this point in this report, through the assessment of the Development Strategy and thematic topic area policies, in line with the SA Framework, discussed in Chapter 2. Chapters 4 and 5 of this report include tables assessing the likely effects of these policies (or in some cases, policies considered together as chapters). The tables have considered effects in terms of their duration, synergies with other policies, and cumulative nature.
- 7.3. This section of the SA report builds on these previous assessments to provide an overall view on the cumulative effects. First, by considering the Local Plan policies together as a whole, including the site allocations. And second, by considering the effects of implementing the Local Plan in combination with other key plans or projects in the district and its surrounding area.
- 7.4. The SA of cumulative effects assumes a “policy on” approach, which includes consideration of those policies which require mitigation measures from new development to help avoid or minimise adverse impacts of development, or improve the sustainability of it overall.

Local Plan as a whole

- 7.5. Figure 36 below sets out the SA scoring of cumulative effects for the 20 SA objectives. It is accompanied by supporting commentary of the scores for each SA objective.

Figure 36: SA of cumulative effects of Local Plan

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

SA1: Reduce air pollution from transport and development and improve air quality

- 7.6. Through the Development Strategy, the Local Plan seeks to facilitate a significant increase in development and growth across the district. This will result in an associated increase in population and a greater volume of vehicles, which is likely to increase air pollution from transport. Locating new development within and around existing settlements may enable and support transport modal shift to more sustainable modes, such as walking and cycling. However, a level of car use/reliance is expected given the largely rural nature of the district and existing level of public transport infrastructure provision and services.
- 7.7. The Local Plan includes thematic topic area policies which seek to ensure that air quality impacts are appropriately considered and mitigated through the development management process, and that new infrastructure (including for public transport and active travel) is delivered. This can help to offset or avoid negative impacts on air quality which are associated with, or result from, significant new development and growth in the district.
- 7.8. A minor negative effect is predicted as it is unlikely that significant reductions in air pollution from development and transport can be realised owing to the levels of growth planned. This is despite positive measures included in the plan around transport modal shift and pollution control. It is noted that the baseline is a relatively positive situation, with no Air Quality Management Areas currently in Rother.

SA2: Biodiversity is protected, conserved and enhanced

- 7.9. The Local Plan seeks to protect internationally and nationally designated habitats sites, in line with the relevant legislative and policy requirements. A separate Habitats Regulations Assessment has been carried out as part of the Plan process. Notwithstanding the findings of the

HRA, the Development Strategy broadly seeks to locate development away from protected or designated habitats sites, which is positive against this SA objective.

- 7.10. At a local and site-specific level, the introduction of new development (particularly on and around greenfield land and in the countryside) may have adverse effects on biodiversity. The Local Plan includes thematic topic area policies and site allocation requirements to ensure biodiversity is appropriately considered through the development management process, including necessary mitigation approaches and measures. There is a mandatory requirement for biodiversity net gain in England for some types of new development, which the Local Plan aligns with. It also helps give effect to the East Sussex Local Nature Recovery Strategy and sets measures to help ensure off-site contributions can be pooled to secure positive enhancements to the local biodiversity network, in line with the LNRS. The inclusion of a green and blue infrastructure framework also supports this objective.
- 7.11. A minor positive effect is predicated at the wider strategic level and therefore for the plan overall for this SA objective; however recognising that there may be negative impacts on biodiversity on a site-by-site basis if development is not appropriately managed and mitigated.

SA3: The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation)

- 7.12. Through the Development Strategy, the Local Plan seeks to facilitate a significant increase in development across the district. This will likely result in an associated increase in emissions arising from the construction and operation of new development as well as a greater volume of vehicles, both from residential and commercial uses.

- 7.13. Transport is a significant contributor of carbon emissions locally, which is a concern in respect of this SA objective. The strategy seeks to support sustainable development by focussing development within existing settlements and urban areas and encouraging transport modal shift. However, opportunities for modal shift are likely to be more limited in Rother's rural areas, where investment in public transport infrastructure will be necessary to achieve significant shifts from private car use.
- 7.14. Focussing new development within and around Bexhill, in particular, can provide opportunities for decentralised energy networks through a critical mass of development and necessary enabling heat loads. However, there are some uncertainties about the technical feasibility and financial viability of implementing these at scale, in the absence of further detailed and site-specific investigations; and even if such networks do come forward in the future, significant reductions in carbon emissions may not be realised within the plan period, as the residual time in the plan period from the point of their delivery may be short.
- 7.15. The Local Plan includes topic area policies which set out measures to promote sustainable design and construction, improve the energy efficiency of buildings and to reduce emissions in their operation. This will provide positive outcomes against this SA objective, particularly for new build development. However, there is a large amount of existing, older building stock which contributes significantly to energy use and carbon emissions in the district - the Local Plan has less scope to influence this situation except through requirements around sustainable retrofitting measures. However, these will only apply in instances where planning permission is required and if householders / property owners indeed pursue retrofitting or building improvement works. Therefore, there are limitations on the extent to which carbon reductions can be realised.
- 7.16. It is important to emphasise that carbon reduction must be seen in the context of the wider regional, national and international context and coordinated responses to this. This is not solely a local issue that the Local Plan, or indeed the Council, can resolve independently.
- 7.17. Overall, a minor negative effect is predicted as it is unlikely that significant reductions in carbon emissions over the baseline can be realised within the plan period. Significant negative effects are not predicted as the plan includes a range measures to promote and enable transport modal shift, and secure more sustainable, energy efficient and net zero carbon development.
- SA4: Minimise water consumption*
- 7.18. The Local Plan seeks to facilitate a significant increase in development across the district to meet identified needs, including for housing and employment uses. This will result in an associated increase in population and business activity, which is likely to lead to additional water consumption across the district overall, from residential, commercial and other uses. As Rother is identified as a water stressed area, additional water consumption may create or exacerbate issues of sustainable resource use.
- 7.19. The Local Plan includes thematic topic area policies which will provide for a strengthening and step change in water efficiency standards. Therefore, minor negative effects for this SA objective are not predicted.
- SA5: Manage and reduce the risk of flooding (fluvial, tidal and surface water), now and in the future, and increase resilience to the wider effects of climate change.*
- 7.20. Parts of Rother are at risk of tidal flooding given its coastal location. The majority of the district is located in Flood Zone 1 and therefore not at risk of fluvial flooding, however there are areas located in Flood Zones 2 and 3 at greater risk (particularly to

the east in and around Rye). There is surface water flood risk across the district, but this is localised and concentrated along topographical flow paths of existing watercourses, dry valleys or roads. No formal critical drainage areas have been identified within the district; however the Fairlight/Pett area is of concern with regard to surface water drainage. The majority of the district is at a negligible risk of groundwater flooding.

- 7.21. Overall, the Development Strategy set out in the Local Plan will facilitate the introduction of new development in locations at different levels of risk of flooding from various sources. This includes fluvial flood risk in Flood Zones 2 and 3. The HELAA and other evidence has confirmed that there is a lack of available and deliverable sites exclusively in Flood Zone 1, or other areas at lower risk of flooding from different sources, and this has necessitated that the Council seek to find potential development sites, to meet identified needs, in those areas that are at greater flood risk.
- 7.22. New development is likely to have an 'urbanising' effect in parts of the district (particularly where multiple site allocations are in proximity), and/or result in development on greenfield land. The addition of impermeable and semi-impermeable surfaces may exacerbate flood risk within individual sites, or in areas downstream of development sites. The extent and severity of this is difficult to predict at this time, as effects will largely be dependent on whether SuDS and other flood mitigation measures are integrated into development, as well as the effectiveness of these, including their long-term management. Further, flood incidents and impacts from neighbouring authorities may also affect areas in Rother.
- 7.23. Flood risk will largely be dealt with through site specific considerations. Having regard to a Strategic Flood Risk Assessment, the Local Plan site allocations include provisions for measures to appropriately

manage flood risk, in line with national planning policy and guidance. Further, the plan includes thematic topic area policies that ensure flood risk is appropriately identified and addressed through the development management process, including through site-specific Flood Risk Assessments.

- 7.24. Overall, there are both negative and positive effects predicted which, on balance, result in a neutral score on this SA objective; also recognising that there are uncertain effects given further site-specific assessments needed at the planning application stage.

SA6: The risk of coastal erosion is managed and reduced, now and in the future

- 7.25. The district is bounded by the English Channel to the south, with the coastline at risk of tidal flooding. Tidal flooding has been recorded in Rye Harbour and Camber due to the overtopping of defences, and coastal flood risk will potentially increase where coastal erosion threatens the stability of tidal flood defences.
- 7.26. The Development Strategy set out in the Local Plan broadly seeks to locate development away from the coastline, minimising potential for deterioration of the it. Site specific flood risk considerations will be assessed through the development management process, where the Local Plan includes topic area policies including requirements for site-specific Flood Risk Assessments, where appropriate.
- 7.27. The Local Plan designates a Coastal Change Management Area, along with supporting policies. This places restrictions on the type of development within this area, with the intention to address the coastal environment, including coastal erosion. Furthermore, tidal flood defences are dealt with in the Local Plan by infrastructure requirements, and link to the Infrastructure Delivery Plan.
- 7.28. Overall, the minor positive effects are predicted given the new measures

introduced by the Local Plan to address this SA objective.

SA7: The health and well-being of the population is improved and inequalities in health are reduced

- 7.29. The Local Plan Development Strategy seeks to locate new development in areas where there is relatively good access to services and facilities, along with open space. However, additional demands will arise from a growing population, and an appropriate level of infrastructure will be required, which the Local Plan does seek to address through its relationship with the Infrastructure Delivery Plan.
- 7.30. The Development Strategy will help to facilitate new housing and commercial development, which can help to address the determinants of health and wellbeing and inequality, such as access to housing and employment along with training and skills opportunities.
- 7.31. The Local Plan site allocations and thematic topic area policies set out a range of provisions that require new developments to contribute to or directly provide community facilities (or other social infrastructure), open space and biodiversity enhancements and public realm improvements, where appropriate. This is likely to result in positive outcomes for the health and wellbeing of the local population.
- 7.32. At a local and site-specific level, there may be impacts on the amenity of properties and people as new development comes forward, such as during the construction phase. The plan includes policies to ensure the protection of amenity and safeguards from various forms of pollution.
- 7.33. It is noted that the Local Plan production has been supported by an integrated Health Impact Assessment.
- 7.34. The wider determinants of public health, health inequalities and public health outcomes is complex, and dependent on a wide range of factors, some of which are

outside the scope of the Local Plan to influence. There are therefore some uncertainties with the assessment. Overall, it is predicted that the plan will have minor positive effects on this SA objective.

SA8: More opportunities are provided for everyone to in a suitable home to meet their needs

- 7.35. Through the Development Strategy, the Local Plan seeks to facilitate a significant increase in development across the district, particularly for housing. This is likely to provide more opportunities for people to access housing in Rother. Whilst the amount of development will not meet the Government's Local Housing Need target in full, the Plan will nonetheless provide for a significant uplift in housing, well above the levels currently provided for in the extant Local Plan. The inclusion of site allocations for new housing, which help give effect to the Development Strategy, provide further reassurances around the locations where new housing will be supported and delivered.
- 7.36. The Local Plan includes thematic topic area policies which address a wide range of housing needs and respond to evidence of local needs, such as those set out in the Housing and Economic Development Needs Assessment. The policies include provisions for dwelling size and mix, affordable housing, specialist accommodation including for older people, self and custom build housing, and accessible and adaptable housing. The Local Plan also includes policies and site allocations to address needs of the gypsy, traveller and travelling showpeople community.
- 7.37. Overall, significant positive effects are predicted for this SA objective.

SA9: All sectors of the community have improved accessibility to services, facilities, jobs, and social and cultural opportunities

- 7.38. Through the Development Strategy, the Local Plan seeks to locate significant new development in and around existing

settlements. Existing settlements benefit comparatively good access to local services and facilities and in many cases, are within easy reach of train stations, bus stops or other public transport nodes which enable access to a wider catchment area. The plan also makes provision for public realm enhancements to facilitate transport modal shift, for example, to improve opportunities to access services and facilities by walking, cycling and wheeling.

- 7.39. The Local Plan includes provisions to meet the district's identified needs for economic development (including business and retail space), including site allocation policies which require employment development to be delivered either solely or as part of mixed-use schemes. This will help to enable greater access to local jobs, however recognising that many people commute outside of the district for work.
- 7.40. The Local Plan also includes policies which seek to support the vitality and viability of town and local centres throughout the district, which are focal points of community and cultural activity. On larger strategic site allocations, such as in the north and west of Bexhill, the Local Plan makes provisions for developments to provide or contribute to new commercial space and community uses.
- 7.41. Owing to the rural nature of Rother, the population in parts of the district will not benefit from the same level of access to services and facilities than those in larger settlements or more urbanised areas. However, the Local Plan seeks to address this situation through a wide range of interventions and therefore significant positive effects are predicted.

SA10: Safe and secure environments are created and there is a reduction in crime and fear of crime

- 7.42. Through the Development Strategy, the Local Plan seeks to locate significant new development in sustainable locations, in and around existing settlements. This will help to ensure new developments are not

isolated and can take advantage of, or integrate well with, the existing public realm. This may also support the provision of essential services (such as police and emergency services) in terms of the geographic scope of coverage.

- 7.43. The Local Plan includes a raft of refreshed design policies that reflect the Government's National Design Guide and other good practice guidance. These policies will help to ensure that new developments respond positively to the need to provide safe and secure buildings and environments. The Local Plan policies also seek opportunities to create or enhance public realm in order to enable and support transport modal shift; and ensure the public realm is designed with the needs and safety of those moving by active travel in mind.
- 7.44. The Infrastructure Delivery Plan, a companion document to the Local Plan includes infrastructure requirements and funding arrangements for emergency services, where appropriate.
- 7.45. Overall, minor positive effects are predicted for this SA objective.

SA11: Historic environment/townscape is protected, enhanced and made more accessible

- 7.46. Rother has an extensive and valued historic built environment that includes designated heritage assets such as Listed Buildings, Conservation Areas, Scheduled Ancient Monuments, Registered Parks and Gardens, and the 'Historic Battlefield' at Battle. There are also many other non-designated buildings and archaeological assets which contribute positively to the physical, historic and socio-cultural character of the district.
- 7.47. The Development Strategy seeks to locate significant new development in and around existing settlements. These are locations where many of the aforementioned heritage assets are situated. There is an inherent tension in facilitating new development across the district to meet local needs,

whilst conserving and enhancing the historic environment.

7.48. The Local Plan includes provisions to conserve and enhance heritage assets and their setting, in line with the relevant legislative and national planning policy requirements. This includes thematic topic area policies and requirements on site allocations. Impacts or harm to heritage assets and their setting will principally be determined through the development management process, as planning applications are considered.

7.49. Overall, the effects on this SA objective are uncertain.

SA12: The risk of pollution to land and soils is reduced and quality is improved.

7.50. The Local Plan seeks to prioritise the re-use of brownfield land, wherever possible. This can assist with land remediation and improving ground conditions. The Local Plan also sets out to make the optimal use of land and development sites, for example, by seeking appropriate higher density development. This can assist in reducing the overall land take from new development.

7.51. However, given the significant development needs across the district (such as for housing), and the limited supply of suitable, available and achievable brownfield sites to meet these needs, the Local Plan requires that new development on greenfield land is enabled. This is likely to result in the loss of higher quality agricultural land in some cases. As set out in the site assessments, negative scores for this SA objective have been attributed to site allocations located on Grade 1, 2 and 3 agricultural land. Greenfield development may also create a risk to ground conditions via pollution from the construction and operation of development, unless appropriately mitigated.

7.52. Thematic topic area policies in the Local Plan include provisions for environmental protection, such as requirements for mitigation measures where necessary.

However, impacts to ground conditions from pollution will principally be determined through the development management process, as planning applications are considered.

7.53. Overall, the effects on this SA objective are uncertain; however, recognising that some negative effects are assessed from the allocation of those sites that are of higher agricultural land value or greenfield land.

SA13: Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced.

7.54. The Local Plan will facilitate a significant increase in development across the district. This will result in an associated increase in population and activities, which is likely to lead to greater amounts of waste being generated compared to the current situation.

7.55. The Local Plan includes some measures to promote circular economy principles to help minimise waste, increase recycling and re-use of materials, for example, in policies dealing with the construction and design of commercial uses. However, waste management matters are largely outside the scope of the Local Plan as they are dealt with by the East Sussex Minerals and Waste Plan(s), which forms part of the statutory Development Plan for the district.

7.56. Overall, a minor negative effect on this SA objective is predicted, owing to the limited scope of the plan to address this matter, in the context of the East Sussex Minerals and Waste Plan.

SA14: The risk of pollution to water is reduced and water quality is improved.

7.57. Through the Local Plan, the Development Strategy seeks to facilitate a significant increase in development across the district. This will result in an associated increase in population and activities, including residential and commercial uses. This is likely to lead to greater risk of pollution to

both ground and surface water and also add to demands for and pressure on existing infrastructure, such as wastewater treatment facilities.

- 7.58. The Local Plan includes thematic topic area policies which seek to ensure new development adequately assesses and demonstrates that water quality, and other water management issues, can be suitably addressed. The plan also includes provisions for new development contribute to, or directly deliver, infrastructure to support water quality objectives. Further details on relevant infrastructure projects are set out in the Infrastructure Delivery Plan.
- 7.59. Surface water run-off and drainage is a key local issue particularly in the Pevensey Levels area, where there are water quality concerns in relation to designated and protected habitats sites. This is because poor quality water draining into these sites could have an even greater impact on the environment and ecology. In response to this, the Local Plan includes policies that require new developments to be designed to effectively manage wastewater, and for surface water to pass through at least two treatment stages across the district, and a minimum of three stages in the Pevensey Levels hydrological catchment.
- 7.60. It is noted that a separate Habitats Regulations Assessment has been carried out and addresses the matter of water quality on protected sites, including for the Dungeness complex of habitats sites and the Pevensey Levels.
- 7.61. Overall, the effects on this SA objective are uncertain. There are some positive effects predicted owing to the Local Plan thematic topic area policies and other site-specific provisions, including for supporting infrastructure. However, the nature and extent of impacts to water quality is difficult to predict at this stage. The impacts of development will principally be determined through the development management process, as planning applications are

considered. In addition, there are potential cross-boundary effects at a wider catchment basis, where impacts from development in other neighbouring authorities could affect water quality in Rother.

SA 15: Ensure that Parks, gardens and countryside are protected, enhanced and made more accessible.

- 7.62. Through the Development Strategy, the Local Plan seeks to facilitate a significant increase in development and growth across the district. The Local Plan aims to prioritise development within and around existing settlements and more urbanised areas, to support a sustainable conglomeration of uses and where there are opportunities for the re-use of brownfield land. However, the Local Plan does make provision for new development to come forward on greenfield sites and sites within the countryside, including the High Weald National Landscape. This is owing to the lack of suitable, available and achievable brownfield sites, and sites in existing settlements (including those outside the National Landscape) to meet identified housing needs in full.
- 7.63. Provisions for new development on greenfield land and within the countryside, including the National Landscape, compromise or sit at odds with this SA objective. However, the Local Plan includes a suite of thematic topic-based policies which will help to ensure that significant adverse impacts on the character of these areas is avoided, or if it cannot be, then minimised and appropriately mitigated.
- 7.64. It is noted that the Council has a statutory duty to further the purposes of protected landscapes, including National Landscapes. This has been considered through preparation of the Local Plan. The consideration of 'major development' within the National Landscape will be considered on a base by case basis, through the development management process, and this will help to ensure the statutory duty for

protection of the landscape is further considered through the planning application and approval regime.

- 7.65. The site appraisal process in this SA has considered landscape sensitivity, and some sites score less favourably than others in this respect, as set out in Chapter 6 of this SA Report. The Local Plan site allocations also include specific provisions dealing with landscape sensitivity and design, which can help to ensure that developments are designed with reference to their local context.
- 7.66. On a separate but related matter, the Local Plan includes provisions for new development to contribute to the delivery of new and improved public realm and as well as publicly accessible open spaces, in certain circumstances, which support this SA objective.
- 7.67. Overall, the Local Plan is predicted to have a minor negative effect on this SA objective; however, it is recognised that the future development of some sites could have more significant adverse effects, depending on the nature, scale and location of development.

SA16: Economic performance is improved; and

SA17: There are high and stable levels of employment and diverse employment opportunities for all

- 7.68. This summary considers SA Objectives 16 and 17 together, although they have been assessed separately.
- 7.69. Through the Local Plan, the Development Strategy makes provisions to accommodate identified economic development needs for the district in full. This includes needs for employment uses (including industrial, warehousing, and office) along with main town centre uses (such as retail, leisure, cafes/restaurants, drinking establishments, and cultural venues). Site allocation policies make provisions for employment or commercial uses to be delivered on-site,

either solely or as part of mixed-use schemes.

- 7.70. In addition, thematic topic area policies seek to protect and enhance economic uses and also include measures to support the vitality and viability of town and local centres. This includes considerations for local economic sectors such as the visitor economy. Provisions are also made for supporting the rural economy, including agricultural and equine uses. On whole, there are a wide range of provisions to support local economic development. However, recognising that in some instances the loss of higher value agricultural land is necessitated to accommodate land for housing.
- 7.71. It is also expected that opportunities will arise with economic sectors associated with construction and development industries, such as housebuilding, including the construction and maintenance of different types of infrastructure across the district.
- 7.72. It is noted that economic performance, employment growth and job stability are dependent on macro-economic factors. For example, the UK economy has been affected by the impacts of Brexit and recent international conflicts. However, where the Local Plan has an opportunity the influence the conditions for supporting economic development, there are a wide range of positive measures in place.
- 7.73. Overall, significant positive effects are predicted for these SA Objectives.

SA18: Levels of poverty and social exclusion are reduced, and the deprivation gap is closed in the more deprived areas

- 7.74. Through the Local Plan, the Development Strategy will help to facilitate the delivery of a significant amount of new housing, including affordable housing and specialist accommodation, along with employment development. Topic area policies and site allocations make provision for new and improved public open spaces, along with

access enhancements to such existing and new spaces. There are additionally provisions for development to contribute to the delivery of social and community infrastructure.

- 7.75. The wider determinants of inequality and deprivation are complex and dependent on a wide range of factors, some of which are outside the scope of the Local Plan to influence. It is therefore difficult to determine the extent to which the local population, particularly in more deprived areas, will be able to fully benefit from the provisions; for example, being able to access new affordable housing and employment opportunities.
- 7.76. Overall, minor positive effects are predicted for this SA objective.

SA19: Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve.

- 7.77. Through the preparation of the Local Plan, the Council has engaged with infrastructure providers, including East Sussex County Council in its education capacity, to plan positively for the education provision needed to support growth planned in the district. Some site allocations set requirements for new development to contribute to education either through direct provision of land for facilities or contributions towards these. This links with the Infrastructure Delivery Plan, which will be a key consideration for major development schemes and strategic site allocations.
- 7.78. In addition, thematic topic area policies include provisions for the safeguarding of community uses, which includes schools and other education and training facilities. Policies also set out expectations for planning contributions towards skills and training, which may be required on a case-by-case basis through the development management process.

- 7.79. The Local Plan broadly seeks to encourage and enable transport modal shift, which can help to enhance access to education, skills and training opportunities within the district, or beyond.

- 7.80. Overall, significant positive effects are predicted for this SA objective.

SA20: Road congestion levels are reduced and there is less car dependency and greater travel choice.

- 7.81. Through the Local Plan, the Development Strategy seeks to facilitate a significant increase in development across the district. This will result in an associated increase in population and activities, and consequently a greater volume of vehicles. The Development Strategy approach broadly seeks to locate new development within and around existing settlements, where there is comparatively better access to services and facilities, as well as public transport options. The approach is likely to enable and support modal shift away from cars to active travel modes, and use of public transport. However, a level of car use and reliance is still expected given the largely rural nature of the district, as well as the existing level of public transport infrastructure provision and services.
- 7.82. The Local Plan includes a wide range of provisions to improve accessibility and promote modal shift. The plan refers to and helps give effect to key strategies, such as the Local Cycling and Walking Infrastructure Plan. The plan makes clear that developments will be required to provide transport assessments to consider the impact of development, and to appropriately mitigate adverse impacts on the highway network.
- 7.83. Site allocation policies include specific requirements for development to improve accessibility within and around sites, and to mitigate impacts on the highway network. Further, there are strategic policies dealing with funding for the necessary infrastructure to support growth in the district, which is

linked to the Infrastructure Delivery Plan - this includes an extensive list of transport schemes that development may be required to assist in funding and/or delivering directly.

- 7.84. There are positive effects predicted as the Local Plan is likely to support and enable active travel and greater travel choice over the plan period, particularly in larger settlements and urban areas. However, overall, minor negative effects are predicted for this SA objective. This is given the amount of growth planned and likelihood that it will lead to an increase in vehicles in the district and potentially create or exacerbate congestion at or near some key highway junctions and roads.

Cumulative effects with other plans and programmes

- 7.85. The Rother Local Plan does not sit in isolation. Rather, is informed by and will help give effect to other strategic plans, programmes and projects. This has been discussed previously in this SA Report, as part of the scene setting for the preparation of the SA Framework.
- 7.86. For the purpose of considering cumulative effects, the intention here is to consider the potential effects of the Rother Local Plan in combination with other plans and projects that provide for significant new development. To help focus this assessment and make it proportionate in scope, this section considers the key plans prepared by East Sussex County Council and the Local Plans of Rother's adjoining and nearby neighbouring authorities. The main focus is on plans setting a framework for new development, including significant infrastructure projects.³⁶

County level plans

- 7.87. At the county level, the main responsibilities for East Sussex County Council are with

transport, minerals and waste, as well as biodiversity.

- 7.88. The **East Sussex Local Transport Plan 4 (LTP4) 2024–2050** outlines strategies to create an inclusive, decarbonised, safe, and resilient transport system for residents, businesses, and visitors. It sets out key strategic priorities including public transport improvements, active travel networks, freight and logistics, and integration and accessibility. It identifies key transport schemes or projects to support these.
- 7.89. The **East Sussex Local Cycling and Walking Infrastructure Plan (LCWIP)** sets out proposed cycling and walking networks and measures within specific areas of the county, including Rother. The LCWIP focusses on areas where there are the greatest opportunities to increase levels of cycling and walking.
- 7.90. The waste and minerals planning strategy for East Sussex is set out in a series of documents collectively known as the **Waste and Minerals Local Plan**. For land-use development, the plan identifies locations where waste management uses will be safeguarded and supported, along with Mineral Safeguarding Areas.
- 7.91. East Sussex County Council has been appointed as the responsible authority to develop a **Local Nature Recovery Strategy (LNRS)** for East Sussex and Brighton & Hove. The LNRS was published in June 2026 and sets out 8 principles to guide nature recovery across the region, supported by priority measures which are mapped.

Potential for cumulative effects

- 7.92. There is a potential for the cumulative effects when the Local Plan is considered alongside these county level plans.
- 7.93. With the transport plans, the effects are broadly considered to be positive in relation

³⁶ This review does not therefore consider other regionally based key plans and strategies prepared by

infrastructure providers, such as Water Resource Management Plans prepared by Water Companies.

SA Objectives 1 (air pollution), 9 (accessibility to services) and 20 (transport). This is because the transport plans broadly promote sustainable transport modal shift.

- 7.94. With the Minerals and Waste Plans, the effects are considered to be neutral overall. The plans support the circular economy and the waste management hierarchy, and likely to have positive effects on SA Objective 13 (waste and recycling). However, given the specific nature of land uses (waste management and extraction), these could have adverse site-specific or local impacts if not appropriately mitigated. Therefore, there are potential negative effects in particular for SA Objectives 1 (air quality) and SA12 (pollution).
- 7.95. The Local Nature Recovery Strategy will have likely cumulative and significant positive effects on several SA Objectives, including SA2 (biodiversity), SA7 (health and wellbeing), SA15 (natural landscape), SA18 (deprivation).

Neighbouring authority Local Plans

- 7.96. The following sub-section looks at potential cumulative effects of the Rother Local Plan in combination with neighbouring authority local plans, focussing mainly on those district and borough council areas in East Sussex. For this assessment, only adopted plans are considered as there is certainty about their implementation.
- 7.97. For Hastings, the Local Plan currently comprises the **Hastings Planning Strategy 2011-2028 (2014)** and **Development Management Plan (2015)**. The plan sets out a target of 3,400 net additional homes 70,000 square metres employment floorspace, and 20,500 square metres retail floorspace over the plan period. Future development is focused in and around the town, however some development is expected in the peripheral areas. The plan sets out 3 main spatial areas (western,

central, eastern) along with 13 planning focus areas that provide more detail on the amount and distribution of growth.

- 7.98. The **Eastbourne Core Strategy Local Plan 2006-2027 (2013)** seeks to deliver 5,022 new homes with priority locations including the town centre and Sovereign Harbour. The **Eastbourne Employment Land Local Plan (2016)** sets out the updated approach and provisions for employment land.
- 7.99. The **Folkestone & Hythe Core Strategy Review (2022)** and **Places and Policies Local Plan** set the planning framework for the authority area. The Core Strategy Review sets a target of 13,284 net additional homes over the 18-year plan period, and 40,250 square metres of employment floorspace, and 35,700 square metres of retail floorspace. The spatial strategy is broadly focussed on optimising land in the existing urban area, growth in existing settlements within the Romney Marsh area, and a new garden community in the North Downs Area.
- 7.100. For Lewes, the Local Plan currently comprises the **Lewes Local Plan Part 1: Core Strategy 2010-2030 (2016)**³⁷ and **Part 2: Site Allocations & Development Management Policies (2020)**. The Core Strategy sets out a target of 6,900 net additional homes, 71,000 square metres employment floorspace. It suggests limited need for additional retail floorspace. Housing growth is distributed by settlements, the majority of which is earmarked for Lewes town, Newhaven and Peacehaven & Telcombe. More than half of the district is covered by the South Downs National park, which is a key factor informing the spatial strategy.
- 7.101. South Downs National Park Authority has prepared the **South Downs National Park Local Plan 2014-2033 (2019)**, which covers the entirety of the National Park. The plan makes provision for approximately 4,750 net additional homes between 2014 and 2033,

³⁷ This is a joint document prepared by Lewes District Council and South Downs National Park Authority.

and roughly 11 hectares employment floorspace. The spatial strategy is broadly for dispersed growth across the area, in response to the distinctive characteristics of the National Park and need to protect it.

7.102. The **Tunbridge Wells Local Plan 2020-2038 (2025)** sets a target of 12,204 net additional homes and 14 hectares of employment floorspace. It suggests no additional need for retail floorspace. The strategy broadly provides for growth of existing settlements, together with expansion of Paddock Wood based on garden city principles, along with some focussed green belt release. Lamberhurst and Hawkhurst are in proximity to Rother's northern boundary and include some growth, and the A21 crosses the administrative boundaries.

7.103. The Wealden Local Plan currently comprises the **Wealden District Core Strategy Local Plan (2013)**, **'Saved' Policies (1998)** and the **Affordable Housing Delivery Local Plan (2016)**. The Core Strategy sets a target of 9,440 net additional homes over the period 2006-2027. Provision is also made for 40,000 square metres net employment floorspace (to provide for 128,695 square metres net employment floorspace) and 17,000 square metres net additional retail floorspace. The broad distribution of growth is set in accordance with the settlement hierarchy. Of particular relevance to Rother, Ninfield at Wealden's southeastern boundary is set for moderate growth (11-50 dwellings) and Wadhurst at the northeastern boundary is set for high growth (51-150 dwellings). There are also shared coastline management, water management and habitats issues in the Pevensey area.

7.104. The **Ashford Local Plan 2030 (2019)** sets a housing target of 16,872 from 2011-2030, which is reduced to 13,118 net additional dwellings from 2018-2030 considering past completions. The plan also makes provision for 63 hectares of employment land, along with roughly 15,500 square metres of retail floorspace at Ashford centre and some 1,200 square metres at Tenterden. The

spatial focus for new housing and commercial development is at Ashford centre, capitalising on its strategic transport links, along with some commercial development at key locations with access and links to motorways.

Potential for cumulative effects

7.105. Rother district effectively wraps around Hastings, and the authority areas share a Housing Market Area and Functional Economic Market Area.

7.106. There is therefore a likely potential for cumulative effects on the housing and economic market areas, particularly in terms of the SA Objectives 8 (Housing), 16 (Economic Performance) and 17 (Employment Levels). Positive effects are likely given that both of the authorities respective Local Plans seek to meet identified needs, and the preparation of a joint HEDNA helps to ensure coordination and a wider sub-regional view of these.

7.107. With Hastings and other authorities, the Local Plans provide for a significant increase in housing and other types of development in East Sussex and Kent. This is likely to result in increased needs for supporting infrastructure, particularly for transport and community facilities to support the needs of a growing population. There is a potential of negative effects on a number of SA objectives if the timely delivery of supporting and adequate infrastructure is not provided, both within Rother and elsewhere, or if mitigation measures are not implemented; although there remains some uncertainty and this will need to be monitored over the plan period. Key SA objectives in this respect include SA9 (Accessibility to Service) and SA20 (Transport)

7.108. Likewise, the cumulative effect of new development across the sub-region is likely to result in additional pressure water infrastructure and need for effective water management. This is particularly for water supply and wastewater management. As well, increased development, particularly on

greenfield land, may have implications for flood risk if development is not appropriately located and designed. This is a particular issue given Rother's coastal location and river network, and the current baseline situation, for example, being a water stressed area and where flood risk exists and flooding incidents have been experienced. Key SA objectives include SA4 (Water Consumption), SA5 (Flooding) and SA6 (Coastal Erosion).

- 7.109. From a biodiversity perspective, there are potential negative effects on habitats sites through the cumulative effect of development, and in particular through additional pressure from tourism and recreational uses on the Dungeness Complex of Habitats Sites. This is a matter that has been identified and addressed through the HRA, with a specific policy in the Local Plan prepared in response to this, which will help to ensure adverse impacts are appropriately mitigated.

Habitats Regulations Assessment

About the HRA

- 7.110. A Habitats Regulations Assessment (HRA) refers to the several distinct stages of Assessment which must be undertaken in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended) and the Conservation of Offshore Marine Habitats and Species Regulations 2017 (as amended) to determine if a plan or project may affect the protected features of a habitats site before deciding whether to undertake, permit or authorise it.
- 7.111. Separate HRA reports have been prepared at the Regulation 18 and Regulation 19 stage of the plan process to support the Rother Local Plan. These reports should be referred to for further information.
- 7.112. The SEA Regulations require that any existing environmental problems which are relevant to the Local Plan including, in particular, those relating to any areas of a particular

environmental importance, such as areas designated habitats, should be set out.

HRA of the Rother Local Plan

- 7.113. The HRA (2024) identified the following sites relevant to Rother, as they are within 10 km of the district and/or are judged to have impact pathways, and therefore merit further consideration:

- Dungeness SAC
- Dungeness, Romney Marsh and Rye Bay Ramsar and SPA
- Hastings Cliffs SAC
- Pevensey Levels Ramsar and SAC
- Ashdown Forest SAC and SPA
- Lewes Down SAC

- 7.114. 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

- 7.115. The HRA (2024) followed with a series of recommendations, which have been considered by the Council to support the preparation of the Regulation 19 version of the Local Plan.

- 7.116. The HRA (2026) provides an update to the assessment and associated work undertaken to-date. It sets out the results of a screening exercise and then carries forward an Appropriate Assessment of relevant sites 'screened in'. The HRA recommends that, to avoid adverse impacts on protected sites, specific mitigation measures are incorporated into the Local Plan (e.g., buffer zones, ecological surveys, restrictions on certain developments): ongoing monitoring and review of plan impacts on designated sites; and ensuring that future planning applications are subject to further HRA screening where necessary.

7.117. The Council will continue to engage with Natural England through the remainder of the plan process in order to ensure robustness of the HRA, and to reach agreement on any outstanding matters on this workstream.

Reasons for selecting the Local Plan and preferred approaches

7.118. In complying with the statutory requirements for the Sustainability Appraisal, the Council has provided the following statements on various aspect of the plan production process. The statements are provided under sub-headings covering various matters.

How environmental considerations have been integrated into the plan-making process

7.119. The production of the Rother Local Plan has been informed by an iterative process of Sustainability Appraisal. This has been undertaken from the early to the current stage of the plan process through to the Regulation 19 stage. The Council has had regard to the relevant statutory requirements, as well as relevant policies and guidance, for carrying out a Strategic Environmental Assessment and Sustainability Appraisal. The preparation of the SA Framework, with input from the statutory environmental bodies, has provided a basis from which to identify key environmental, economic and social sustainability issues for Rother; and to further assess the likely effects of the emerging and final proposals for the Local Plan and its policies. At each stage of the plan process, Council officers have considered the findings of SA reports in preparing and revising the policy proposals.

How the Sustainability Appraisal has been taken into account

7.120. At each stage of the plan process, Council officers have considered the findings of SA reports in preparing and revising the policy proposals. In particular, consideration has

been given to the assessment of the reasonable alternatives for the full complement of policy areas within the Local Plan, along with suggested measures to avoid or mitigate identified adverse impacts on SA objectives and to improve positive effects.

How consultation feedback has been taken into account

7.121. The Council considers that it has carried out consultation and engagement during the production of the Local Plan, in line with the relevant statutory requirements and the adopted Statement of Community Involvement.

7.122. As set out in Appendix 7 of this report, the Council has had regard to the representations made by the statutory environmental bodies (and others) on the SA/SEA Scoping Report and Interim SA Reports, to help inform the overall process for preparing the SA and the relevant assessments.

7.123. As well, the Council has considered all representations made to the statutory Regulation 18 public consultations on the Local Plan itself. The Council has prepared Consultation Statements setting out the main issues raised and how these have been considered during the production of the plan, and these should be referred to for further information.

7.124. Feedback on Local Plan consultations has informed considerations for the reasonable alternatives for the Development Strategy, thematic topic area policies and site allocations, as well as in the refinement of proposed policies and approaches.

The reasons for selecting the Rother Local Plan (Regulation 19 version) and preferred approaches, having regard to the reasonable alternatives

7.125. The reasons for selecting the Rother Local Plan (and policies) having regard to the reasonable alternatives are set out below.

7.126. The reasons for selecting the **Development (Spatial) Strategy**, the corresponding approach to residential development density and associated spatial strategic policies, are set out in Chapter 4 of this SA Report.

7.127. The reasons for selecting the thematic topic areas policies (i.e., as set out in the respective chapters titled Delivering New Homes, A Thriving Local Economy, Green to the Core, Live Well Locally, and Natural & Historic Environment) are as follows:

- The policies are considered to be considered to be in line with relevant legislation and consistent with national planning policies;
- The policies are supported by and respond to issues and matters set out in the Local Plan evidence base, particularly where national planning policy provides scope for the Council to set locally specific requirements or standards are;
- The policies have been considered through a Viability Assessment and are therefore considered to be deliverable;
- The policies have been informed by an iterative process of SA, and prepared having regard to suggested mitigation measures, to help ensure they address the objectives set out in the SA Framework in contributing to the achievement of sustainable development.

7.128. The reasons for selecting the **site allocation policies** are set out in Chapter 6 of this Report.

Monitoring

7.129. The SEA Regulations require the Council, in its capacity as the local planning authority responsible for producing the Local Plan, to monitor the significant effects of implementing the plan. This is specifically

for the purpose of identifying any unforeseen adverse effects at an early stage and to take remedial action. The Council is also required to provide a description of the measures envisaged for monitoring.

7.130. **Figure 37** below sets out a proposed monitoring framework, with a series of monitors set out for each of the 20 objectives in the SA Framework.

7.131. In order to assess and track the monitors, the Council should draw upon information that it maintains and produces itself (particularly development data) along with information that is also prepared by external agencies and bodies, for example, the Office for National Statistics and information prepared by Government bodies.

7.132. It is a statutory requirement for the Council to prepare and publish, at least annually, an Authority Monitoring Report (AMR). This is a document that assesses progress on the implementation of the adopted Local Plan and other related information. The Council has a well-established procedure for AMR reporting. Therefore, it is envisaged that the suggested significant effects indicators recommended in this SA Report can be incorporated into the AMR process (as the Council currently does with the extant Local Plan and associated SA indicators).

Figure 37: Monitors for the significant effects of the Rother Local Plan

SA objective	Suggested indicators / monitoring tools
1. Reduce air pollution from transport and development and improve air quality.	Air Quality Monitoring trends
2. Biodiversity is protected, conserved and enhanced.	- Change in assessed Condition of Sites of Special Scientific Interest Percentage - Infringements on habitats by planning applications - Change in ecological status of water bodies - Off-site planning obligations for biodiversity / biodiversity net gain
3. The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation)	- District-wide CO2 emissions data - District-wide CO2 emissions by sector - CO2 emissions per capita
4. Minimise water consumption.	- Domestic water consumption trends - Industrial and commercial water consumption trends - Areas classified as water stressed
5. Manage and reduce the risk of flooding (fluvial, tidal and surface water), now and in the future, and increase resilience to the wider effects of climate change.	- Strategic Flood Risk Assessment - Flooding incidents recorded - Planning permissions granted contrary to EA advice
6. The risk of coastal erosion is managed and reduced, now and in the future.	Planning permissions granted in the Coastal Change Management Area
7. The health and well-being of the population is improved and inequalities in health are reduced.	- Indices of Multiple Deprivation - Obesity rates in adults and children
8. More opportunities are provided for everyone to live in a suitable home to meet their needs.	- Number of net new homes delivered - Number of net new affordable homes delivered - Affordable homes delivered (percentage of all conventional housing units) - Affordable homes delivered (percentage by tenure type) - Dwelling size mix of new homes delivered - Net additional gypsy, traveller and travelling showpeople pitches and plots delivered (annually and plan-period to-date) - Housing register (waiting list)
9. All sectors of the community have improved accessibility to services, facilities, jobs, and social and cultural opportunities.	- Planning obligations for community infrastructure - Planning permissions for new community facilities
10. Safe and secure environments are created and there is a reduction in crime and fear of crime.	Police reported crime trends (rates)
11. Historic environment/ townscape is protected, enhanced and made more accessible.	- Number of assets on Heritage at Risk Register - Number of assets removed from Heritage at Risk Register
12. The risk of pollution to land and soils is reduced and quality is improved.	Entries on the Contaminated Land Register
13. Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced.	- Household waste breakdown (recycling, composting, sent to landfill, etc.) - Collected waste for Rother breakdown

SA objective	Suggested indicators / monitoring tools
14. The risk of pollution to water is reduced and water quality is improved.	• Change in ecological status of water bodies • Bathing water classification
15. Ensure that Parks, gardens and countryside are protected, enhanced and made more accessible.	• CIL allocated to parks and open space • Planning obligations for parks and open space • Loss of public open space • Loss of Grade I, II and III agricultural lands • Total area of the High Weald National Landscape
16. Economic performance is improved.	• Net gain/loss of employment floorspace • Net gain/loss of floorspace for main town centre uses • Labour market profile data (NOMIS)
17. There are high and stable levels of employment and diverse employment opportunities for all.	• Unemployment rate • Economic activity rates • Claimant counts (Job Seekers' Allowance / Universal Credit)
18. Levels of poverty and social exclusion are reduced, and the deprivation gap is closed in the more deprived areas.	• Indices of Multiple Deprivation
19. Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve.	• Planning obligations for skills and training • Planning permissions for new education facilities • Vocational and other qualifications data
20. Road congestion levels are reduced and there is less car dependency and greater travel choice.	• Car ownership data • Percentage of trips made by walking and cycling • Percentage of trips made by public transport • Percentage of people travelling to work by car • Delivery of projects in Local Walking and Cycling Implementation Plan

Chapter 8:

Appendices

This section includes supporting information for the Sustainability Appraisal Report, which is set out in the following appendices:

Appendix 1:

Regulatory requirements

Appendix 2:

Key plans, policies and programmes

Appendix 3:

Sustainability issues for Rother and baseline information

Appendix 4:

Tables for the SA of the thematic topic area policy alternatives

Appendix 5:

Pro-forma for the SA of the site allocation policies and alternatives

Appendix 6:

SA of the rejected (excluded) HELAA sites

Appendix 7:

Representations on the Scoping and Interim SA Reports

Appendix 1: Regulatory requirements

The SEA Regulations set out a legal assessment process that must be followed. In light of this, the table below sets out the relevant requirements of the SEA Regulations and explains how these have been satisfied (or will be satisfied) through the Local Plan SA Report.

SEA Regulations Requirements Checklist (Source: National Planning Practice Guidance)³⁸

Strategic Environmental Assessment Regulations requirements checklist	Where met – Interim SA Reports	Where met – Regulation 19 SA Report
Preparation of environmental report (regulation 12) Preparation of an environmental report that identifies describes and evaluates the likely significant effects on the environment of implementing the plan or programme and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme (regulation 12(2)). The report shall include such of the information referred to in Schedule 2 as may reasonably be required, taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in the process to avoid duplication of the assessment (regulation 12(3)). Information may be provided by reference to relevant information obtained at other levels of decision-making or through other EU legislation (regulation 12 (4)). When deciding on the scope and level of detail of information to be included in the environmental report the consultation bodies should be consulted.	Rother Local Plan Sustainability Appraisal Scoping Report (January 2021) – the consultation bodies were consulted and responded to the Scoping Report. Consideration of reasonable alternatives for policies is included in the Interim SA Report (2024). Further consideration of reasonable alternatives for policies included in this Interim SA Report (2026). This includes the development strategy, site allocations, and development densities – as set out in Chapters 4, 5 and 6.	Consideration of reasonable alternatives for policy approaches, and appraisal of likely significant effects of the plan, set out in Chapter 4 (Development strategy and growth scenarios), Chapter 5 (thematic policy topic areas), Chapter 6 (site allocations and site options), and Chapter 7 (cumulative effects). Appendix 4 also includes tables of SA of policy alternatives at early stage of plan process. Appendix 6 includes SA of the ‘rejected’ proposed development sites. Appendix 7 sets out record of consultation with the environmental bodies throughout the SA process.
The information referred to in Schedule 2 is: a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	Rother Local Plan Sustainability Appraisal Scoping Report (January 2021) and updated by the Interim SA Report (2024) (Chapters 2, and Appendix 1). Further updated in this Interim SA Report (2026) – Chapters 1 and 2.	Paragraphs 1.27 and 1.28 set out key aims of the Local Plan. Appendix 2 (Key plans, policies and programmes) provides further details on relationship with other plans.

³⁸ National Planning Practice Guidance, Paragraph: 004 Reference ID: 11-004-20150209.

Strategic Environmental Assessment Regulations requirements checklist	Where met – Interim SA Reports	Where met – Regulation 19 SA Report
		Contents and aims of plan also detailed throughout the SA report for the assessment of policy proposals.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Rother Local Plan Sustainability Appraisal Scoping Report (January 2021) and updated by the Interim SA Report (2024) – Chapter 3 and Appendix 2. Further updated by the Interim SA Report (2026) – Chapter 2.	Appendix 3 (Sustainability baseline) provides a summary of SA Scoping Report and other baseline information.
c) The environment characteristics of areas likely to be significantly affected.	Rother Local Plan Sustainability Appraisal Scoping Report (January 2021). Updated by the Interim SA Report (2024) - Chapter 3 and Appendix 2 and Interim SA Report (2026) Chapters 1 and 2.	Chapter 2 (Sustainability context for Rother). Appendix 3 (Sustainability baseline) provides a summary of SA Scoping Report and other baseline information.
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 2009/147/EC (Conservation of Wild Birds) and 92/43/EEC (Habitats Directive).	Rother Local Plan Sustainability Appraisal Scoping Report (January 2021). Updated by the Interim SA Report (2024) - Chapter 2, and Appendix 1.	Chapter 2 (Sustainability context for Rother) and Appendix 2 (Key plans, policies and programmes). Appendix 3 (Sustainability baseline) provides a summary of SA Scoping Report and other baseline information.
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	Rother Local Plan Sustainability Appraisal Scoping Report (January 2021). Updated by the Interim SA Report (2024) - Chapter 3 and Appendix 2. Further updated by the Interim SA Report (2026) – Chapter 2.	Chapter 2 (Sustainability context for Rother) and Appendix 2 (Key plans, policies and programmes).
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscapes and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short,	As set out in Interim SA Report (2024) - Chapter 5. Appendices 3 and 4. As set out in Interim SA Report (2026) – Chapters 4 and 5.	Appraisal of likely significant effects of the plan, set out in Chapter 4 (Development strategy and growth scenarios), Chapter 5 (thematic policy topic areas), Chapter 6 (site allocations and site options), and Chapter 7 (cumulative effects). Appendix 4 also includes tables of SA of policy alternatives at early stage

Strategic Environmental Assessment Regulations requirements checklist	Where met – Interim SA Reports	Where met – Regulation 19 SA Report
medium and long-term permanent and temporary, positive and negative effects.		of plan process. Appendix 6 includes SA of the 'rejected' proposed development sites.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	As set out in Interim SA Report (2024) - Chapter 5. Appendices 3 and 4. As set out in Interim SA Report (2026) – Chapters 4 and 5.	Measures set out alongside the appraisal of likely significant effects of the plan, set out in Chapter 4 (Development strategy and growth scenarios), Chapter 5 (thematic policy topic areas), Chapter 6 (site allocations and site options).
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	As set out in Interim SA Report (2024) - Chapters 4 and 5, and Appendices 3 and 4. As set out in Interim SA Report (2026) – Chapters 2, 3, 4 and 5, as Appendix (SA site assessment methodology).	Chapter 3 (Method) and Appendix 5 (Template for assessment of site allocations and alternatives). Reasons for selecting the plan and policies are set out in Chapter 4, Chapter 6 and Chapter 7.
i) A description of measures envisaged concerning monitoring in accordance with regulation 17.	Interim SA Report (2024 - Chapter 6. Interim SA Report (2026) – Chapter 3.	Chapter 7 includes a monitoring framework.
j) A non-technical summary of the information provided under the above headings.	Non-Technical Summary to this report.	Non-technical summary to this SA report.
Consultation procedures (regulation 13) As soon as reasonably practicable after their preparation, the draft plan or programme and environmental report shall be sent to the consultation bodies and brought to the attention of the public, who should be invited to express their opinion. The period within which opinions must be sent must be of such length as will ensure an effective opportunity to express their opinion.	Undertaken as part of the Regulation 18 stage public consultation on the draft Rother Local Plan, and in accordance with the Council's adopted Statement of Community Involvement.	Undertaken as part of the Regulation 18 stage public consultation on the draft Rother Local Plan, and in accordance with the Council's adopted Statement of Community Involvement.
Information as to adoption of plan or programme (regulation 16) As soon as reasonably practicable after the plan or programme is adopted, the consultation bodies, the public and the Secretary of State (who will inform any other EU Member States consulted) shall be informed and the following made available: • the plan or programme adopted	These actions are post-adoption procedures which will be carried out, subject to the Local Plan being found sound and formally adopted by the Council.	These actions are post-adoption procedures which will be carried out, subject to the Local Plan being found sound and formally adopted by the Council.

Strategic Environmental Assessment Regulations requirements checklist	Where met – Interim SA Reports	Where met – Regulation 19 SA Report
- the environmental report - a statement summarising: (a) how environmental considerations have been integrated into the plan or programme; (b) how the environmental report has been taken into account; (c) how opinions expressed in response to: (i) the invitation referred to in regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), (d) how the results of any consultations entered into under regulation 14(4) have been taken into account; (e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and (f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme. (regulation 16)		
Monitoring of implementation of plans or programmes (regulation 17) Monitoring of significant environmental effects of the plan's or programme's implementation with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action (regulation 17 (1)). Monitoring arrangements may comprise or include arrangements established for other purposes (regulation 17 (2)).	Monitoring framework will be established through the preparation of the Local Plan and associated SA Report. Monitoring will be undertaken following adoption of the plan, and carried out annually through the preparation and publication of the Council's Authority Monitoring Report.	Chapter 7 includes a monitoring framework.

Appendix 2:

Key plans, policies and programmes

This Appendix sets out the key plans, policies and programmes that are considered to have a relationship with the Rother Local Plan.

It is noted that the Rother Local Plan will, subject to its adoption, form part of the statutory Development Plan for the district. The Local Plan includes key objectives and overarching principles (in the context of delivering sustainable development consistent with national planning policy), together with planning policies to help give effect to these.

The planning policies include a spatial development strategy for the district over the plan period 2025-2042; thematic topic based policies covering the following main areas: delivering new homes, a thriving local economy, green to the core, live well locally, natural and historic environment; area-based policies for the five identified geographic sub-areas of the district; and site allocation policies which set out land-use principles and development requirements for specific sites.

Key plan, policy or programme	Summary of main objectives and relationship to the Local Plan
Overarching & crosscutting <i>Main SEA Regulations categories: biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage, landscape</i>	
International • United Nations Declaration on Sustainable Development (Johannesburg Declaration) (2002) • Environmental Assessment of Plans and Programmes (SEA) Directive (2001/42/EC) • European Sustainable Development Strategy (2006) • Transforming Our World: The 2030 Agenda for Sustainable Development (2015) National • Planning and Infrastructure Act 2026 • National Planning Policy Framework (2024) and Draft NPPF 2025: Plan-making and national decision-making policies (2025), and Planning Practice Guidance • The Environmental Improvement Plan 2023 (First Revision of the 25-Year Environment Plan) (2023) and A Green Future: A 25-Year Plan to Improve the Environment (2018)	Overarching legislative and policy framework for relevant authorities to contribute to sustainable development, environmental protection and improvement, including climate change adaptation and mitigation. International declarations and European legislation is transposed into UK law, with key requirements set out for local planning authorities during the preparation and implementation of development plans. This includes the carrying out of Strategic Environmental Assessment, Sustainability Appraisal and Habitats Regulations Assessment. The National Planning Policy Framework sets out the Government's approach to delivering sustainable development in England, with policies for plan-making and decision-taking that cover or relate to the breadth of the SEA Regulations categories. Locally, East Sussex County

Key plan, policy or programme	Summary of main objectives and relationship to the Local Plan
• Levelling Up and Regeneration Act 2023 • Environment Act 2021 • UK Marine Policy Statement 2019 • The Flood and Water Management Act (2010) • Localism Act 2011 • Town and Country Planning (Local Planning) Regulations 2012 • Climate Change Act (2008) • Planning and Energy Act (2008) • Natural Environment and Rural Communities Act 2006 • Planning and Compulsory Purchase Act 2004 • Strategic Environmental Assessment Regulations 2004 Sub-national and local • East Sussex Climate Emergency Plan 2025-2030 (2024) • East Sussex Climate Change Risk and Vulnerability Assessment (2024) • Rother Climate Strategy and Climate Action Plan 2023-2026 (2023) • Environment Strategy for East Sussex (2020) • Draft Environment Strategy for Rother 2020 – 2030 (2020)	Council and Rother District Council have prepared a suite of strategic documents to support the wider national and international objectives on sustainable development and climate change.
Air quality <i>Main SEA Regulations categories: air</i>	
International • EU Air Quality Framework directive on ambient air quality (2008/50/EC, 2004/107/EC, 2015/1480/EC) National • The Air Quality Strategy for England (2023) • Environment Act 2021 • Air Quality (England) Regulations 2000 • Air Quality (Amendment of Domestic Regulations) (EU Exit) Regulations 2019 • Clean Air Strategy (2019) • Air Quality Standard Regulations 2016 Sub-national and local • Sussex Air Quality Partnership (including Air Quality Monitoring) • Air Quality and Emissions Mitigation Guidance for Sussex (2021) • East Sussex Local Transport Plan 4 (LTP4) (2024)	A legislative framework for relevant authorities, including local authorities, to monitor and manage air quality. This includes air quality standards and/or measures that must be achieved. The legal requirements are supplemented by strategic frameworks for multi-agency cooperation to achieve air quality objectives, recognising the wide range of factors that impact on air quality. Locally, Rother is part of the Sussex Air Quality Partnership which seeks to assist partners to comply with their statutory air quality management duties and contribute to improving air quality and health in Sussex. The LTP4 is noteworthy for dealing with air quality issues associated with transport, particularly vehicles.

Key plan, policy or programme	Summary of main objectives and relationship to the Local Plan
Biodiversity <i>Main SEA Regulations categories: biodiversity, fauna, flora, water</i>	
International - Environmental Assessment of Plans and Programmes (SEA) Directive (2001/42/EC) - EU Directive on the conservation of wild birds (79/409/EEC amended to 2009/147/EEC) - EU Directive on the conservation of natural habitats and of wild fauna and flora (92/43/EEC) - International Convention on Wetlands (Ramsar Convention) (1976) National - Biodiversity Gain (Town and Country Planning) (Amendments and Transitional Provisions) (England) Regulations 2026 - Blueprint for Halting and Reversing Biodiversity Loss: the UK's National Biodiversity Strategy and Action Plan for 2030 (2024) - UK Environmental Improvement Plan (2023) (update to A Green Future: Our 25-Year Plan to Improve the Environment 2018) - Environment Act 2021 - Natural Environment and Rural Communities Act 2006 - Environmental Assessment of Plans and Programmes Regulations 2004 - Wildlife and Countryside Act 1981 (as amended) Subnational and local - Draft Local Nature Recovery Strategy for East Sussex and Brighton & Hove (2025) - Environment Strategy for East Sussex (2020) - Draft Environment Strategy for Rother 2020 – 2030 (2020) - Dungeness Complex Strategic Access and Recreation Management Strategy (SARMS) (2017) - A Living Landscape for the South East (2006) - South East River Basin District River Basin Management Plan (2009)	A legislative framework for the conservation and enhancement of biodiversity, including the identification and legal parameters for internationally and nationally protected habitats and species. European requirements on Strategic Environmental Assessment and Habitats Regulations Assessment are transposed in UK law. The Environment Act 2021 makes many elements of the 25-Year Environment Plan statutory through legal requirements to restore natural habitats, increase biodiversity and halt the decline in species by 2030. This also introduces a biodiversity duty for local authorities and includes mandatory provisions for Biodiversity Net Gain on new development. Locally and regionally, key plans and strategies help give effect to the higher-level strategic framework, with the Draft LNRS for East Sussex and Brighton & Hove to update the previous Biodiversity Action Plan, setting an updated strategic framework for biodiversity protection and enhancement.
Climate change adaptation and mitigation <i>Main SEA Regulations categories: climatic factors</i>	
International United Nations Framework Convention on Climate Change, Paris Agreement (2016)	A legislative framework for climate change adaptation and mitigation, emanating from and building on international

Key plan, policy or programme	Summary of main objectives and relationship to the Local Plan
- Transforming Our World: The 2030 Agenda for Sustainable Development (2015) - European Sustainable Development Strategy (2006) National - Overarching National Policy Statement for Energy EN-1 (2025) - Clean Power 2030 Action Plan (2024) - Third National Adaptation Programme (NAP3) (2023) - Powering Up Britain: Net Zero Growth Plan (2023) - Climate Change Act (2008) - The Flood and Water Management Act (2010) - Planning and Energy Act (2008) Local - East Sussex Climate Emergency Plan 2025-2030 (2024) - East Sussex Climate Change Risk and Vulnerability Assessment (2024) - Rother Climate Strategy and Climate Action Plan 2023-2026 (2023) - Environment Strategy for East Sussex (2020) - Draft Environment Strategy for Rother 2020 – 2030 (2020)	agreements, including the Paris Agreement 2016, to bring global temperatures below 2 degrees Celsius above pre-industrial levels. Acknowledges the global nature of climate change and need for a multi-agency and international approach to it, whilst focusing on more localised actions. Nationally, this includes the Government's setting of targets for greenhouse gas emission reduction towards net zero carbon, along with strategic approaches to adaptation and mitigation, both in terms of land-use planning and investment in infrastructure. Locally, the Rother Climate Strategy focusses on climate action on five key areas: buildings and energy efficiency; transport and resource consumption and waste; biodiversity and land-use; and energy generation.
Economy and skills <i>Main SEA Regulations categories: population, human health</i>	
National - The UK Modern Industrial Strategy (2025) - Local Growth White Paper (2010) - Rural White Paper 2000 (Our Countryside: the future – A fair deal for rural England) (2000) Sub-national and local - Get Sussex Working Plan (2024) - East Sussex Economic Prosperity Strategy (2024) - Rother Economic Recovery Action Plan (2024) - East Sussex Economic Recovery Plan (2020)	A strategic policy framework to support sustainable economic development, at national, regional and local levels. The UK Modern Industrial Strategy sets out the Government's priorities for economic growth and inward investment, including support for emerging industrial sectors and transition to the green economy. It also sets out the need to remove planning barriers to enable infrastructure delivery to support economic development. Locally, key plans and strategies focus on the challenges facing East Sussex, particularly following the health pandemic and persistent economic challenges facing coastal areas. This includes objectives around education and skills development to support higher value employment sectors and business productivity, whilst recognising niche strengths, such as leisure and tourism.
Heritage	

Key plan, policy or programme	Summary of main objectives and relationship to the Local Plan
<i>Main SEA Regulations categories: cultural heritage</i>	
International - European Convention for the Protection of the Architectural Heritage of Europe (1985) - Valletta Treaty (1992) formerly the European Convention on the Protection of the Archaeological Heritage (Revisited) National - The UK Heritage Statement 2017 - Managing Local Authority Heritage Assets, Historic England Advice for Local Authorities (2017) - Sustainability Appraisal and Strategic Environmental Assessment, Historic England Advice Note 8 (2016) - The Government's Statement on the Historic Environment for England 2010 - Planning (Listed Buildings & Conservation Areas) Act 1990 - Ancient Monuments & Archaeological Areas Act 1979 - Historic Buildings and Ancient Monuments Act 1953 Sub-national and local - The High Weald AONB Management Plan 2024–2029 (2024) - East Sussex Historic Environment Record - Rother Conservation Area Appraisals	A legislative framework for the conservation and enhancement of heritage assets, including archaeology. This includes provisions to record and preserve heritage assets and embed conservation considerations into planning systems. Nationally, legislation and the NPPF help give effect to this framework, including provisions for the conservation of heritage assets through the plan-making and development management process. The UK Heritage Statement sets out the Government's vision and strategy for heritage, and Historic England has published guidance documents to assist local authorities. Locally, the Historic Environment Record is maintained by East Sussex County Council, and there are Conservation Area Appraisals to assist with the management of the 10 Conservation Areas in Rother district.
Land and water quality	
<i>Main SEA Regulations categories: biodiversity, water, soil, human health</i>	
International - European Drinking Water Directive 2020/2184 - European Directive 2026/805 - European Waste Framework Directive 2008/98/EC - European Water Framework Directive 2000/60/EC - European Landfill Directive 1999/31/EC National - The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 - National Planning Policy for Waste (2014) - Safeguarding Our Soils: A Strategy for England (2009)	A legislative and policy framework for the protection and enhancement of land and water quality. For Rother, key areas of interest include EU Directive on the water quality and seeking to ensure the good ecological status of water bodies, as well as protecting the quality of land and soils, including through opportunities for the remediation of brownfield or previously developed land. Sustainable waste management is another key area (seeking reductions in the amount of waste sent to landfill and increasing the re-use and recycling of materials) and this is dealt with principally at the sub-national level through the relevant Minerals and Waste Local Plan.

Key plan, policy or programme	Summary of main objectives and relationship to the Local Plan
- Contaminated Land (England) Regulations 2006 - Environmental Protection Act 1990 - Control of Pollution Act 1974 Sub-national and local - East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plans, including - Revised Policies (2021) - South East River Basin District Management Plan (2022)	
Natural landscape <i>Main SEA Regulations categories: landscape</i>	
International - European Landscape Convention 2002 National - Protected Landscapes and Outcomes Framework (2024) - Levelling Up and Regeneration Act (LURA) 2023 - Countryside and Rights of Way Act (2000) - Wildlife and Countryside Act 1981 (as amended) Sub-national and local - High Weald AONB Management Plan 2024-2029 (2024) - Environment Strategy for East Sussex (2020) - Draft Environment Strategy for Rother 2020 – 2030 (2020)	A legislative framework for landscape protection, management and planning. The Countryside and Rights of Way Act 2000 requires local authorities with land in an AONB to prepare and publish an up-to-date plan which ‘formulates their policy for the management of the area and for the carrying out of their functions in relation to it’. The LURA, Section 245, introduced the Protected Landscapes Duty, which requires relevant authorities to ‘seek to further’ the statutory purposes of protected landscapes, which include National Landscapes (known also as Areas of Outstanding Natural Beauty). Locally, the High Weald AONB Management Plan is an important strategic document as some 80% of Rother is covered by it. The management plan sets out a vision for the High Weald and principles for its future management, together with an investment strategy.
Population, health and wellbeing <i>Main SEA Regulations categories: population, human health</i>	
National - Delivering a Decade of Renewal for Social and Affordable housing, MHCLG 2025 - Homes England Strategic Plan 2025-2030 - Health Equity for Health Security Strategy 2023-2026 - Health and Social Care Act 2012 - Education Act 2011 - Equality Act 2010	A legislative framework together with key strategic plans for health and wellbeing. This cuts across a number of policy areas, mainly covering social sustainability objectives, with a particular focus on access to housing, health and social care, education and physical activity / recreation, which are key determinants of health and wellbeing and deprivation. The Equality Act sets out legal responsibilities

Key plan, policy or programme	Summary of main objectives and relationship to the Local Plan
Sub-national and local • Rother Homelessness and Rough Sleeping Strategy 2025-2030 • Rother Housing Development Strategy 2025 • East Sussex Excellence for All Vision 2024-2030 • East Sussex School Organisation Plan 2025-2029 • Hastings and Rother Playing Pitches and Built Facilities Strategy 2023-2039 • Get active: A Strategy for the Future of Sport and Physical Activity • Improving Lives Together – Our ambition for a healthier East Sussex (2022) • Healthy Lives Healthy People: East Sussex Health and Wellbeing Board Strategy (2022) • Pride of Place – Sustainable Community Strategy for East Sussex 2008-2026 (Revised) (2014) • East Sussex Joint Strategic Needs Assessment (periodically updated)	for public bodies to have regard to those groups with protected characteristics.
Transport and movement <i>Main SEA Regulations categories: population, climatic factors</i>	
National • Better Connected: A Strategy for Integrated Transport (2026) • Network Rail 5-Year Plan, Control Period 7 2024-2029 (2023) and Railways High Level Output Specification (2022) • Department for Transport Circular 01/2022: Strategic Road Network and Delivery of Sustainable Transport (2022) • Future of Freight Plan: Policy Paper (2022) • UK Transport Decarbonisation Plan – Decarbonising Transport: A better, green Britain (2021) • National Bus Strategy (2021) Sub-national and local • Transport Strategy for the South East and Strategic Investment Plan (2025) • East Sussex Local Transport Plan 4 (LTP4) (2024) • Draft East Sussex Local Cycling and Walking Infrastructure Plan (LCWIP) (2026) and LCWIP (2020)	A strategic policy and investment framework for transport and movement at national, regional and local levels. This focusses principally on strategic connectivity and links to key urban areas and transport hubs/gateways; improved connectivity at the sub-regional and local level, including better integration of transport with land-use planning; decarbonisation of the transport system to support net zero carbon and other environmental objectives; and network resilience. Circular 01/2022 and the NPPF are noteworthy for the shift to a ‘vision-led’ approach to transport planning and mitigation, away from the ‘predict and provide’ model which has historically been applied. Locally, the Transport Strategy for the South East helps give effect to the national priorities in the regional context, with the East Sussex LTP4 and the LWCIP providing a clear direction and investment strategy for Rother in terms of enabling and supporting sustainable transport and

Key plan, policy or programme	Summary of main objectives and relationship to the Local Plan
	decarbonisation, including transport modal shift away from car-use.
Water and coastal management <i>Main SEA Regulations categories: water, biodiversity, human health, climatic factors</i>	
International • European Drinking Water Directive 2020/2184 • European Directive 2026/805 • European Water Framework Directive 2000/60/EC • European Environmental Quality Standards Directive 2008/105/EC • European Groundwater Directive 2006/118/EC National • National Framework for Water Resource 2025: Water for Growth, Nature and a Resilient Future (2025) • UK Marine Policy Statement 2019 • The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 • Marine Policy Statement 2011 • Flood and Water Management Act 2010 • Marine and Coastal Access Act 2009 Sub-national and local • Southern Water - Draft Water Resources Management Plan (2024) and WRMP 2019 • South East Water – Water Resources Management Plan (2024) • South East River Basin District Management Plan (2022) • South Inshore and Offshore Marine Plan (2018) • Rother Strategic Flood Risk Assessment (2026) • Drainage and Wastewater Management Plans (DWMPs)	Legislative and policy framework to protect inland surface waters, transitional waters, coastal waters and groundwater, together with other matters such as water quality, supply and flood risk management. The Water Framework Directive requires member authorities to protect and, where necessary, restore water bodies in order to reach good status, and to prevent deterioration. It sets the legislative basis for river basin management plans, which set out how stakeholders, including water companies and local communities, can help improve the quality of the water environment. Sub-nationally and locally, the South Marine Plan introduces a strategic approach to planning within the inshore and offshore waters between Folkestone in Kent and the river Dart in Devon. It provides a clear, evidence-based approach to inform decision-making by marine users and regulators on where activities might take place within the marine plan area. The strategic plans of relevant water companies set out priorities and investment strategies to support sustainable water management.

Appendix 3: Sustainability baseline

Introduction

1. This Appendix provides a summary of the sustainability 'baseline' situation for Rother district. It sets out key features and characteristics of the district and its population, together with trend-based information. The baseline covers environmental, economic and social topic areas. The baseline has underpinned the creation of the SA framework (set out in Chapter 2 of this SA Report), which has been used to assess the likely effects of the implementation of the Local Plan, and reasonable alternatives, during its preparation.
2. The baseline was initially set out in the Sustainability Appraisal / Strategic Environmental Assessment Scoping Report (2021), which should be referred to for further information, and has been subject to review and updating during the SA process as new evidence has come to light.³⁹

Population and demographic change

3. Rother's population was estimated at 94,860 in 2023, representing modest growth relative to regional and national trends. Population growth between 2011 and 2021 was only 2.8%, significantly below growth across the South East (7.5%) and England (6.6%). Approximately half of all residents live within Bexhill-on-Sea, while the remainder are distributed across the district's rural settlements.
4. One of the defining characteristics of the district is its ageing population. The median age increased from 50 to 53 between 2011 and 2021, making Rother the oldest district in the South East. Residents aged 65 and over now account for around one-third of the

population, whilst only 15% of residents are under 16 years of age. Growth has been particularly concentrated amongst those aged 65 to 74, while the number of residents aged 35 to 49 has fallen substantially. Population projections indicate that ageing will continue, particularly within Bexhill.

Health and wellbeing

5. Health outcomes are generally positive. Life expectancy stands at 82-years overall, above the national average. Female life expectancy is 86-years, and male life expectancy is 83-years. However, the ageing population creates increasing pressures on health and care services. Dementia is the leading cause of death, while lung cancer and ischaemic heart disease are the principal causes of premature mortality.
6. Adult obesity has increased significantly, with almost 69% of adults classified as overweight or obese. This exceeds both regional and national averages. Whilst childhood obesity rates have improved, wider health indicators suggest ongoing concern regarding physical activity levels and wider lifestyle-related health outcomes.
7. Although personal wellbeing scores for happiness and life satisfaction remain relatively strong, anxiety levels are above national averages and admissions to hospital for self-harm are among the highest in the South East. Physical inactivity amongst both adults and children is also higher than many comparable local authorities.
8. There are currently no Air Quality Management Areas in the district.

Deprivation

9. Whilst Rother is often perceived as an affluent rural district, the evidence reveals significant pockets of deprivation. The district is ranked within the 40% most deprived local authorities in England. Concentrations of

³⁹ The baseline summary has been collated using the Local Plan evidence base, as well as publicly available information prepared by Government bodies and

external organisations. The summary also draws on information prepared by the Council including the State of Rother Report (2025).

deprivation occur in Sidley, central Bexhill, Eastern Rother and parts of Rye.

10. Levels of child poverty are a particular concern. Nearly one in five children live in low-income households, considerably above the South East average. Financial vulnerability is also reflected in continuing reliance on income support and increasing pressures associated with fuel poverty. Around 12.5% of households are classed as fuel poor, while energy efficiency performance remains below national averages.

Employment, skills and earnings

11. The local labour market is characterised by relatively low unemployment but also lower wages and lower skills attainment than regional and national averages. Unemployment benefit claimants represent 3.2% of residents, one of the lowest rates in East Sussex. However, overall employment rates have declined in recent years, and economic inactivity remains relatively high.
12. A notable feature of the Rother economy is its high level of self-employment. Almost 17% of working-age residents are self-employed, considerably above the national average. Part-time employment is also more common than nationally.
13. Average resident earnings remain significantly below England and South East averages, with median annual earnings of £35,320 in 2024. Educational attainment is similarly lower, with only 37.8% of working-age residents holding degree-level qualifications compared with 43.2% nationally. Around 11% of working-age residents have no formal qualifications.

Business profile and economic structure

14. Rother's economy is heavily dominated by small businesses. Approximately 4,600 businesses operate within the district, with 88% employing fewer than ten staff. Large employers are comparatively rare.

15. The economic base is concentrated around retail, construction, tourism, accommodation and food services, agriculture, and financial services. Retail employment experienced particularly strong growth between 2020 and 2021. However, sectors associated with higher productivity and innovation, such as information and communication technology, professional services and advanced manufacturing, remain underrepresented. Only 3.1% of jobs are within the information and communications sector, compared with 5% nationally.

16. Tourism remains a major contributor to the local economy. The sector supports around 21.6% of employment and generates approximately £245 million annually through more than 5.6 million visitor trips each year. Day visitors dominate tourism activity.

Housing

17. Housing affordability is one of the most significant issues locally. While social rented accommodation accounts for just 10.2% of housing stock, affordability challenges persist and are widening, mirroring national trends. House prices remain high relative to local incomes, with median house prices more than eleven times median workplace earnings.
18. In terms of household composition, the 2021 census shows that Rother has a higher proportion of one-person households aged 66+ (20%) compared to England (13%), emphasising the heavily aged profile of the population. It also has a far higher proportion of households categorised as 'single family compared to England on average.
19. The 2021 figures show that Rother has a higher proportion of owner-occupied dwellings (72.7%) compared to the national average (61.3%), and a lower proportion of social rented dwellings. The proportion of private rented dwellings in Rother is also slightly less than the national average. Although lower than the national average, private rented housing represents a

significant portion of the market in Rother, particularly in Bexhill and other smaller urban areas of the district

20. Housing quality presents further challenges. Around 20% of dwellings fail to meet the Decent Homes Standard, with privately rented and social housing particularly affected. The district has one of the highest proportions of non-decent housing stock in the South East.

Community Safety

21. The district remains relatively safe when compared with other non-metropolitan local authorities. However, crime levels have risen in recent years. Theft offences increased by almost 19% during 2024 and overall recorded crime rose to more than 65 offences per 1,000 residents. Shoplifting emerged as one of the most significant growth areas. Violence against the person, criminal damage and public order offences continue to account for a substantial proportion of recorded crime. [

Climate change and carbon emissions

22. District-wide greenhouse gas emissions have reduced significantly since 2005. Emissions in 2022 were 411.2 ktCO₂e, representing a substantial reduction compared with both 2021 and pre-pandemic levels. Transport remains the largest source of emissions, followed by domestic energy use and industry. Most emission reductions have been driven by national decarbonisation of the electricity grid. Nonetheless, climate adaptation and mitigation remain central challenges for the district.

Transport and accessibility

23. Rother District benefits from a combination of rail and bus services that provide local and regional connectivity, although service provision is concentrated in the main towns of Bexhill, Battle and Rye, with more limited accessibility in rural areas.
24. The district's rail network is served principally by the East Coast and Hastings lines,

providing connections to Hastings, Eastbourne, Brighton, Ashford International, Tunbridge Wells and London. Key stations at Bexhill, Battle, Rye and Crowhurst support commuter, leisure and tourism travel, although facilities and accessibility standards vary between locations. While investment has improved accessibility at some stations, gaps remain across parts of the network.

25. Bus services provide links between residential areas, town centres, employment locations, schools, healthcare facilities and transport interchanges. However, evidence from the East Sussex Bus Service Improvement Plan identifies uneven service provision, with more frequent services on key corridors such as the A259 and between Bexhill and Hastings, but more limited coverage in rural areas and outside peak travel periods. The Plan also highlights opportunities to improve integration between bus, rail and active travel networks to support more sustainable multi-modal journeys.

26. Rother's rural nature influences access to employment, education, healthcare and everyday services. Residents generally experience longer journey times than regional and national averages, contributing to high levels of car ownership. Broadband and mobile connectivity have improved but remain below South East averages, particularly in rural areas.

Heritage

27. Rother district has a rich heritage environment and a valuable and extensive historic building stock, including as it does the historic market towns of Battle and Rye, the Victorian and Edwardian seaside town of Bexhill-on-Sea, the planned medieval town of Winchelsea, and a host of picturesque villages and hamlets. The historic built environment has a high level of statutory protection; designated heritage assets include approximately 2,200 Listed Buildings, 10 Conservation Areas, a number of Scheduled Ancient Monuments and Registered Parks and Gardens, and the

‘Historic Battlefield’ at Battle. Many other non-designated heritage assets contribute positively to the physical, historic and socio-cultural character of the district.

Landscape and character

28. Rother district is predominantly rural in nature, with 83% of the district being located within the High Weald Area National Landscape, which is a designated Area of Outstanding Natural Beauty (AONB) and a national asset. The HWNL is characterised by being one of the best surviving, medieval landscapes in Northern Europe. Over a quarter of its land comprises woodland, and it has the highest coverage of ancient woodland of any protected landscape. Main roads and settlements are sited along prominent ridgelines, with a further network of small winding lanes connecting scattered villages, hamlets and farms. The legacy of the early iron industry has resulted in extensive areas of coppice woodland and hammer ponds. Trees and vegetation have different characteristics in high forest, small woods and copses. Historic field boundaries are defined by a network of hedges and assarts.
29. Two predominantly rural areas with important landscape features, lying outside the HWNL, are the Pevensey Levels and Romney Marshes. The Pevensey Levels are a low-lying tract of reclaimed wetland to the west of Bexhill at the western edge of the district that continues into Wealden District. They are typically a flat open landscape with extensively grazed wet meadows, largely windswept with a few trees. Widely spaced roads and isolated small settlements provide a sense of remoteness in this area, which is a priority habitat due to its designation as a Ramsar site and Special Area of Conservation (SAC). The Romney Marshes are located around Rye to the east of the district and continue into Folkestone and Hythe District. This area is typically a flat open agricultural landscape of arable fields and wet

pastureland with distinctive drainage dykes, marshes and notable open skies. The area also comprises habitats of the highest nature conservation value, being designated as a Ramsar, Special Protection Area (SPA) and SAC. There is a sharp contrast between the shingle coast, low lying agricultural land and raised cliffs in this wider area.

Water environment and flood risk

30. Rother’s coastline presents two main coastal typologies; low-lying areas, and cliff top areas. Both are comprised of a variety of soft silts, clay, sand, gravel and other material that is susceptible to erosion and significant movement over time. The natural process of erosion and movement of material has taken place over thousands of years and will continue to shape the coastline. Various schemes of soft and hard defences including groynes, beach replenishment and sea walls have been used to protect settlements along the coast such as Bexhill, Fairlight, Pett Level, Winchelsea Beach, Rye Harbour and Camber.
31. Different forms of flood risk are present across Rother District and arise from a range of sources, with the principal risks being fluvial flooding in the upper catchment, tidal flooding along the coast, and a combination of fluvial and tidal flooding in the lower catchment. Significant flood events have occurred recently, mainly caused by the overtopping of watercourses following prolonged rainfall and tidal storm surges.
32. The River Rother, River Brede and River Tillingham are the main rivers contributing to flood risk, with lower reaches affected by tidal locking, alongside Combe Haven, East Stream and Picknell Green Stream. Key settlements at risk of fluvial flooding include Robertsbridge, Salehurst, Etchingham and Rye, while coastal communities such as Rye Harbour and Camber have experienced tidal flooding in the past due to the overtopping of defences, which have, in recent years, been improved.
33. Surface water flood risk is concentrated along natural flow paths, watercourses, roads and

low-lying areas where water can pond, with additional pressures in coastal locations from high groundwater levels and tide-locking of drainage infrastructure.

34. Although most of the district has a low risk of groundwater flooding, higher risks are present in the marshland areas around Rye Harbour and Camber, with localised perched aquifers also causing flooding issues.
35. Sewer flooding is a notable concern particularly affecting Bexhill on-Sea, Battle, Rye, Robertsbridge and Pett Level, where there is a history of flooding from the Marsham Sewer in periods of wet weather, caused by run-off into the sewer from the Marsham catchment. Reservoir flooding also presents a residual risk from reservoirs within and beyond the district, although no reservoir breach incidents have been recorded in Rother.
36. The South East River Basin District (RBD) Management Plan identifies water management issues in the south-east region, including Rother, and sets legally binding environmental objectives aiming to improve water quality. The Pevensey Levels Hydrological Catchment Area and Fairlight Cove are particular areas of concern for water quality, where pollution from water discharge presents a risk to the integrity of habitats.

Biodiversity

37. There are two areas of internationally important wildlife sites extending into the district.
38. The Pevensey Levels, to the south-west, is designated as a Ramsar site of international importance as a wetland habitat and as a Special Area of Conservation (SAC), comprising grazing marsh, wet grassland, ditches and freshwater wetlands. It is considered one of the most important wetland habitats in the region. The Pevensey Levels National Nature Reserve (NNR) also includes land within Rother.
39. At the other (eastern) end of the district and extending into Folkestone and Hythe district, is the Dungeness Complex of Habitats Sites which are designated for their value for birds, rare species and as wetland habitats.
40. There are many Sites of Special Scientific Interest (SSSI) within the district, protected for their wildlife and natural features. Within the HWNL, some of the key High Weald character features are also designated as Priority Habitats (ghyll woodland, sandstone outcrops, ancient woodland, heathland, wildflower meadows and ponds). There are some 60 Local Wildlife Sites in Rother, together with Local Nature Reserves and Local Geological Sites. These sites have an important role within the district's ecological network.

Appendix 4:

Tables for the SA of the thematic topic area policy alternatives

This Appendix sets out the findings of the Sustainability Appraisal of the options considered for the thematic topic area policies (and policy areas) discussed in Chapter 5 of this SA Report. The Appendix duplicates information included in the Interim SA Report (2024). It has been included here for completeness and to meet the statutory requirements for SA reporting. It shows how the Council considered reasonable alternatives for the thematic topic policy areas during the early Regulation 18 stage of the preparation of the Local Plan, and supplements the information and discussion set out in Chapter 5. The Interim SA Report (2024) may be referred to for further information.

Delivering New Homes

SA Objective / Draft Policies	1A	1B	1C	2A	2B	2C	3A	3B	3C	4A	4B	4C	5A	5B	5C	6A	6B
1. Reduce air pollution from transport and development and improve air quality.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
2. Biodiversity is protected, conserved and enhanced.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
3. The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation)	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
4. Minimise water consumption.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
5. Manage and reduce the risk of flooding (fluvial, tidal and surface water), now and in the future, and increase resilience to the wider effects of climate change.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
6. The risk of coastal erosion is managed and reduced, now and in the future.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
7. The health and well- being of the population is improved and inequalities in health are reduced.	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
8. More opportunities are provided for everyone to in a suitable home to meet their needs.	++	++	++	+	+	++	+	+	++	+	+	++	+	+	++	+	++
9. All sectors of the community have improved accessibility to services, facilities, jobs, and social and cultural opportunities.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
10. Safe and secure environments are created and there is a reduction in crime and fear of crime.	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
11. Historic environment/ townscape is protected, enhanced and made more accessible.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
12. The risk of pollution to land and soils is reduced and quality is improved.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
13. Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
14. The risk of pollution to water is reduced and water quality is improved.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
15. Ensure that Parks, gardens and countryside are protected, enhanced and made more accessible.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
16. Economic performance is improved.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
17. There are high and stable levels of employment and diverse employment opportunities for all.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
18. Levels of poverty and social exclusion are reduced, and the deprivation gap is closed in the more deprived areas.	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
19. Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
20. Road congestion levels are reduced and there is less car dependency and greater travel choice.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
SCORING	5	5	5	4	4	5	4	4	5	4	4	5	4	4	5	4	5

SA Objective / Draft Policies	7A	7B	7C	7D	8A	8B	8C	9A	9B	10A	10B	11A	11B	12A	12B	12C
1. Reduce air pollution from transport and development and improve air quality.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
2. Biodiversity is protected, conserved and enhanced.	o	o	o	o	o	o	o	o	o	o	o	+	+	o	o	o
3. The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation)	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
4. Minimise water consumption.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
5. Manage and reduce the risk of flooding (fluvial, tidal and surface water), now and in the future, and increase resilience to the wider effects of climate change.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
6. The risk of coastal erosion is managed and reduced, now and in the future.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
7. The health and well-being of the population is improved and inequalities in health are reduced.	+	+	+	+	+	+	+	+	+	+	+	++	++	+	+	+
8. More opportunities are provided for everyone to in a suitable home to meet their needs.	+	++	+	++	++	+	++	++	++	++	++	++	++	+	+	+
9. All sectors of the community have improved accessibility to services, facilities, jobs, and social and cultural opportunities.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
10. Safe and secure environments are created and there is a reduction in crime and fear of crime.	+	+	+	+	+	+	+	+	+	+	+	++	++	+	+	+
11. Historic environment/ townscape is protected, enhanced and made more accessible.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
12. The risk of pollution to land and soils is reduced and quality is improved.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
13. Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
14. The risk of pollution to water is reduced and water quality is improved.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
15. Ensure that Parks, gardens and countryside are protected, enhanced and made more accessible.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
16. Economic performance is improved.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
17. There are high and stable levels of employment and diverse employment opportunities for all.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
18. Levels of poverty and social exclusion are reduced, and the deprivation gap is closed in the more deprived areas.	+	+	+	+	o	o	o	o	o	+	o	++	++	o	o	o
19. Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
20. Road congestion levels are reduced and there is less car dependency and greater travel choice.	o	o	o	o	o	o	o	o	o	o	o	-	-	o	o	o
SCORING	4	5	4	5	4	3	4	4	4	5	4	8	8	3	3	3

SA Objective / Draft Policies	13A	13B	14A	14B	15A	15B	16A	16B	17A	17B	18A	18B	18C	19A	19B	20A	20B
1. Reduce air pollution from transport and development and improve air quality.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
2. Biodiversity is protected, conserved and enhanced.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
3. The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation)	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
4. Minimise water consumption.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
5. Manage and reduce the risk of flooding (fluvial, tidal and surface water), now and in the future, and increase resilience to the wider effects of climate change.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
6. The risk of coastal erosion is managed and reduced, now and in the future.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
7. The health and well- being of the population is improved and inequalities in health are reduced.	+	+	+	+	++	+	+	+	++	+	++	++	++	+	+	+	+
8. More opportunities are provided for everyone to in a suitable home to meet their needs.	+	+	+	+	+	+	+	++	++	+	++	++	++	++	++	+	++
9. All sectors of the community have improved accessibility to services, facilities, jobs, and social and cultural opportunities.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
10. Safe and secure environments are created and there is a reduction in crime and fear of crime.	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
11. Historic environment/ townscape is protected, enhanced and made more accessible.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
12. The risk of pollution to land and soils is reduced and quality is improved.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
13. Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
14. The risk of pollution to water is reduced and water quality is improved.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
15. Ensure that Parks, gardens and countryside are protected, enhanced and made more accessible.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
16. Economic performance is improved.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
17. There are high and stable levels of employment and diverse employment opportunities for all.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
18. Levels of poverty and social exclusion are reduced, and the deprivation gap is closed in the more deprived areas.	o	o	o	o	o	o	o	o	+	o	+	+	+	o	o	o	o
19. Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
20. Road congestion levels are reduced and there is less car dependency and greater travel choice.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
SCORING	3	3	3	3	4	3	3	4	6	3	6	6	6	3	3	3	3

SA Objective / Draft Policies	21A	21B	22A	23A	23B	24A	24B	25A	26A	26B	27A	27B	28A	28B	29A	29B
1. Reduce air pollution from transport and development and improve air quality.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
2. Biodiversity is protected, conserved and enhanced.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
3. The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation)	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
4. Minimise water consumption.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
5. Manage and reduce the risk of flooding (fluvial, tidal and surface water), now and in the future, and increase resilience to the wider effects of climate change.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
6. The risk of coastal erosion is managed and reduced, now and in the future.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
7. The health and well- being of the population is improved and inequalities in health are reduced.	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
8. More opportunities are provided for everyone to in a suitable home to meet their needs.	+	+	+	+	+	+	+	+	+	++	++	+	++	+	++	++
9. All sectors of the community have improved accessibility to services, facilities, jobs, and social and cultural opportunities.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
10. Safe and secure environments are created and there is a reduction in crime and fear of crime.	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
11. Historic environment/ townscape is protected, enhanced and made more accessible.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
12. The risk of pollution to land and soils is reduced and quality is improved.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
13. Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
14. The risk of pollution to water is reduced and water quality is improved.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
15. Ensure that Parks, gardens and countryside are protected, enhanced and made more accessible.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
16. Economic performance is improved.	o	o	o	o	+	++	++	++	o	o	o	o	o	o	o	o
17. There are high and stable levels of employment and diverse employment opportunities for all.	o	o	o	o	++	++	++	++	o	o	o	o	o	o	o	o
18. Levels of poverty and social exclusion are reduced, and the deprivation gap is closed in the more deprived areas.	o	o	o	o	o	o	o	o	o	+	+	o	+	o	+	+
19. Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
20. Road congestion levels are reduced and there is less car dependency and greater travel choice.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
SCORING	3	3	3	3	6	7	7	7	3	5	5	3	5	3	5	5

SA Objective / Draft Policies	30A	30B	31A	31B	31C	32A	32B	32C	33A	33B	33C	34A	34B	34C	35A	35B
1. Reduce air pollution from transport and development and improve air quality.	o	o	o	o	o	o	o	o	o	o	o	+	+	+	o	o
2. Biodiversity is protected, conserved and enhanced.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
3. The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation)	o	o	o	o	o	o	o	o	o	o	o	o	o	++	o	o
4. Minimise water consumption.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
5. Manage and reduce the risk of flooding (fluvial, tidal and surface water), now and in the future, and increase resilience to the wider effects of climate change.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
6. The risk of coastal erosion is managed and reduced, now and in the future.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
7. The health and well- being of the population is improved and inequalities in health are reduced.	+	+	+	+	+	++	++	++	+	+	+	+	+	+	o	o
8. More opportunities are provided for everyone to in a suitable home to meet their needs.	++	++	++	++	++	++	o	++	+	+	+	+	+	+	o	o
9. All sectors of the community have improved accessibility to services, facilities, jobs, and social and cultural opportunities.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
10. Safe and secure environments are created and there is a reduction in crime and fear of crime.	+	+	+	+	+	+	+	+	o	o	o	o	o	o	o	o
11. Historic environment/ townscape is protected, enhanced and made more accessible.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
12. The risk of pollution to land and soils is reduced and quality is improved.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
13. Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
14. The risk of pollution to water is reduced and water quality is improved.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
15. Ensure that Parks, gardens and countryside are protected, enhanced and made more accessible.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	-	+
16. Economic performance is improved.	o	o	-	-	-	o	o	o	o	o	o	o	o	o	o	o
17. There are high and stable levels of employment and diverse employment opportunities for all.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
18. Levels of poverty and social exclusion are reduced, and the deprivation gap is closed in the more deprived areas.	+	+	+	+	+	+	+	+	o	o	o	o	o	o	o	o
19. Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
20. Road congestion levels are reduced and there is less car dependency and greater travel choice.	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o
SCORING	5	5	4	4	4	6	4	6	2	2	2	3	3	5	-1	1

SA Objective / Draft Policies	36A	36B	37A	37B	38A	38B	39A	39B
1. Reduce air pollution from transport and development and improve air quality.	o	o	o	o	o	o	o	o
2. Biodiversity is protected, conserved and enhanced.	o	o	o	o	o	o	o	o
3. The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation)	o	o	o	o	o	o	o	o
4. Minimise water consumption.	o	o	o	o	o	o	o	o
5. Manage and reduce the risk of flooding (fluvial, tidal and surface water), now and in the future, and increase resilience to the wider effects of climate change.	o	o	o	o	o	o	-	+
6. The risk of coastal erosion is managed and reduced, now and in the future.	o	o	o	o	o	o	o	o
7. The health and well- being of the population is improved and inequalities in health are reduced.	o	o	o	o	o	o	o	o
8. More opportunities are provided for everyone to in a suitable home to meet their needs.	o	o	o	o	o	o	o	o
9. All sectors of the community have improved accessibility to services, facilities, jobs, and social and cultural opportunities.	o	o	o	o	o	o	o	o
10. Safe and secure environments are created and there is a reduction in crime and fear of crime.	o	o	o	o	o	o	o	o
11. Historic environment/ townscape is protected, enhanced and made more accessible.	-	+	-	+	o	o	o	o
12. The risk of pollution to land and soils is reduced and quality is improved.	o	o	o	o	o	o	o	o
13. Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced.	o	o	o	o	o	o	o	o
14. The risk of pollution to water is reduced and water quality is improved.	o	o	o	o	o	o	o	o
15. Ensure that Parks, gardens and countryside are protected, enhanced and made more accessible.	-	+	-	+	-	+	-	+
16. Economic performance is improved.	o	o	o	o	o	o	o	o
17. There are high and stable levels of employment and diverse employment opportunities for all.	o	o	o	o	o	o	o	o
18. Levels of poverty and social exclusion are reduced, and the deprivation gap is closed in the more deprived areas.	o	o	o	o	o	o	o	o
19. Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve.	o	o	o	o	o	o	o	o
20. Road congestion levels are reduced and there is less car dependency and greater travel choice.	o	o	o	o	o	o	o	o
SCORING	-2	2	-2	2	-1	2	-1	2

Policy Options	Does this have a significant effect on the SA objective(s), whether positive or negative? (See also the baseline indicators and prompt question)	What is the likely Impact?	Is this a temporary or permanent Impact?	Is this a short term or long term impact?	Are there synergies between other policies (or options) which might amplify the effect?	Commentary/Notes (Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score)
1A	Yes, positive overall in relation to housing objectives, neutral in relation to others	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified.	Not carried forward – Policy requirements in terms of percentage are not viable at this time, although it scores equally on sustainability grounds to other options
1B	Yes, positive overall in relation to housing objectives, neutral in relation to others	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified.	Not carried forward – Policy requirements in terms of percentage are not viable at this time, although it scores equally on sustainability grounds to other options
1C	Yes, positive overall in relation to housing objectives, neutral in relation to others	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified. Greater impacts will be felt as this is the most appropriate option to be included in the proposed policy.	Policy approach to be carried forward together with Policy Option 2 and 3 to form one policy (HOU2) - Further viability evidence is needed to inform the detail of the new policy. Subject to this, this approach is recommended and provides a strong long term positive impact which is amplified by other housing policies in the Local Plan.
2A	Yes, positive overall in relation to housing objectives, neutral in relation to others	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified.	Not carried forward - This would not reflect up to date evidence in the HEDNA (2024) and would not take account of First Homes, scores lower than Option 2C on sustainability grounds
2B	Yes, positive overall in relation to housing objectives, neutral in relation to others	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified.	Not carried forward - This would not support meeting the needs for the different tenures as identified in the HEDNA and would not accord with paragraph 64 of the NPPF. Scores lower than Option 2C on sustainability grounds
2C	Yes, positive overall in relation to housing objectives, neutral in relation to others. Strong positive for Objective 8 as it ensures the appropriate tenures are delivered	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified. Greater impacts as this is the most appropriate option to be included in the proposed policy	Policy Option to be carried forward together with Policy Option 1 and 3 to form one policy (HOU2) - This would support meeting the needs for the different tenures. It is important that the split is noted in the policy as a “starting point” for discussions with RDC, so that the actual split can be agreed on a site by site basis.
3A	Yes, positive overall in relation to housing objectives, neutral in relation to others	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified.	Not carried forward - This would not allow for changes on a site by site basis and would not take account of current need in different areas or the effect on scheme viability. Scores lower than Option 3C on sustainability grounds.
3B	Yes, positive overall in relation to housing objectives, neutral in relation to others	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified.	Not carried forward - This would give developers no indication of the different sizes and tenures required. Scores lower than Option 3C on sustainability grounds.
3C	Yes, positive overall in relation to housing objectives, neutral in relation to others. Strong positive for Objective 8 as it ensures the appropriate size and mix are delivered	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified.	Policy Option to be carried forward together with Policy Option 1 and 2 to form one policy (HOU2) - The HEDNA (2024) does make recommendations in terms of the sizes of dwellings likely to be needed of each affordable tenure so it is appropriate to include this information in the policy, but again, it is important that it is noted as a “starting point” for discussions to allow for flexibility on a site by site basis to reflect current local needs, scheme viability and other matters
4A	Yes, positive overall in relation to housing objectives, neutral in relation to others	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified.	Policy option to be carried forward in policy HOU3 - supported in order to guide allocations in Neighbourhood Plans.
4B	Yes, positive overall in relation to housing objectives, neutral in relation to others	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified.	Not carried forward - This would not support the need to deliver as much affordable housing as possible (as identified in the HEDNA 2024). Negative impact overall (not necessarily sustainability wise) if the policy is not brought forward
4C	Yes, positive overall in relation to housing objectives, neutral in relation to others. Strong positive score for Objective 8 compared to policies 4A and 4B.	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified. The most positive of policy options under this topic.	Policy option to be carried forward in policy HOU4 - It is considered that two policies will help clarify the intended approach, which is to give as much planning policy support as possible to affordable housing, recognising that it will not all be delivered as

Policy Options	Does this have a significant effect on the SA objective(s), whether positive or negative? (See also the baseline indicators and prompt question)	What is the likely Impact?	Is this a temporary or permanent Impact?	Is this a short term or long term impact?	Are there synergies between other policies (or options) which might amplify the effect?	Commentary/Notes (Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score)
						a proportion of general housing through a planning obligation and that there are other routes to its delivery, as identified in the HEDNA (2024)
5A	Yes, positive overall in relation to housing objectives, neutral in relation to others	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified.	Not carried forward - the current requirement of the policy that schemes are either initiated or supported by the Parish Council may serve to prevent schemes coming forward which may be initiated by others, e.g. a CLT. Therefore, to further support the delivery of affordable housing on rural exception sites a policy change is needed
5B	Yes, positive overall in relation to housing objectives, neutral in relation to others	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified.	Not carried forward - Paragraph 82 of the NPPF is clear that rural exception sites should be supported and so an option is to rely on this. However, it is felt that a local policy helps make the local requirements clear
5C	Yes, positive overall in relation to housing objectives, neutral in relation to others. Strong positive score for Objective 8 compared to policies 4A and 4B.	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified. The most positive of the policy options under this topic.	Policy option to be carried forward in policy HOU5 - Retaining an exception sites policy allows the Council to set out the circumstances in which such sites will be supported including the considerations for allowing a proportion of market housing, further to the NPPF. Removing the requirement for Parish Council support does not conflict with the NPPF and could support a greater number of exception sites coming forward, which would support affordable housing delivery. A new requirement instead for meaningful community engagement to be demonstrated throughout the development process will ensure the local community has been involved in the process even when a Parish Council is not involved
6A	Yes, positive overall in relation to housing objectives, neutral in relation to others	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified.	Not carried forward - it is not considered that a new specific policy for TA is required. However, one specific issue that has been raised by housing colleagues and in local evidence is a need for additional HMO accommodation and the view that the existing Article 4 Direction in central Bexhill reduces the supply.
6B	Yes, positive overall in relation to housing objectives, neutral in relation to others. Strong positive score for Objective 8 compared to policies 4A and 4B.	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified. The most positive of the policy options under this topic.	Policy option to be carried forward in policy HOU6 - given the significant affordable housing need identified in the HEDNA it is appropriate for a new policy to clarify the circumstances in which a new HMO will be supported, and set a policy framework for considering planning applications. This policy can also give in principle support for the sub-division of existing dwellings, given the needs both for affordable housing and for smaller dwellings, as identified in the HEDNA
7A	Yes, positive overall in relation to housing objectives, neutral in relation to others	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified.	Not carried forward - This would be contrary to the findings and recommendations of the HEDNA (2024) which, while acknowledging that these measures could make First Homes more affordable, they would also mean that the provision of First Homes would be a greater financial burden on developers and therefore the viability of schemes and in particular the delivery of other forms of affordable housing would be adversely affected
7B	Yes, directly related to other policies in housing chapter where impacts are amplified. The most positive of the policy options under this topic.	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified. The most positive of the policy options under this topic along with 7D	Policy option to be carried forward together with other options in policy HOU2 - This would be in line with the recommendations of the HEDNA (2024) which found no evidence to support changing them.
7C	Yes, positive overall in relation to housing objectives, neutral in relation to others	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified.	Not carried forward - These are supported nationally through the Planning Practice Guidance, however they are not permitted in National Landscapes. As First Homes are not as effective in meeting the affordable housing needs of those people in the greatest need, it is not considered that particular local policy support for FH exception sites is required. Furthermore, the areas of the district in which they would be permitted is limited

Policy Options	Does this have a significant effect on the SA objective(s), whether positive or negative? (See also the baseline indicators and prompt question)	What is the likely Impact?	Is this a temporary or permanent Impact?	Is this a short term or long term impact?	Are there synergies between other policies (or options) which might amplify the effect?	Commentary/Notes (Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score)
7D	Yes, directly related to other policies in housing chapter where impacts are amplified. The most positive of the policy options under this topic.	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified. The most positive of the policy options under this topic along with 7B, therefore no policy is required.	No policy is required - This is adequately addressed through national guidance and consequently a local policy is not needed.
8A	Yes, directly related to other policies in housing chapter where impacts are amplified. The most positive of the policy options under this topic.	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified. The most positive of the policy options under this topic along with 8C, but not carried forward as doesn't not align exactly with evidence base in the HEDNA.	Not carried forward - This would not reflect the recommendations of the HEDNA which suggests that smaller dwellings are required throughout the district
8B	Yes, positive overall in relation to housing objectives, neutral in relation to others	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified	Not carried forward - This would not support the delivery of smaller dwellings as recommended by the HEDNA
8C	Yes, directly related to other policies in housing chapter where impacts are amplified. The most positive of the policy options under this topic.	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified. The most positive of the policy options under this topic along with 8A.	Policy option to be carried forward together with other options in policy HOU1 - This would reflect the recommendations of the HEDNA. It is further considered that the requirement should apply to market dwellings, because the HEDNA identifies a need for these and also, currently, on smaller schemes in particular, the 30% requirement is often met through affordable dwellings with very few smaller market dwellings provided. The mix for affordable dwellings can be covered by another part of the policy.
9A	Yes, positive overall in relation to housing objectives, neutral in relation to others	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified. Same sustainability score as Option 9B	Not carried forward - To require this for market housing would be contrary to the finding of the HEDNA that the mix achieved on a site will be influenced by the local property market and viability. Not recommended. Indicative proportions are appropriate for affordable housing however, as detailed above, as these can be more reliably determined with reference to the Housing Register
9B	Yes, positive overall in relation to housing objectives, neutral in relation to others	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified. Same sustainability score as Option 9A.	Policy option to be carried forward together with other options in policy HOU1 - This would allow for a degree of flexibility to encourage housing delivery (including affordable housing) while still allowing proposals to be considered more generally against the mix recommended in the HEDNA
10A	Yes, directly related to other policies in housing chapter where impacts are amplified. The most positive of the policy options under this topic, as it provides opportunities for a greater supply of dwellings and smaller dwellings, so can help people at the beginning of the property ladder	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified. The most positive of the policy options under this topic, helps with addressing deprivation potentially, and seeks to maximise housing land supply through reducing any losses	Policy option to be carried forward together with other options in policy HOU1 - There is currently no local policy basis for resisting net losses of dwellings, even though such proposals potentially have two adverse effects: (1) losing dwellings numbers and adversely affecting the local housing supply; and (2) adversely affecting the supply of smaller dwellings in particular, for which there is a demonstrable need. A new policy would allow these factors to be considered and set a clear presumption that such proposals would not be supported other than in exceptional circumstances
10B	Yes, positive overall in relation to housing objectives, neutral in relation to others, but not the preferred approach to address housing numbers.	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified. However, not an overall positive option to address housing land supply.	Not carried forward - For the reasons detailed above such proposals run contrary to supporting local housing need, maximising provision and reducing losses to residential supply.
11A	Yes, high positive overall in relation to housing and deprivation objectives, neutral in relation to others. Negative on impact on road	+	Permanent	Long Term	Yes, directly related to other policies in housing and live well locally chapter where impacts are amplified. Same	Not carried forward - There are very few developments of this scale in Rother. Any allocations for sites of this scale would have their own specific allocation policy which would consider appropriate needs on a site-by-site basis. It is considered the current

Policy Options	Does this have a significant effect on the SA objective(s), whether positive or negative? (See also the baseline indicators and prompt question)	What is the likely Impact?	Is this a temporary or permanent Impact?	Is this a short term or long term impact?	Are there synergies between other policies (or options) which might amplify the effect?	Commentary/Notes (Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score)
	congestion due to strategic nature and scale of relevant developments				sustainability score as option 11B but not advisable to carry forward as these issues could be a carried forward in site allocations	policy approach is sufficient, given the low numbers of developments affected. Additional requirements for older people's housing may be appropriate, as considered further below
11B	Yes, high positive overall in relation to housing and deprivation objectives, neutral in relation to others. Negative on impact on road congestion due to strategic nature and scale of relevant developments	+	Permanent	Long Term	Yes, directly related to other policies in housing and live well locally chapter where impacts are amplified	Policy option to be carried forward together with other options in policy HOU1 - For the reasons detailed above in Policy Option 11A this is the preferred approach.
12A	Yes, positive overall in relation to housing objectives, neutral in relation to others. Whilst not providing housing choices for all, could free up housing stock for other in the wider community.	+	Permanent	Long Term	Yes, directly related to other policies in housing and live well locally chapter where impacts are amplified	Policy option to be carried forward in policy HOU9 – Whilst this has the same sustainability score as other options 12B and 12C, this specific policy is justified, given the population profile of the district and the current and future need for specialist housing for older people.
12B	Yes, positive overall in relation to housing objectives, neutral in relation to others. Whilst not providing housing choices for all, could free up housing stock for other in the wider community.	+	Permanent	Long Term	Yes, directly related to other policies in housing and live well locally chapter where impacts are amplified	Not carried forward - While this would support the delivery of older people's housing it has been identified that changes to the policy wording are needed to reflect current evidence and update references
12C	Yes, positive overall in relation to housing objectives, neutral in relation to others. Whilst not providing housing choices for all, could free up housing stock for other in the wider community.	+	Permanent	Long Term	Yes, directly related to other policies in housing and live well locally chapter where impacts are amplified	Not carried forward - This would not reflect the special characteristics of older people's housing, for example its different forms and delivery models and would not support the delivery of older peoples housing although a need has been identified
13A	Yes, positive overall in relation to housing objectives, neutral in relation to others	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified	Policy option to be carried forward in policy HOU9 – Whilst this has the same sustainability score as option 13B, this would be line with the recommendations of the HEDNA and would support the delivery of older people's housing
13B	Yes, positive overall in relation to housing objectives, neutral in relation to others	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified	Not carried forward - There is a need to support the delivery of older people's housing, and as older people are a significant proportion of Rother's population, to require housing to meet their needs is in line with the objective of achieving mixed and balanced communities. To not require a proportion on strategic scale developments would be a missed opportunity
14A	Yes, positive overall in relation to housing objectives, neutral in relation to others	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified	Policy option to be carried forward in policy HOU9 and HOU13 – Although this has the same sustainability score as Option 14B, this would be in line with the recommendations of the HEDNA and recognises the significant need for specialist housing, and the difficulties that schemes face in competing with general needs housing due to their different finance/development models. It is important that any new policy only allows such developments in sustainable locations, and that the normal policy provisions for protecting the landscape character etc also apply
14B	Yes, positive overall in relation to housing objectives, neutral in relation to others	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified	Not carried forward - This would not support the delivery of specialist older people's accommodation
15A	Yes, positive overall in relation to housing objectives, neutral in relation to others. Stronger positive on Objective 7, health and	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter and live well locally where impacts are amplified	Policy option to be carried forward in policy HOU10 - Residential care homes for older people do raise specific planning considerations due to the uncertainties regarding the need for additional care beds and the fact that some care homes are expected to close over the Plan period because they do not meet current standards.

Policy Options	Does this have a significant effect on the SA objective(s), whether positive or negative? (See also the baseline indicators and prompt question)	What is the likely Impact?	Is this a temporary or permanent Impact?	Is this a short term or long term impact?	Are there synergies between other policies (or options) which might amplify the effect?	Commentary/Notes (Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score)
	wellbeing because of significant benefits to the district's growing elderly population.					Therefore, a specific policy is justified. Long term positive in relation to health and wellbeing, especially in relation in growing elderly population in the district.
15B	Yes, positive overall in relation to housing objectives, neutral in relation to others	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified	Not carried forward - Relying on the existing policy approach means that developments involving the loss of care homes are only permitted if (i) there is an over-provision in the local area; or (ii) viability and marketing evidence shows there is no demand. This does not allow for a situation where the care home does not meet current standards and cannot viably be improved to meet them, and runs contrary to the findings of the HEDNA.
16A	Yes, positive overall in relation to housing objectives, neutral in relation to others	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified	Not carried forward - This would support the delivery of bungalows, which are a desirable form of accommodation for older people, including those on the Housing Register. However there is no specific evidence that would support a particular requirement and doing so may impact on scheme viability and the delivery of other dwelling types
16B	Yes, positive overall in relation to housing objectives, neutral in relation to others. Stronger positive on Objective 8 where the community would benefit from a range of housing types such as bungalows.	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter and live well locally where impacts are amplified	Policy option to be carried forward in policy HOU1 - This is a more flexible approach which would also allow the requirements of different household types (e.g. younger people) to be considered. This scores highly on objective 8 in relation housing provision as it provides greater choice in the market for those who would prefer or need to living in bungalow style accommodation.
17A	Yes, positive overall in relation to housing objectives, neutral in relation to others. Stronger positive on Objectives 7 and 8 where the need is evidenced in the HEDNA	+	Permanent	Long Term	Yes, directly related to other policies in housing and live well locally chapter where impacts are amplified	Policy option to be carried forward in policy HOU8 - Evidence, as set out in the HEDNA, supports retaining this existing policy requirement as it would address an identified need (as required by the NPPF)
17B	Yes, positive overall in relation to housing objectives, neutral in relation to others.	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified	Not carried forward - This would not be in line with the recommendations of the HEDNA
18A	Yes, positive overall in relation to housing objectives, neutral in relation to others. Stronger positive on Objectives 7 and 8 where the need is evidenced in the HEDNA	+	Permanent	Long Term	Yes, directly related to other policies in housing and live well locally chapter where impacts are amplified	Policy option (with 18B and C) to be carried forward in policy HOU8 - This would be in line with the recommendations of the HEDNA and would facilitate the delivery of this housing type, which evidence shows is needed
18B	Yes, positive overall in relation to housing objectives, neutral in relation to others. Stronger positive on Objectives 7 and 8 where the need is evidenced in the HEDNA	+	Permanent	Long Term	Yes, directly related to other policies in housing and live well locally chapter where impacts are amplified	Policy option (with 18A and C) to be carried forward in policy HOU8 - This would be in line with the recommendations of the HEDNA and would facilitate the delivery of this housing type, which evidence shows is needed
18C	Yes, positive overall in relation to housing objectives, neutral in relation to others. Stronger positive on Objectives 7 and 8 where the need is evidenced in the HEDNA	+	Permanent	Long Term	Yes, directly related to other policies in housing and live well locally chapter where impacts are amplified	Policy option (with 18A and B) to be carried forward in policy HOU8 - This would be in line with the recommendations of the HEDNA which finds a requirement of "up to 10%" is justified (where the local authority is responsible for allocating or nominating a person to live in that dwelling). However, it would exceed the proportions suggested by the Housing Register data, which suggests that while 16.5% of the total number on the Housing Register have a mobility problem, less than 5% of the total rely on a wheelchair indoors or outdoors. Therefore, the retention of the current policy requirement is justified
19A	Yes, positive overall in relation to housing objectives, neutral in relation to others.	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified	Not carried forward - There is a current Local Plan policy supporting rural exception sites for affordable housing and this policy will be carried forward. It would support an exception site of SCHB providing the development met the criteria of the policy. It is not considered there is a need for a separate policy for SCHB exception sites

Policy Options	Does this have a significant effect on the SA objective(s), whether positive or negative? (See also the baseline indicators and prompt question)	What is the likely Impact?	Is this a temporary or permanent Impact?	Is this a short term or long term impact?	Are there synergies between other policies (or options) which might amplify the effect?	Commentary/Notes (Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score)
19B	Yes, positive overall in relation to housing objectives, neutral in relation to others.	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified. This policy option will be considered at the next stage of the Local Plan – i.e. with site allocation stage	Not carried forward - This could be considered at a later stage of the Local Plan development although data from the Council's SCHB Register suggests that most people on it want an individual plot. Therefore there may not be significant demand for a plot on a shared site. There is nothing to stop any of the existing allocations as coming forward as SCHB developments
20A	Yes, positive overall in relation to housing objectives, neutral in relation to others.	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified	Clarified the position of 5% within policy HOU12 - The limited evidence to date shows that schemes seek to achieve 5% rather than 10% as the policy does not require the maximum figure. Therefore the number could be amended to “at least 5%”. It is too early to determine how successful the policy has been in terms of delivering plots, or whether there has been a demand for the plots that have been secured
20B	Yes, positive overall in relation to housing objectives, neutral in relation to others. Stronger positive on objective 8 in relation to housing to meet peoples needs.	+	Permanent	Long Term	Yes, directly related to other policies in housing and live well locally chapter where impacts are amplified	Carry forward existing approach and threshold - The threshold (20 dwellings) is already low compared to many Councils, which adopt a higher threshold of 50 or 100 dwellings. However, even at 20, the number of plots permissioned has been low, due to the relatively low number of qualifying residential schemes permissioned, particularly in the rural areas. It is too early to determine the success of the uptake of plots. To increase the threshold would further reduce the number of plots permissioned
21A	Yes, positive overall in relation to housing objectives, neutral in relation to others.	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified	Policy option to be carried forward in Policy HOU13 - This would serve to facilitate additional housing in rural areas but it would not guarantee that the additional housing would be of a scale or price which would make it affordable or suitable for the rural population. Additional controls could be considered (e.g. maximum size of dwellings, affordable housing only)
21B	Yes, positive overall in relation to housing objectives, neutral in relation to others.	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified. This approach will be undertaken at the next stage of the Local Plan.	Not carried forward at the moment (but will be considered at the next stage of the Local Plan) - This is a relatively large piece of work and is unlikely to be achievable in the time before the regulation 18 consultation. In any event even if this was undertaken it would be difficult to anticipate all possible areas that could be suitable for one or two dwellings, so there may still be a need for a new policy approach as outlined above in Option 21A.
22A	Yes, positive overall in relation to housing objectives, neutral in relation to others.	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified	Not carried forward – This policy approach is not required. There is no need to duplicate paragraph 84, and indeed, paragraph 16(f) of the NPPF.
23A	Yes, positive overall in relation to housing objectives, neutral in relation to others.	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified	Not carried forward - Prioritising residential use of farmsteads could increase the number of dwellings in unsustainable locations served poorly by public transport.
23B	Yes, positive overall in relation to housing objectives, neutral in relation to others.	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified	Policy option to be carried forward in Policy HOU13 - This policy approach appears to work well and is in line with the objectives of supporting the agricultural economy and also the wider rural economy, but allowing for residential use (and thus preserving the buildings) if an alternative use is not suitable or achievable
24A	Yes, positive overall in relation to housing objectives, neutral in relation to others. Stronger positive on objective 16 and 17 in relation to economic objectives.	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified	Policy option to be carried forward in Policy HOU13 - The existing policy approach (Policy RA3 (iii) (a) of the Core Strategy) already allows new dwellings to support farming and other land-based industries. Furthermore, many temporary dwellings for agricultural workers are permitted development and fall outside planning control.
24B	Yes, positive overall in relation to housing objectives, neutral in relation to others.	+	Permanent	Long Term	Yes, directly related to other policies in housing chapter where impacts are amplified	Policy option to be carried forward in Policy HOU13 and elements of HO2, HO5 - This would address the general concern of a lack of affordable housing for rural workers in the rural areas

Policy Options	Does this have a significant effect on the SA objective(s), whether positive or negative? (See also the baseline indicators and prompt question)	What is the likely Impact?	Is this a temporary or permanent Impact?	Is this a short term or long term impact?	Are there synergies between other policies (or options) which might amplify the effect?	Commentary/Notes (Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score)
	Stronger positive on objective 16 and 17 in relation to economic objectives.					
25A	Yes, positive overall in relation to housing objectives, neutral in relation to others. Stronger positive on objective 16 and 17 in relation to economic objectives.	+	Permanent	Long Term	Yes, directly related to other policies in housing and live well locally chapter where impacts are amplified	Policy not required – Although the sustainability of option is higher because of the economic benefits, the HEDNA finds no demand or need for specific live-work units as part of the overall housing need. Therefore, there is no justification for an exceptions site approach, to make site allocations, or a requirement to deliver live-work units as part as larger developments
26A	Yes, positive overall in relation to housing objectives, neutral in relation to others.	+	Permanent	Long Term	Yes, directly related to other policies in housing and live well locally chapter where impacts are amplified	Not carried forward - Given the historic difficulties in identifying new sites for gypsies and travellers in the district, it cannot be determined at this stage whether sufficient sites will be identified to meet needs. Furthermore, even if sites are allocated, historically, new sites tend to come forward as “windfall” development and not through allocations being developed. Therefore, to rely on site allocations alone risks not allowing the need for gypsy and traveller sites to be met
26B	Yes, positive overall in relation to housing objectives, neutral in relation to others. Stronger positive on objective 8 and 18 in relation to housing and reducing social exclusion objectives.	+	Permanent	Long Term	Yes, directly related to other policies in housing and live well locally chapter where impacts are amplified.	Policy option to be carried forward in Policy HOU11 - As there is no evidence of a likely change to the delivery of new sites (i.e. windfall development is likely to continue, regardless of allocations) there is a continued need for a criteria-based policy. This option scores higher in sustainability compared to option 26A.
27A	Yes, positive overall in relation to housing objectives, neutral in relation to others. Stronger positive on objective 8 and 18 in relation to housing and reducing social exclusion objectives.	+	Permanent	Long Term	Yes, directly related to other policies in housing and live well locally chapter where impacts are amplified.	Not carried forward - Currently, transit sites are covered by the general criteria-based policy and it is considered this approach can appropriately continue. This option scores higher in sustainability compared to option 27B.
27B	Yes, positive overall in relation to housing objectives, neutral in relation to others.	+	Permanent	Long Term	Yes, directly related to other policies in housing and live well locally chapter where impacts are amplified	Policy option to be carried forward in Policy HOU11 - For the reasons detailed above in Option 27A this approach is recommended.
28A	Yes, positive overall in relation to housing objectives, neutral in relation to others. Stronger positive on objective 8 and 18 in relation to housing and reducing social exclusion objectives.	+	Permanent	Long Term	Yes, directly related to other policies in housing and live well locally chapter where impacts are amplified	Policy option to be carried forward in Policy HOU6 - While HMOs are not resisted under current general planning policy, the existence of the Article 4 Direction in Bexhill does appear to be interpreted in this manner. A new policy would set a clear policy direction that they will be supported in appropriate circumstances and help meet the need for this type of accommodation as identified in the HEDNA and the Council's own strategy documents. A policy could also be made wider to also cover the subdivision of large dwellings into smaller dwellings, as evidence in the HEDNA also found a need for smaller dwellings.
28B	Yes, positive overall in relation to housing objectives, neutral in relation to others.	+	Permanent	Long Term	Yes, directly related to other policies in housing and live well locally chapter where impacts are amplified	Not carried forward - While this would potentially assist in increasing understanding of the Article 4 Direction in central Bexhill only, it would not provide any planning policy to guide planning applications for a HMO or provide any planning policy support for the sub-division of dwellings. It would not be in line with the recommendations of the HEDNA and would not as effectively support the delivery of this much needed accommodation type.
29A	Yes, positive overall in relation to housing objectives, neutral in relation to others. Strong positive in relation to Objective 8 Housing compared to other areas.	+	Permanent	Long Term	Yes, directly related to other policies in housing and live well locally chapter where impacts are amplified	Policy option to be carried forward in Policy HOU1 - The HEDNA did not identify significant demand for BTR in the district and it must be noted that to date, BTR schemes have been focused in larger towns and cities. However, evidence does show that the need for private rented accommodation is likely to grow, especially among younger people, and BTR developments could ease pressure on this sector and provide for good quality rented accommodation. A supportive policy, potentially in the form of a criteria within a wider housing policy, would give a clear policy indication that

Policy Options	Does this have a significant effect on the SA objective(s), whether positive or negative? (See also the baseline indicators and prompt question)	What is the likely Impact?	Is this a temporary or permanent Impact?	Is this a short term or long term impact?	Are there synergies between other policies (or options) which might amplify the effect?	Commentary/Notes (Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score)
						BTR schemes will be supported in appropriate locations which would help delivery of these developments, in line with the recommendations of the HEDNA
29B	Yes, positive overall in relation to housing objectives, neutral in relation to others. Strong positive in relation to Objective 8 Housing compared to other areas.	+	Permanent	Long Term	Yes, directly related to other policies in housing and live well locally chapter where impacts are amplified	Not carried forward – Although the option scores the same in sustainability as option 29B, significant demand for BTR has not been identified. Furthermore the HEDNA notes that viability would need to be assessed. Consequently there is no evidence that would support an approach to require BTR as part of larger developments and no evidence that if an allocation were made it would be brought forward.
30A	Yes, positive overall in relation to housing objectives, neutral in relation to others. Strong positive in relation to Objective 8 Housing compared to other areas	+	Permanent	Long Term	Yes, directly related to other policies in housing and live well locally chapter where impacts are amplified	Not carried forward - the HEDNA (2024) does not identify a particular need for specific policy support for housing for families or young people. It does however make recommendations for supportive policies for a range of issues that will serve to meet the needs of housing for families and young people, including: the need to plan for a mix of dwelling sizes including a proportion of larger dwellings, increasing the numbers of 2-3 bedroom dwellings in the intermediate affordable sector; supporting affordable housing generally, supporting affordable options including HMOs, supporting build-to-rent. These recommendations have been taken forward as proposed policy options as detailed in the sections above. Therefore, it is not considered necessary for a specific policy on housing for families as this would only serve to duplicate other policies.
30B	Yes, positive overall in relation to housing objectives, neutral in relation to others, in relation to Objective 8 Housing compared to other areas.	+	Permanent	Long Term	Yes, directly related to other policies in housing and live well locally chapter where impacts are amplified	Policy option to be carried forward in Policy HOU1 – Whilst this scored the same in sustainability terms as Option 30A, for the reasons detailed above this option is preferred.
31A	Yes, positive overall in relation to housing objectives, neutral in relation to others. Specific negatives identified in relation to economic performance because of limiting opportunities of tourist accommodation	+	Permanent	Long Term	Yes, directly related to other policies in housing, economy and live well locally chapter where impacts are amplified	Not carried forward - There is insufficient evidence that such a broad-ranging policy is needed across the district. It would be likely to impact on viability and could adversely impact the delivery of new housing. It would have limited impact in influencing the issue of second homes generally as it would only relate to new dwellings and would not affect the use of existing dwellings as second homes
31B	Yes, positive overall in relation to housing objectives, neutral in relation to others. Specific negatives identified in relation to economic performance because of limiting opportunities of tourist accommodation	+	Permanent	Long Term	Yes, directly related to other policies in housing, economy and live well locally chapter where impacts are amplified	Not carried forward - While there is evidence that there are higher concentrations of second homes in certain areas of the district, these are likely to be limited to relatively small geographical areas (and there is insufficient evidence currently to determine the precise areas). As above, the policy would have limited impact in influencing the issue of second homes generally as it would only relate to new dwellings and would not affect the use of existing dwellings as second homes. Not recommended at the current time, although this could be further explored by Neighbourhood Plan groups
31C	Yes, positive overall in relation to housing objectives, neutral in relation to others. Specific negatives identified in relation to economic performance because of limiting opportunities of tourist accommodation	+	Permanent	Long Term	Yes, directly related to other policies in housing, economy and live well locally chapter where impacts are amplified.	Policy option to be carried forward in Policy HOU13 - While the impact of a policy would be limited due to it only applying to new dwellings (as detailed above), it is considered that a policy can be justified for new homes in the countryside (i.e. outside the development boundary) because these are only allowed in limited circumstances to meet particular rural housing needs, having regard to the identified affordable housing needs in the rural areas. If a dwelling were permitted under this policy and subsequently used as a second home, this would be contrary to that objective. Although this scores the same in sustainability terms as other options 31A and 31B, this is the preferred option to carry forward.
32A	Yes, positive overall in relation to housing objectives, neutral in relation to others. Strong positive in relation to housing standards.	+	Permanent	Long Term	Yes, directly related to other policies in housing and live well locally chapter where impacts are amplified.	Not carried forward - The evidence supports the retention of the policy requirement. However, the HEDNA (2024) identified an additional potential issue with

Policy Options	Does this have a significant effect on the SA objective(s), whether positive or negative? (See also the baseline indicators and prompt question)	What is the likely Impact?	Is this a temporary or permanent Impact?	Is this a short term or long term impact?	Are there synergies between other policies (or options) which might amplify the effect?	Commentary/Notes (Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score)
						regard to the internal size of rooms intended for use as a study. Retaining the policy in an unaltered form would not address this.
32B	Yes, positive overall in relation to housing objectives, neutral in relation to others. Neutral in relation to housing standards, and suitable homes as could create issues with smaller studies that could then become bedrooms of a smaller size.	+	Permanent	Long Term	Yes, directly related to other policies in housing and live well locally chapter where impacts are amplified	Not carried forward - This would be likely to result in dwellings with smaller room sizes and a poorer level of amenity for occupiers. There is no current viability evidence to suggest the requirement should be removed.
32C	Yes, positive overall in relation to housing objectives, neutral in relation to others. Strong positive in relation to housing standards.	+	Permanent	Long Term	Yes, directly related to other policies in housing and live well locally chapter where impacts are amplified	Policy option to be carried forward in Policy HOU7 – Whilst this has the same sustainability score as option 32A, the evidence supports this option as it will ensure that rooms intended as dedicated workspace could be occupied by additional residents without adversely affecting housing standards or amenity. However, this option will need to be subject to viability testing
33A	Yes, positive overall in relation to housing and health and well-being objectives, neutral in relation to others.	+	Permanent	Long Term	Yes, directly related to other policies in housing and live well locally chapter where impacts are amplified	Not carried forward – Whilst it has the same sustainability score as Option 33B and 33C, it is considered that the current policy, together with the supporting text of the DaSA, does provide for this flexibility. Nevertheless, incorporating some of the supporting text into the policy wording itself would help to clarify this. Furthermore, the current policy requirement relating to flats is vague, and does not accord with the Building for a Healthy Life criteria
33B	Yes, positive overall in relation to housing and health and well-being objectives, neutral in relation to others.	+	Permanent	Long Term	Yes, directly related to other policies in housing and live well locally chapter where impacts are amplified	Not carried forward - Whilst it has the same sustainability score as Option 33A and 33C, at this stage in the Local Plan process, local design codes have not yet been developed. Therefore this approach is not recommended at this stage.
33C	Yes, positive overall in relation to housing and health and well-being objectives, neutral in relation to others.	+	Permanent	Long Term	Yes, directly related to other policies in housing and live well locally chapter where impacts are amplified	Policy option to be carried forward in Policy HOU14 - Whilst it has the same sustainability score as Option 33B and 33C, this approach would retain the policy requirements and ensure that an appropriate level of external amenity space is provided for both houses and flats, in accordance with Building for a Healthy Life. It would provide further clarity for developers and guidance on how the policy can be applied flexibly.
34A	Yes, positive overall in relation to housing and health and well-being objectives, neutral in relation to others.	+	Permanent	Long Term	Yes, directly related to other policies in housing and live well locally chapter where impacts are amplified	Not carried forward - The existing policy requirements remain relevant but it is felt that the requirements for cycle storage in particular could be further detailed to comply with Building for a Healthy Life
34B	Yes, positive overall in relation to housing and health and well-being objectives, neutral in relation to others.	+	Permanent	Long Term	Yes, directly related to other policies in housing and live well locally chapter where impacts are amplified	Not carried forward - the removal of the policy requirement would result in the reference to the County Council's guidance being lost, potentially weakening the effectiveness of this adopted guidance
34C	Yes, positive overall in relation to housing and health and well-being objectives along with climate change, neutral in relation to others.	+	Permanent	Long Term	Yes, directly related to other policies in housing and live well locally chapter where impacts are amplified. Significant benefits on addressing climate change with links to electric vehicle charging facilities etc.	Policy option to be carried forward in Policy HOU14 – This has the greatest sustainability score of the options as it provides the best outcome for design, residential amenity and sustainable travel choices is considered to be achieved by retaining the local policy requirement but updating it to reflect the recommendations of Building for a Healthy Life and also including reference to EV charging points which are now a requirement of all new dwellings.
35A	Overall negative impact with risk to the natural environment. Neutral impacts on all other objectives.	-	Permanent	Long Term	No major synergies with other policy options, but generally related to other development management policies in the plan	Not carried forward - Deleting this policy would introduce uncertainty in determining planning applications for these developments and could result in extensions to residential gardens which would create harmful long term impacts to rural character

Policy Options	Does this have a significant effect on the SA objective(s), whether positive or negative? (See also the baseline indicators and prompt question)	What is the likely Impact?	Is this a temporary or permanent Impact?	Is this a short term or long term impact?	Are there synergies between other policies (or options) which might amplify the effect?	Commentary/Notes (Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score)
35B	Overall small positive impact with neutral impacts on all other objectives	+	Permanent	Long Term	No major synergies with other policy options, but generally related to other development management policies in the plan	Policy option to be carried forward in Policy HOU15 - There is no evidence that the policy is ineffective or that it adversely affects viability or the delivery of schemes. It accords with national and local policy in terms of protecting the landscape
36A	Overall negative impact with risk to the natural environment and built heritage. Neutral impacts on all other objectives.	-	Permanent	Long Term	No major synergies with other policy options, but generally related to other development management policies in the plan	Not carried forward - Deleting this policy would introduce uncertainty in determining planning applications for these developments and could result in proposals that do not accord with the policy objectives, which could ultimately reduce the standard of design and residential amenity and cause harm to local character including historic buildings and areas
36B	Overall small positive impact with neutral impacts on all other objectives	+	Permanent	Long Term	No major synergies with other policy options, but generally related to other development management policies in the plan	Policy option to be carried forward in Policy HOU16 - There is no evidence that the policy is ineffective or that it adversely affects viability or the delivery of schemes. It accords with national policy
37A	Overall negative impact with risk to the natural environment and built heritage. Neutral impacts on all other objectives.	-	Permanent	Long Term	No major synergies with other policy options, but generally related to other development management policies in the plan	Not carried forward - Deleting this policy would introduce uncertainty in determining planning applications for these developments and could result in proposals that do not accord with the policy objectives, which could ultimately reduce the standard of design and residential amenity and cause harm to local character
37B	Overall small positive impact with neutral impacts on all other objectives	+	Permanent	Long Term	No major synergies with other policy options, but generally related to other development management policies in the plan	Policy option to be carried forward in Policy HOU17 - There is no evidence that the policy is ineffective or that it adversely affects viability or the delivery of schemes.
38A	Overall negative impact with risk to the local character and design. Neutral impacts on all other objectives.	-	Permanent	Long Term	No major synergies with other policy options, but generally related to other development management policies in the plan	Not carried forward - Deleting this policy would introduce uncertainty in determining planning applications for these developments and could result in proposals that do not accord with the policy objectives, which could ultimately reduce the standard of design and cause harm to local character
38B	Overall small positive impact with neutral impacts on all other objectives	+	Permanent	Long Term	No major synergies with other policy options, but generally related to other development management policies in the plan	Policy option to be carried forward in Policy HOU18 – There is no evidence that the policy is ineffective or that it adversely affects viability or the delivery of schemes
39A	Overall negative impact with risk to the local character and drainage. Neutral impacts on all other objectives.	-	Permanent	Long Term	No major synergies with other policy options, but generally related to other development management policies in the plan	Not carried forward - Deleting this policy would introduce uncertainty in determining planning applications for these developments and could result in proposals that do not accord with the policy objectives, which could ultimately reduce the standard of design and cause harm to local character and drainage
39B	Overall small positive impact with neutral impacts on all other objectives	+	Permanent	Long Term	No major synergies with other policy options, but generally related to other development management policies in the plan	Policy option to be carried forward in Policy HOU19 - There is no evidence that the policy is ineffective or that it adversely affects viability or the delivery of schemes

SA Objective / Draft Policies	1a	1b	1c	2a	2b	3a	3b	4a	4b	5a	5b
1. Reduce air pollution from transport and development and improve air quality.	o	o	o	N/A	N/A	o	o	o	o	o	o
2. Biodiversity is protected, conserved and enhanced.	o	o	o	N/A	N/A	o	o	o	o	o	o
3. The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation)	-	-	o	N/A	N/A	-	-	o	o	o	o
4. Minimise water consumption.	-	-	o	N/A	N/A	-	-	o	o	-	o
5. Manage and reduce the risk of flooding (fluvial, tidal and surface water), now and in the future, and increase resilience to the wider effects of climate change.	o	o	o	N/A	N/A	o	o	o	o	o	o
6. The risk of coastal erosion is managed and reduced, now and in the future.	o	o	o	N/A	N/A	o	o	o	o	o	o
7. The health and well-being of the population is improved and inequalities in health are reduced.	o	o	o	N/A	N/A	o	o	++	+	+	o
8. More opportunities are provided for everyone to in a suitable home to meet their needs.	o	o	o	N/A	N/A	o	o	+	+	o	o
9. All sectors of the community have improved accessibility to services, facilities, jobs, and social and cultural opportunities.	+	+	o	N/A	N/A	+	+	++	+	+	o
10. Safe and secure environments are created and there is a reduction in crime and fear of crime.	o	o	o	N/A	N/A	o	o	+	+	+	o
11. Historic environment/ townscape is protected, enhanced and made more accessible.	o	o	o	N/A	N/A	o	o	o	o	o	o
12. The risk of pollution to land and soils is reduced and quality is improved.	-	-	o	N/A	N/A	-	-	o	o	o	o
13. Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced.	o	o	o	N/A	N/A	o	o	o	o	o	o
14. The risk of pollution to water is reduced and water quality is improved.	-	-	o	N/A	N/A	-	-	o	o	o	o
15. Ensure that Parks, gardens and countryside are protected, enhanced and made more accessible.	-	-	o	N/A	N/A	-	-	o	o	o	o
16. Economic performance is improved.	++	++	o	N/A	N/A	++	++	++	+	+	o
17. There are high and stable levels of employment and diverse employment opportunities for all.	++	++	o	N/A	N/A	++	+	++	+	+	o
18. Levels of poverty and social exclusion are reduced, and the deprivation gap is closed in the more deprived areas.	+	+	o	N/A	N/A	+	+	++	+	+	o
19. Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve.	+	+	o	N/A	N/A	+	+	+	+	o	o
20. Road congestion levels are reduced and there is less car dependency and greater travel choice.	o	o	o	N/A	N/A	o	o	o	o	+	o
SCORING	2	2	0	N/A	N/A	2	1	13	8	6	0

SA Objective / Draft Policies	6a	6b	6c	7a	7b	8a	8b	8c	8d	9a	9b
1. Reduce air pollution from transport and development and improve air quality.	+	+	o	+	o	-	o	o	o	-	-
2. Biodiversity is protected, conserved and enhanced.	o	o	o	o	o	o	o	o	o	o	-
3. The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation)	+	+	o	+	o	-	o	o	o	-	-
4. Minimise water consumption.	o	o	o	o	o	o	o	o	o	o	o
5. Manage and reduce the risk of flooding (fluvial, tidal and surface water), now and in the future, and increase resilience to the wider effects of climate change.	o	o	o	o	o	o	o	o	o	o	o
6. The risk of coastal erosion is managed and reduced, now and in the future.	o	o	o	o	o	o	o	o	o	o	o
7. The health and well-being of the population is improved and inequalities in health are reduced.	+	+	o	+	o	+	+	-	o	+	+
8. More opportunities are provided for everyone to in a suitable home to meet their needs.	o	o	o	o	o	o	--	+	-	o	o
9. All sectors of the community have improved accessibility to services, facilities, jobs, and social and cultural opportunities.	+	+	o	+	o	+	+	-	o	+	+
10. Safe and secure environments are created and there is a reduction in crime and fear of crime.	+	+	o	+	o	o	o	o	o	o	o
11. Historic environment/ townscape is protected, enhanced and made more accessible.	o	o	o	o	o	o	o	o	o	+	+
12. The risk of pollution to land and soils is reduced and quality is improved.	o	o	o	o	o	o	o	o	o	o	-
13. Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced.	o	o	o	o	o	o	o	o	o	-	-
14. The risk of pollution to water is reduced and water quality is improved.	o	o	o	o	o	-	o	o	o	-	-
15. Ensure that Parks, gardens and countryside are protected, enhanced and made more accessible.	o	o	o	o	o	o	o	o	o	o	-
16. Economic performance is improved.	+	+	o	++	o	++	++	-	+	++	+
17. There are high and stable levels of employment and diverse employment opportunities for all.	+	+	o	+	o	+	++	-	+	+	+
18. Levels of poverty and social exclusion are reduced, and the deprivation gap is closed in the more deprived areas.	+	+	o	+	o	+	++	-	+	+	+
19. Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve.	o	o	o	o	o	o	+	-	+	o	o
20. Road congestion levels are reduced and there is less car dependency and greater travel choice.	+	+	o	+	o	-	o	o	o	-	-
SCORING	9	9	0	10	0	3	8	-5	3	2	-2

SA Objective / Draft Policies	10a	10b	10c	10d	10e	10f	11a	11b	12a	12b	13a	13b
1. Reduce air pollution from transport and development and improve air quality.	o	o	o	o	o	o	o	o	o	o	o	o
2. Biodiversity is protected, conserved and enhanced.	o	o	o	o	o	o	-	o	-	o	+	o
3. The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation)	o	o	o	o	o	o	o	o	-	o	o	o
4. Minimise water consumption.	o	o	o	o	o	o	o	o	o	o	o	o
5. Manage and reduce the risk of flooding (fluvial, tidal and surface water), now and in the future, and increase resilience to the wider effects of climate change.	o	o	o	o	o	o	o	o	o	o	o	o
6. The risk of coastal erosion is managed and reduced, now and in the future.	o	o	o	o	o	o	o	o	o	o	o	o
7. The health and well- being of the population is improved and inequalities in health are reduced.	+	o	o	o	o	o	o	o	o	o	o	o
8. More opportunities are provided for everyone to in a suitable home to meet their needs.	+	o	o	-	o	o	o	o	o	o	o	o
9. All sectors of the community have improved accessibility to services, facilities, jobs, and social and cultural opportunities.	+	o	+	+	+	+	o	o	o	o	o	o
10. Safe and secure environments are created and there is a reduction in crime and fear of crime.	o	o	o	o	o	o	o	o	o	o	o	o
11. Historic environment/ townscape is protected, enhanced and made more accessible.	o	o	o	o	o	o	o	o	o	o	o	o
12. The risk of pollution to land and soils is reduced and quality is improved.	o	o	o	o	o	o	o	o	o	o	o	o
13. Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced.	o	o	o	o	o	o	o	o	o	o	o	o
14. The risk of pollution to water is reduced and water quality is improved.	o	o	o	o	o	o	o	o	o	o	+	o
15. Ensure that Parks, gardens and countryside are protected, enhanced and made more accessible.	o	o	o	o	o	o	+	o	+	o	+	o
16. Economic performance is improved.	+	o	+	+	+	+	+	o	++	o	o	o
17. There are high and stable levels of employment and diverse employment opportunities for all.	+	o	++	++	+	++	o	o	+	o	o	o
18. Levels of poverty and social exclusion are reduced, and the deprivation gap is closed in the more deprived areas.	+	o	+	+	+	+	o	o	o	o	o	o
19. Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve.	+	o	++	++	+	++	o	o	o	o	o	o
20. Road congestion levels are reduced and there is less car dependency and greater travel choice.	o	o	o	o	o	o	o	o	-	o	+	o
SCORING	7	0	7	6	5	7	1	0	1	0	4	0

SA Objective / Draft Policies	DEV 4	No DEV 4
1. Reduce air pollution from transport and development and improve air quality.	-	-
2. Biodiversity is protected, conserved and enhanced.	o	o
3. The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation)	o	o
4. Minimise water consumption.	o	o
5. Manage and reduce the risk of flooding (fluvial, tidal and surface water), now and in the future, and increase resilience to the wider effects of climate change.	o	o
6. The risk of coastal erosion is managed and reduced, now and in the future.	o	o
7. The health and well-being of the population is improved and inequalities in health are reduced.	+	o
8. More opportunities are provided for everyone to in a suitable home to meet their needs.	o	o
9. All sectors of the community have improved accessibility to services, facilities, jobs, and social and cultural opportunities.	++	-
10. Safe and secure environments are created and there is a reduction in crime and fear of crime.	+	o
11. Historic environment/ townscape is protected, enhanced and made more accessible.	+	o
12. The risk of pollution to land and soils is reduced and quality is improved.	o	o
13. Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced.	o	o
14. The risk of pollution to water is reduced and water quality is improved.	o	o
15. Ensure that Parks, gardens and countryside are protected, enhanced and made more accessible.	o	o
16. Economic performance is improved.	++	-
17. There are high and stable levels of employment and diverse employment opportunities for all.	++	-
18. Levels of poverty and social exclusion are reduced, and the deprivation gap is closed in the more deprived areas.	+	o
19. Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve.	++	-
20. Road congestion levels are reduced and there is less car dependency and greater travel choice.	o	o
SCORING	11	-5

Policy Options	Does this have a significant effect on the SA objective(s), whether positive or negative? (See also the baseline indicators and prompt question)	What is the likely Impact?	Is this a temporary or permanent Impact?	Is this a short term or long term impact?	Are there synergies between other policies (or options) which might amplify the effect?	Commentary/Notes (Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score)
1a	Yes, directly impacts the ability to ensure economic growth	+	Permanent	Long Term	Yes, directly impacts the development strategy section of the Plan. Other employment policies amplify its impact.	Policy option to be carried forward in the Proposed Development Strategy - Setting out an employment need figure for the whole district would not set a limit on the amount of employment development for the different areas in the district, therefore providing flexibility where market demands are higher than anticipated in each area. Given the complexity of projecting needs, and the interconnected nature of the different areas within the FEMA, a flexible approach is preferred. The HEDNA provides the evidence base of overall need in the district, linked to needs of the wider Housing Market Area. Whilst the overall SA shows a relatively small positive impact, there are long term strong positive impacts and synergies between health and wellbeing and live well locally to ensure that residents have access to the right jobs in the right places. The delivery of employment need is therefore critical to ensure success of other policies in The Local Plan and should therefore be brought forward.
1b	Yes, directly impacts the ability to ensure economic growth	+	Permanent	Long Term	Yes. Links directly to the development strategy, which amplify the effect	Not carried forward - There is no evidence within the HEDNA for setting separate targets for sub-areas. This may unnecessarily constrain the development potential each sub-area. Not recommended.
1c	Neutral impacts overall, would not be planning positively	o	No impact	N/A	Yes. Links directly to the development strategy, which amplify the effect	Not carried forward - The NPPF requires strategic planning policies to plan positively to meet the District's objectively assessed needs for employment development. Not setting the targets objectively identified in the HEDNA would be to fail this requirement of national policy.
2a	N/A		N/A	N/A	N/A	It will be necessary for the HELAA to be at a later stage of development before site options can be considered.
2b	N/A		N/A	N/A	N/A	It will be necessary for the HELAA to be at a later stage of development before site options can be considered. This will include analysis of current site commitments to determine if there is scope to amend current allocations where possible. While not yet determined at this stage, this option is preferred as there is an identified surplus of office and industrial/light industrial uses, and a deficit of storage and distribution. In addition, it would provide flexibility in light of the potential for economic uncertainty in the current climate. Recommended subject to further research.
3a	Yes, positive effects overall on economic indicators	+	Permanent	Long Term	Yes, links to development principles and other employment policies which amplify the effect	Policy option to be carried forward in Policy ECO1: This policy, in combination with the provisions of Policy DEC3, would enable suitable development to come forward, while safeguarding amenity as well as areas outside of Development Boundaries as required.
3b	Neutral impacts overall on all indicators	o	Permanent	Long Term	Yes, this option would need to rely on other policy areas in the plan along with the NPPF	Not carried forward - Without a specific policy (3a above), it would not be clear that some forms of economic development are supported outside of Development Boundaries; and nor would it be certain that the forms of economic development permitted outside of Development Boundaries would be restricted in the nature – that is, normally limited to the principle of intensification, conversion, redevelopment and/or extension of existing sites and premises. It is considered that the above policy option achieves both clarity for prospective new development, as well as helping to safeguard the rural character of areas outside of Development Boundaries by establishing that forms of economic development are to be limited in scale
4a	Yes, strong positive effects overall on economic and health and wellbeing indicators	++	Permanent	Long Term	Yes, other economy policies, development principles health and wellbeing and live well locally.	Policy option to be carried forward in Policy ECO2 and DEV4: It is necessary to protect existing employment uses from commercial pressures for higher value uses, notably housing. The current policy works well and is often cited in the determination of planning applications. A longer marketing campaign is considered reasonable and justified.
4b	Yes, positive impact on economy and health and wellbeing indicators, neutral on others	+	Permanent	Long Term	Yes, other economy policies, development principles health and wellbeing and live well locally.	Not carried forward - The current policy is frequently applied in the determination of planning applications, and it is considered therefore that there is no reason to water down the tests for demonstrating that there is no reasonable prospect of its continued use. To do so would weaken the policy's capacity to protect existing employment sites and premises.

Policy Options	Does this have a significant effect on the SA objective(s), whether positive or negative? (See also the baseline indicators and prompt question)	What is the likely Impact?	Is this a temporary or permanent Impact?	Is this a short term or long term impact?	Are there synergies between other policies (or options) which might amplify the effect?	Commentary/Notes (Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score)
5a	Yes, positive impacts on economy, services and facilities, neutral on other indicators	+	Permanent	Long Term	Yes, services and facilities and economy policies, as well as live well locally.	Policy option to be carried forward in Policy ECO1: No retail and leisure need floorspace figures have been identified that can be translated into Plan target figures. However, that demand is difficult to forecast in these sectors, combined with identified interest from certain retailers and leisure providers, would suggest a need for a policy approach that is nonetheless broadly supportive of new development for town centre uses in relation to town centre and primary shopping area designations.
5b	No, neutral on all indicators. No significant impacts.	○	No impact	N/A	Yes, services and facilities and economy policies, as well as live well locally.	Not carried forward - For the reasons given above in option 5a, the lack of this wording may impact on the capacity and flexibility of town centre policy to enable retail and leisure development coming forward where market requirements are outside of forecasted requirements..
6a	Yes, positive impacts on promoting sustainable transport, services and facilities and other economic indicators	+	Permanent	Long Term	Yes, links to development strategy, live well locally and other employment policies which amplify the effect	Policy option to be carried forward together with Option 6B in Policy ECO3: These proposed designations, both in terms of hierarchy and extent of area, are the recommendations of the Retail and Town Centre Uses Study, and consequently there are no additional policy options. The designation functions alongside the sequential approach set out in the NPPF, to be applied in respect to town centre uses. Main town centre uses, excluding retail, should be located in town centres, then 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. This same sequential approach is to be applied to retail in respect of Primary Shopping Areas. Local Centres within the villages were not recommended by the Study.
6b	Yes, positive impacts on promoting sustainable transport, services and facilities and other economic indicators	+	Permanent	Long Term	Yes, links to development strategy, live well locally and other employment policies which amplify the effect	Policy option to be carried forward together with Option 6A in Policy ECO3: These proposed designations, both in terms of areas chosen and their extent, are the recommendations of the Retail and Town Centre Uses Study, and consequently there are no additional policy options. The designation functions alongside the sequential approach set out in the NPPF, to be applied in respect to town centre uses. Main town centre uses, excluding retail, should be located in town centres, then 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. This same sequential approach is to be applied to retail in respect of Primary Shopping Areas.
6c	No, neutral on all indicators. No significant impacts.	○	No impact	N/A	Yes, other employment policies in the plan.	Not carried forward - The NPPF requires the use of Article 4 Directions to be applied to the smallest area possible, including individual buildings; while its use should be restricted to situations where there is evidence of the loss of the essential core of a Primary Shopping Area. According to the Retail and Town Centre Uses Study, there is no evidence to suggest that this is the situation in Rother's PSAs, while no specific sites can be identified.
7a	Yes, strong positive impacts on promoting sustainable transport, services and facilities and other economic indicators	++	Permanent	Long Term	Yes, other employment policies in the plan.	Policy option to be carried forward in Policy ECO4: The proposed is the recommendation of the Retail and Town Centre Uses Study, while the application of Retail or Leisure Impact Assessments in respect of Town Centres and Primary Shopping Areas are required by the NPPF. The smaller threshold of 280sqm reflects the smaller average size of units within Rother's designated Town Centre and Primary Shopping Areas, and it is therefore necessary to assess new retail and leisure development for its impact on the viability and vitality town centres and primary shopping areas.
7b	No, neutral on all indicators. No significant impacts.	○	No impact	N/A	Yes, other employment policies in the plan.	Not carried forward - As above, a threshold of 2,500sqm would not screen new retail and leisure development that could otherwise impact on the viability and vitality of town centres and primary shopping areas.
8a	Yes, positive impacts on economy, services and facilities, neutral on other indicators	+	Permanent	Long Term	Yes, other employment, live well locally and green to the core policies in the plan	Policy option to be carried forward together with 8b and 8d in Policy ECO5: There are no identified changes in circumstances that would necessitate a change in policy approach. A different policy approach would need to be underpinned by a newer evidence base. It is also considered that other proposed policies in the plan, specifically the Live Well Locally and the Green to the Core Chapters, will introduce additional sustainability requirements for new development.
8b	Yes, positive impacts on economy, services and facilities, neutral on other indicators	+	Permanent	Long Term	Yes, other employment, live well locally and green to the core policies in the plan	Policy option to be carried forward together with 8a and 8d in Policy ECO5: It is necessary to protect against the loss of tourism uses, particularly the loss of visitor accommodation to residential. The current policy provision has been used effectively to protect such losses as part of the determination of planning proposals. The proposed delivery of this provision will also simplify things from their current format, which is spread across two policies. The proposed option would provide an equivalent to the current DEC3 but for tourism uses. No alternative policy approach is considered.

Policy Options	Does this have a significant effect on the SA objective(s), whether positive or negative? (See also the baseline indicators and prompt question)	What is the likely Impact?	Is this a temporary or permanent Impact?	Is this a short term or long term impact?	Are there synergies between other policies (or options) which might amplify the effect?	Commentary/Notes (Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score)
8c	Negative impact on economic indicators, health and wellbeing and deprivation	-	Permanent	Long Term	Yes, other employment, live well locally and green to the core policies in the plan	Not carried forward - Tourism facilities, particularly visitor accommodation, are frequently at risk from conversion to alternative uses, notably residential. A failure to safeguard such facilities would impact on Rother's tourism offer, its visitor economy and overall economic wellbeing. This has negative wide ranging impacts from a sustainability perspective and should not be carried forward.
8d	Yes, positive impacts on economy, services and facilities, neutral on other indicators	+	Permanent	Long Term	Yes, other employment, live well locally and green to the core policies in the plan	Policy option to be carried forward together with Options 8a and 8b in Policy ECO4: This policy provision is necessary, and there are no reasonable alternatives to consider.
9a	Yes, positive impacts on economy, services and facilities, neutral on other indicators	+	Permanent	Long Term	Yes, other employment, live well locally and green to the core policies in the plan	Policy option to be carried forward in Policy ECO6: There are no identified changes in circumstances that would necessitate a change in policy approach. A different policy approach would need to be underpinned by a newer evidence base. It is also considered that other proposed policies in the plan, specifically the Live Well Locally and the Green to the Core Chapters, will introduce additional sustainability requirements for new development.
9b	Yes, slightly negative score on impact on landscape and sustainable travel	-	Permanent	Long Term	Yes, other employment, live well locally and green to the core policies in the plan	Not carried forward - Holiday sites represent the majority of Rother's visitor accommodation offer, and therefore it is important that new holiday sites development is sufficiently dealt with through Local Plan policy. The criteria contained in the above policy option consider specific issues relating to holiday sites development. that safeguard the environment, including landscape impact, while also considering flood risk. Without this policy provision, these considerations would not receive the policy protection that they require. Additionally, by dealing with specific forms of visitor accommodation, the policy provides greater policy requirement clarity for such proposals coming forward.
10a	Positive impact on economic indicators, health and wellbeing and deprivation	+	Permanent	Long Term	Yes, other employment and live well locally policies in the plan	Policy option to be carried forward together with Options 10c and 10f in Policy ECO9: A policy would maximise the LPA's capacity to secure LESP's from suitable developments, which are an important means by which the Plan can help to improve training and skills levels, as well as securing employment for local residents. A policy would also make the process more automatic, and therefore less dependent on the proactiveness of Council staff in Regeneration, which is a measure of individual employees rather than a Council wide system of notification.
10b	No, neutral on all indicators. No significant impacts.	○	No impact	N/A	Yes, other employment and live well locally policies in the plan	Not carried forward - Concern that the lack of policy would reduce the LPA's capacity to secure LESP's from suitable development. For example, and despite the Council's efforts, a LESP was not secured as part of the recent granting of permission (via appeal), with the cited reason that there is no policy requirement at present.
10c	Positive impact on economic indicators, health and wellbeing and deprivation	+	Permanent	Long Term	Yes, other employment and live well locally policies in the plan	Policy option to be carried forward together with Options 10a and 10f in Policy ECO9: Current practices of securing LESP's across a range of development sizes show that requiring LESP's from developments of 10+ dwellings / 1,000sqm+ floorspace is achievable, while this lower threshold is justified on the basis that developments within the rural areas of the district tend to be smaller.
10d	Positive impact on economic indicators, health and wellbeing and deprivation	+	Permanent	Long Term	Yes, other employment and live well locally policies in the plan	Not carried forward - The LESP requirement be financially and organisationally burdensome on developments under this size, while the scale of development would not provide adequate opportunities for employment or training.
10e	Positive impact on economic indicators, health and wellbeing and deprivation	+	Permanent	Long Term	Yes, other employment and live well locally policies in the plan	Not carried forward - The LPA's experience in securing LESP's from development shows that a lower threshold of 10 dwellings and 1,000sqm is achievable. This higher threshold would unnecessarily reduce the number of LESP's that can be secured.

Policy Options	Does this have a significant effect on the SA objective(s), whether positive or negative? (See also the baseline indicators and prompt question)	What is the likely Impact?	Is this a temporary or permanent Impact?	Is this a short term or long term impact?	Are there synergies between other policies (or options) which might amplify the effect?	Commentary/Notes (Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score)
10f	Positive impact on economic indicators, health and wellbeing and deprivation	+	Permanent	Long Term	Yes, other employment and live well locally policies in the plan	Policy option to be carried forward together with Options 10a and 10c in Policy ECO9: The function of contributions is to cover the Council's costs in the implementation of each LESP. It has been shown to be a minimal cost as part of overall development costs, while successfully able to cover the Council's role. No other options are therefore proposed.
11a	No major impacts apart from a slight positive impact on landscape character	o	Permanent	Long Term	Yes, green to the core and landscape polices in the Plan will amplify the impact	Policy option to be carried forward in Policy ECO7: The smaller than average size of agricultural landholdings within Rother means that there is a risk of new, suitable agricultural buildings necessary to support agriculture being outside the criteria of permitted development rights. At the same time, it is considered that it is essential to support the viability of farming and land-based industries given its role in preservation of Rother's landscapes.
11b	No, neutral on all indicators. No significant impacts.	○	No impact	N/A	Yes, green to the core and landscape polices in the Plan will amplify the impact	Not carried forward - For the reasons cited above, this may reduce the ability of agricultural activities to remain viable, given that many farms in the area may be smaller than is required by the criteria of permitted development.
12a	Some negative impacts on landscape but overall neutral on impacts	+	Permanent	Long Term	Yes, green to the core and landscape polices in the Plan will amplify the impact	Policy option to be carried forward in Policy ECO8: A dedicated policy establish a distinct policy approach from that of policy that is supportive of employment development: Development as part of a diversification scheme would enable more extensive forms of development than would otherwise be accepted outside of Development Boundaries (both in the sense of scale and type of development), on the basis that agricultural diversification schemes would have the primary function of facilitating the continued viability of agricultural activities which are essential to Rother's landscape.
12b	No, neutral on all indicators. No significant impacts.	○	No impact	N/A	Yes, green to the core and landscape polices in the Plan will amplify the impact	Not carried forward - Without specific consideration of the reasons for agricultural diversification, and therefore no separate policy approach, diversification schemes would be determined through less flexible policy, which would act as a restriction on the diversification within the rural economy that needs to happen.
13a	Overall small positive impacts	+	Permanent	Long Term	Yes, green to the core and landscape polices in the Plan will amplify the impact	Policy option to be carried forward in Policy ECO10: There is no evidence to suggest that the overall situation has changed, and therefore no other policy options are proposed.
13b	No, neutral on all indicators. No significant impacts.	○	No impact	N/A	Yes, green to the core and landscape polices in the Plan will amplify the impact	Not carried forward - While equestrian developments are typically small scale, and are rural in character, they still have the individual and cumulative potential to erode the particular character of the District's countryside and landscapes. The detailed criteria within the above policy option consider the specific issues related to these potential development risks, as well as consideration of the welfare of horses. Without this policy provision, these considerations would not receive the policy protection that they require. Additionally, by dealing specifically with equestrian development, the policy provides greater policy requirement clarity for such proposals coming forward.

Development Principles policy areas (where relevant for A Thriving Local Economy Reg 19 chapter)⁴⁰

⁴⁰ See Table in Development Principles included in this Appendix 4.

SA Objective / Draft Policies	1a	2a	3a	5a	6a	7a	8a	8b	9a
1. Reduce air pollution from transport and development and improve air quality.	+	o	+	o	o	o	o	o	o
2. Biodiversity is protected, conserved and enhanced.	o	0	0	0	o	++	++	++	+
3. The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation)	++	++	+	++	++	+	+	++	+
4. Minimise water consumption.	o	o	o	o	o	o	o	o	o
5. Manage and reduce the risk of flooding (fluvial, tidal and surface water), now and in the future, and increase resilience to the wider effects of climate change.	o	o	o	o	o	+	+	+	+
6. The risk of coastal erosion is managed and reduced, now and in the future.	o	o	o	o	o	o	o	o	o
7. The health and well-being of the population is improved and inequalities in health are reduced.	+	o	o	o	++	+	+	+	+
8. More opportunities are provided for everyone to in a suitable home to meet their needs.	o	+	0	+	o	o	o	o	o
9. All sectors of the community have improved accessibility to services, facilities, jobs, and social and cultural opportunities.	o	o	o	o	o	o	o	o	o
10. Safe and secure environments are created and there is a reduction in crime and fear of crime.	o	o	o	o	o	o	o	o	o
11. Historic environment/ townscape is protected, enhanced and made more accessible.	o	+	0	o	o	o	o	o	+
12. The risk of pollution to land and soils is reduced and quality is improved.	o	o	o	o	o	o	o	o	o
13. Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced.	o	+	++	o	o	o	o	o	o
14. The risk of pollution to water is reduced and water quality is improved.	o	o	o	o	o	o	o	o	o
15. Ensure that Parks, gardens and countryside are protected, enhanced and made more accessible.	o	o	o	o	o	++	+	++	++
16. Economic performance is improved.	o	o	o	o	o	o	o	o	o
17. There are high and stable levels of employment and diverse employment opportunities for all.	o	o	o	o	o	o	o	o	o
18. Levels of poverty and social exclusion are reduced, and the deprivation gap is closed in the more deprived areas.	o	o	o	o	o	o	o	o	o
19. Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve.	o	o	o	o	o	o	o	o	o
20. Road congestion levels are reduced and there is less car dependency and greater travel choice.	o	o	o	o	o	o	o	o	o
SCORING	4	4	4	3	4	7	6	8	7

Policy Options	Does this have a significant effect on the SA objective(s), whether positive or negative? (See also the baseline indicators and prompt question)	What is the likely Impact?	Is this a temporary or permanent Impact?	Is this a short term or long term impact?	Are there synergies between other policies (or options) which might amplify the effect?	Commentary/Notes (Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score)
1a	Yes, positive in climate change mitigation and health and wellbeing	+	Permanent	Long Term	Yes, synergies with other green to the core and live well locally policies which amplify the effect	Carry forward policy option into Policy GTC1 - Core Strategy policy SRM1: Towards a Low Carbon Future requires for developments over 10 units to provide an energy strategy, ensures all developments meet the prevailing energy standards and pursue low carbon or renewable energy generation and when extending buildings to apply the prevailing standards to the whole building. DaSA policy DRM3: Energy Requirements lowers the requirement by changing the minimum number of dwellings from 10 to 100 dwellings. New policy 'Net Zero Development Building Standards' introduces standards for operational energy, embodied carbon and whole life carbon and is the preferred option in place of the existing policies. The SA indicates that the policy will have a positive impact on all relevant objectives.
2a	Yes, positive in climate change mitigation, housing and environmental indicators	+	Permanent	Long Term	Yes, synergies with other green to the core and live well locally policies which amplify the effect	Carry forward policy option into Policy GTC2 - Core Strategy policy SRM1: Towards a Low Carbon Future encourages applications for extensions to apply the prevailing efficiency standards to the entire building. The new policy gives significant weight to proposals which result in considerable improvements to the energy efficiency of the building and requires <i>all</i> schemes to provide an energy statement as well as meeting BREEAM Excellent for developments over 10 dwellings. The new policy will have a positive impact on the sustainability objectives as demonstrate in the SA appraisal table.
3a	Yes, positive in environmental and recycling indicators	+	Permanent	Long Term	Yes, synergies with development based policies and live well locally, which amplify the effect	Carry forward policy option into Policy GTC3 - This is a new policy topic, the only existing related policy is in the ESCC Waste and Minerals Plan. The policy has a positive impact on our objectives and does not replace or update existing Rother policy.
5a	Yes, positive in climate change mitigation and housing	+	Permanent	Long Term	Yes, synergies with green to the core and development policies which amplify the effect	Carry forward policy option into Policy GTC5 - DaSA policies DRM2: Renewable Energy Developments and DRM3: Energy Requirements make recommendations for renewable and low carbon energies, however this policy is recommended as it expressly supports heat networks, which earlier policies have not done.
6a	Yes, positive in climate change mitigation and health and wellbeing	+	Permanent	Long Term	Yes, synergies with green to the core and live well locally policies which amplify the effect	Carry forward policy option into Policy GTC6 - This policy places more emphasis on renewable energy generation than previous polices (DRM2, DRM3), giving specific requirements for solar, wind and energy storage, whereas the earlier policies. The policy has a positive impact on the sustainability objectives and the preferred option is for it to replace the existing policies.
7a	Yes, strong positive impacts in biodiversity and landscape impacts	+	Permanent	Long Term	Yes, synergies with green to the core policies which amplify the effect	Carry forward policy option into Policy GTC7 – The Environment Act places a duty on local authorities to have regard to Local Nature Recovery Strategies and to create more, bigger, better and connected areas of wildlife rich habitat benefiting nature and people. This policy places great emphasis on the East Sussex strategy and ensures development accords with it, which has significant long term sustainability advantages.
8a	Yes, strong positive biodiversity and environmental impacts	+	Permanent	Long Term	Yes, synergies with green to the core and live well locally policies which amplify the effect	Do not carry forward – Whilst equal in sustainability score as option 8b this option would have maximum impacts against each positive objective. Whilst this is the national policy position, the Council has provided evidence that it should push higher to 20% in order to better respond to the climate emergency and reflect the step change required in biodiversity improvements
8b	Yes, strong positive biodiversity and environmental impacts	+	Permanent	Long Term	Yes, synergies with green to the core and live well locally policies which amplify the effect	Carry forward policy option into Policy GTC8 - This policy places emphasis on ensuring that a suitable level of biodiversity net gain is delivered to maximise, based on overall viability the positive long term impacts of development. This will ensure that true biodiversity gains can be made and a step change can be delivered to meet the overall green to the core ambitions of the Local Plan.

9a	Yes, strong positive impacts on environmental indicators and heritage	+	Permanent	Long Term	Yes, synergies with all policies in the plan that relate to development HWNL	Carry forward policy option into Policy GTC9 – The policy places emphasis on the importance of the High Weald national landscape as a context setting for other policies in the Local Plan. This has strong positive sustainability impacts which are long term and there are clear synergies with several other policies in the plan which relate to development within the High Weald area. Therefore overall the effect is amplified.
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Live Well Locally

SA Objective / Draft Policies	1a	1b	2a	2b	3a	3b	4a	4b	5a	5b	6a	6b	7a	7b
1. Reduce air pollution from transport and development and improve air quality.	-	-	o	-	++	+	o	o	o	o	+	o	-	o
2. Biodiversity is protected, conserved and enhanced.	+	+	+	+	+	+	+	+	+	+	+	+	+	+
3. The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation)	o	o	+	o	+	+	+	o	+	o	+	o	+	o
4. Minimise water consumption.	o	o	o	o	o	o	o	o	o	o	o	o	o	o
5. Manage and reduce the risk of flooding (fluvial, tidal and surface water), now and in the future, and increase resilience to the wider effects of climate change.	o	o	o	o	o	o	o	o	o	o	+	o	o	o
6. The risk of coastal erosion is managed and reduced, now and in the future.	o	o	o	o	o	o	o	o	o	o	o	o	o	o
7. The health and well-being of the population is improved and inequalities in health are reduced.	+	+	++	+	+	+	+	o	+	o	+	o	+	o
8. More opportunities are provided for everyone to in a suitable home to meet their needs.	++	+	+	o	+	+	o	o	o	o	o	o	o	o
9. All sectors of the community have improved accessibility to services, facilities, jobs, and social and cultural opportunities.	+	+	++	o	+	+	+	o	o	o	o	o	o	o
10. Safe and secure environments are created and there is a reduction in crime and fear of crime.	+	+	+	+	+	+	+	o	++	o	++	o	+	o
11. Historic environment/ townscape is protected, enhanced and made more accessible.	+	o	+	o	o	o	+	o	+	o	o	o	o	o
12. The risk of pollution to land and soils is reduced and quality is improved.	o	o	o	o	o	o	o	o	o	o	o	o	o	o
13. Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced.	o	o	o	o	o	o	o	o	o	o	o	o	o	o
14. The risk of pollution to water is reduced and water quality is improved.	o	o	o	o	o	o	o	o	o	o	o	o	o	o
15. Ensure that Parks, gardens and countryside are protected, enhanced and made more accessible.	+	o	++	o	o	o	+	o	+	o	+	o	o	o
16. Economic performance is improved.	+	o	+	o	o	o	o	o	o	o	o	o	+	o
17. There are high and stable levels of employment and diverse employment opportunities for all.	+	o	+	o	o	o	o	o	o	o	o	o	+	o
18. Levels of poverty and social exclusion are reduced, and the deprivation gap is closed in the more deprived areas.	+	o	++	o	+	+	+	o	+	o	+	o	+	o
19. Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve.	+	o	+	o	o	o	o	o	o	o	o	o	o	o

SA Objective / Draft Policies	1a	1b	2a	2b	3a	3b	4a	4b	5a	5b	6a	6b	7a	7b
20. Road congestion levels are reduced and there is less car dependency and greater travel choice.	o	o	o	o	++	++	o	o	o	o	o	o	o	o
SCORING	11	4	16	2	11	10	8	1	8	1	9	1	6	1

Development Principles - Policy Areas 1 and 2 (Draft Local Plan 2024) brought into Live Well Locally chapter

SA Objective / Draft Policies	DEV 1	No DEV 1	DEV 2	No DEV 2
1. Reduce air pollution from transport and development and improve air quality.	-	-	-	-
2. Biodiversity is protected, conserved and enhanced.	++	+	++	+
3. The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation)	+	o	+	o
4. Minimise water consumption.	o	o	o	o
5. Manage and reduce the risk of flooding (fluvial, tidal and surface water), now and in the future, and increase resilience to the wider effects of climate change.	+	o	+	o
6. The risk of coastal erosion is managed and reduced, now and in the future.	o	o	o	o
7. The health and well-being of the population is improved and inequalities in health are reduced.	+	o	+	o
8. More opportunities are provided for everyone to in a suitable home to meet their needs.	++	o	++	o
9. All sectors of the community have improved accessibility to services, facilities, jobs, and social and cultural opportunities.	+	o	++	o
10. Safe and secure environments are created and there is a reduction in crime and fear of crime.	+	o	++	o
11. Historic environment/ townscape is protected, enhanced and made more accessible.	+	o	++	o
12. The risk of pollution to land and soils is reduced and quality is improved.	o	o	+	o
13. Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced.	-	-	-	-
14. The risk of pollution to water is reduced and water quality is improved.	-	-	-	-
15. Ensure that Parks, gardens and countryside are protected, enhanced and made more accessible.	+	o	++	o
16. Economic performance is improved.	+	o	++	o

SA Objective / Draft Policies	DEV 1	No DEV 1	DEV 2	No DEV 2
17. There are high and stable levels of employment and diverse employment opportunities for all.	+	o	++	o
18. Levels of poverty and social exclusion are reduced, and the deprivation gap is closed in the more deprived areas.	+	o	+	o
19. Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve.	+	o	++	o
20. Road congestion levels are reduced and there is less car dependency and greater travel choice.	o	o	-	-
SCORING	12	-3	19	-3

SA Objective / Draft Policies	2A	2B	2C	2D	2E	3A	3B	3C	4A	6A
1. Reduce air pollution from transport and development and improve air quality.	++	++	+	+	+	○	○	○	○	○
2. Biodiversity is protected, conserved and enhanced.	++	++	+	+	+	○	○	○	○	○
3. The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation)	++	++	+	+	+	○	○	○	○	+
4. Minimise water consumption.	+	+	+	+	+	○	○	○	○	○
5. Manage and reduce the risk of flooding (fluvial, tidal and surface water), now and in the future, and increase resilience to the wider effects of climate change.	+	+	+	+	+	○	○	○	○	+
6. The risk of coastal erosion is managed and reduced, now and in the future.	○	○	○	○	○	○	○	○	○	○
7. The health and well-being of the population is improved and inequalities in health are reduced.	++	++	+	+	+	+	+	++	+	+
8. More opportunities are provided for everyone to in a suitable home to meet their needs.	++	++	+	+	+	○	○	○	○	○
9. All sectors of the community have improved accessibility to services, facilities, jobs, and social and cultural opportunities.	++	++	+	+	+	○	○	○	++	+
10. Safe and secure environments are created and there is a reduction in crime and fear of crime.	++	++	+	+	+	○	○	○	○	○
11. Historic environment/ townscape is protected, enhanced and made more accessible.	○	○	○	○	○	○	○	○	○	○
12. The risk of pollution to land and soils is reduced and quality is improved.	+	+	+	+	+	○	○	○	○	○
13. Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced.	○	○	○	○	○	○	○	○	○	○
14. The risk of pollution to water is reduced and water quality is improved.	○	○	○	○	○	○	○	○	○	○
15. Ensure that Parks, gardens and countryside are protected, enhanced and made more accessible.	++	++	+	+	+	○	○	○	+	++
16. Economic performance is improved.	+	+	+	+	+	○	○	○	○	○
17. There are high and stable levels of employment and diverse employment opportunities for all.	++	++	+	+	+	○	○	○	○	○
18. Levels of poverty and social exclusion are reduced, and the deprivation gap is closed in the more deprived areas.	++	++	+	+	+	○	○	○	+	○
19. Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve.	++	++	+	+	+	○	○	○	○	○
20. Road congestion levels are reduced and there is less car dependency and greater travel choice.	++	++	+	+	+	○	○	○	○	+
SCORING	28	28	16	16	16	1	1	2	5	7

Policy Options	Does this have a significant effect on the SA objective(s), whether positive or negative? (See also the baseline indicators and prompt question)	What is the likely Impact?	Is this a temporary or permanent Impact?	Is this a short term or long term impact?	Are there synergies between other policies (or options) which might amplify the effect?	Commentary/Notes (Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score)
1a	Yes, a strong positive option in terms of housing and economic objectives, as well as deprivation and protecting countryside	++	Permanent	Long Term	Yes, synergies with many policy areas in housing, green to the core and other live well locally policies	Carry forward policy option into Policy LWL1 – prescribed densities for specific areas in the district is considered justified based on the evidence base, specifically the Council's density study. This promotes good design and efficient use of land within the district in sustainable locations. There are positive long term sustainability impacts, with clear synergies with other policies in the live well locally chapter than amplify the impact.
1b	Yes, but without prescribed density less positive on potential impact on heritage and countryside	+	Permanent	Long Term	General synergies with other policies (same as Option 1a), but less of an impact	Do not carry forward this approach – whilst NPPF policies would apply to allow for sustainable development it is considered that an evidence based approach on density, and clear direction through local policy (Option 1a) is beneficial. This has less of a sustainability impact compared to Option 1a and as such should not be carried forward.
2a	Yes, strong positive option in relation to accessibility of services and economic objectives, as well as open space provision	++	Permanent	Long Term	Yes, strong synergies with housing and economic policies as well as other live well locally policies	Carry forward policy option into Policy LWL2 – strong positive policy in relation to ensuring development takes place in sustainable locations, with appropriate access to open and amenity space, with opportunities for indoor space. This would have cumulative benefits and there are clear synergies with other live well locally policies as well as impacting future decisions on planning allocations for the Local Plan at the next stage.
2b	Fairly neutral with a couple of positives, no strong positives as would be reliant on national policy	+	Permanent	Long Term	Yes, synergies with the same policy areas as Option 2a, but no strong amplified impacts as only relying on national policy	Do not carry forward this approach – whilst NPPF policies would apply to allow for sustainable development, it is considered that the proposed policy (Option 2a) would ensure truly sustainable development which is required to meet the ambitions and objectives of the Local Plan. This scores significantly lower than Option 2a on its long term impacts and as such should not be carried forward.
3a	Yes, strong positive impacts on sustainable transport and environmental objectives	++	Permanent	Long Term	Yes, synergies with other live well locally policies which amplify its effects	Carry forward policy option into Policy LWL3 – both elements of the two policy options (3a and 3b) are required under separate policies to cover the requirements to consider sustainable transport opportunities within and outside the development site to ensure overall sustainable development. These can provide separate policies to ensure clarity for planning applications.
3b	Yes, strong positive impacts on sustainable transport and environmental objectives	+	Permanent	Long Term	Yes, synergies with other live well locally policies which amplify its effects	Carry forward policy option into Policy LWL4 - both elements of the two policy options (3a and 3b) are required under separate policies to cover the requirements to consider sustainable transport opportunities within and outside the development site to ensure overall sustainable development. These can provide separate policies to ensure clarity for planning applications.
4a	Yes, positive impacts on health and wellbeing and other environmental indicators	+	Permanent	Long Term	Yes, synergies with other live well locally policies which amplify its effects	Carry forward policy option into Policy LWL5 – The policy truly reflects the distinctive place that Rother is and makes sure applications respond to the local character and context, strong design, and other considerations which ensure the overall sustainability and suitability of development within the context of Rother. This policy has strong synergies and links to other live well locally policies and ensures overall sustainable development.
4b	Neutral impacts overall, as relying on national policy	o	Permanent	Long Term	Yes, synergies with the same policy areas as Option 4a, but no strong amplified impacts as only relying on national policy	Do not carry forward this approach – This would not adequately be covered in national policies in the NPPF and as such a local policy is required and justified. This only scores neutrally in the sustainability appraisal for its long term impacts and the approach to reply on national policies should not be carried forward.
5a	Yes, positive impacts on health and wellbeing and other environmental indicators	+	Permanent	Long Term	Yes, synergies with other live well locally policies which amplify its effects	Carry forward policy option into Policy LWL6 – A strong positive policy to ensure that built form reflects the important design criteria that make it appropriate and add to its setting in the built environment. This has clear synergies with other live well locally policies which help to amplify its effect.
5b	Neutral impacts overall, as relying on national policy	o	Permanent	Long Term	Yes, synergies with the same policy areas as Option 5a, but no strong amplified impacts as only relying on national policy	Do not carry forward this approach - This would not adequately be covered in national policies in the NPPF and as such a local policy is required and justified. This only scores neutrally in the sustainability appraisal for its long term impacts and the approach to reply on national policies should not be carried forward.

6a	Yes, positive impacts on health and wellbeing and other environmental indicators	+	Permanent	Long Term	Yes, synergies with other policies in live well locally and green to the core which amplify its effects	Carry forward policy option into Policy LWL7- A positive policy that is necessary to support the design and use of streets within and associated with development sites. This provides much greater emphasis than general design principles in the NPPF, is therefore considered necessary and appropriate in line with other supportive policies in the live well locally chapter.
6b	Neutral impacts overall, as relying on national policy	o	Permanent	Long Term	Yes, but not amplified impacts as reliance on national policy	Do not carry forward this approach - This would not adequately be covered in national policies in the NPPF and as such a local policy is required and justified. This only scores neutrally in the sustainability appraisal for its long term impacts and the approach to rely on national policies should not be carried forward.
7a	Yes, positive impacts on health and wellbeing and safe/inclusion indicators	+	Permanent	Long Term	Yes, synergies with other policies in live well locally which amplify its effects	Carry forward policy option into Policy LWL8 – A positive policy that reflects the specific policy needs for parking provision for sustainable forms such as cycling and supporting infrastructure provision including green spaces. This is a specific policy area that requires a devoted policy and there are no reasonable alternatives.
7b	Neutral impacts overall, as relying on national policy	o	Permanent	Long Term	Yes, but not amplified impacts as reliance on national policy	Do not carry forward this approach – this would not help to deliver the specific requirements of Option 7b and would not be covered in the necessary detail in national policies. This only scores neutrally in the sustainability appraisal for its long term impacts and the approach to rely on national policies should not be carried forward.

Development Principles policy areas (where relevant for Live Well Locally Reg 19 chapter)⁴¹

Health and Wellbeing policy areas (where relevant for Live Well Locally Reg 19 chapter)

Policy Options	Does this have a significant effect on the SA objective(s), whether positive or negative? (See also the baseline indicators and prompt question)	What is the likely Impact?	Is this a temporary or permanent Impact?	Is this a short term or long term impact?	Are there synergies between other policies (or options) which might amplify the effect?	Commentary/Notes (Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score)
2A	Yes, significant positive impacts overall	++	Permanent	Long Term	Yes, live well locally and other health and wellbeing policies. There are similar benefits between other options in this policy area and elements will need to be combined to make the most effective policy that is capable of being implemented. This will further amplify the impact of this policy.	This policy option will be combined with other options and carried forward in proposed Policy HWB2 – the opportunity for commercial and non-domestic planning applications to undertake a HIA assessment has positive outcomes in ensuring health and wellbeing wider benefits can be maximised. There is scope to include the impact of larger developments with residential to formulate a stronger planning policy for major development.
2B	Yes, significant positive impacts overall	++	Permanent	Long Term	Yes, live well locally and other health and wellbeing policies. There are similar benefits between other options in this policy area and elements will need to be combined to make the most effective policy that is capable of being implemented. This will further amplify the impact of this policy.	This policy will not be carried forward due to difficulty with implementation - the opportunity for major planning applications to undertake a HIA assessment has positive outcomes in ensuring health and wellbeing wider benefits can be maximised on a significant amount of applications. This will have short term through to long term impacts on all members of community. Although a strong positive option, it is impractical to apply this to all major developments, there the threshold will need to be increased
2C	Yes, significant positive impacts overall	++	Permanent	Long Term	Yes, live well locally and other health and wellbeing policies. There are similar benefits between other options in this policy area and elements will need to be combined to make the most effective policy that is capable of being implemented. This will further amplify the impact of this policy.	This policy option will be combined with other options and carried forward in proposed Policy HWB2 – the opportunity for large scale developments to undertake a HIA assessment has positive outcomes in ensuring health and wellbeing wider benefits can be maximised. These are the types of development that due to their scale and in combination effects can have a significant impact and positive amplified impacts on health and wellbeing.
2D	Yes. significant positive impacts overall	++	Permanent	Long Term	Yes, live well locally and other health and wellbeing policies. There are similar benefits between other options in this policy area and elements will need to be combined to make the most effective policy that is capable of being	This policy option will be combined with other options and carried forward in proposed Policy HWB2 – This policy option has significant long term impacts, by focusing attention on the most deprived areas of the district and assessing the impacts of development to ensure

⁴¹ See Table in Development Principles included in this Appendix 4.

Policy Options	Does this have a significant effect on the SA objective(s), whether positive or negative? (See also the baseline indicators and prompt question)	What is the likely Impact?	Is this a temporary or permanent Impact?	Is this a short term or long term impact?	Are there synergies between other policies (or options) which might amplify the effect?	Commentary/Notes (Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score)
					implemented. This will further amplify the impact of this policy.	health and wellbeing impacts are addressed where they will make the most impact. Whilst the policy will not apply to all developments in the deprived areas, screening will allow any significant issues to be addressed and for HIA to be applied if necessary.
2E	Yes positive impacts overall, as national policies in the NPPF would still apply.	++	Permanent	Long Term	There are other supportive policies within the health and wellbeing chapter, but the absence of HIA policy relies on other policies being in place and held strongly in the determination of planning applications. National policies in the NPPF would still apply to support health and wellbeing.	This policy approach will not be carried forward - The long term impact could be that the wider determinants of health and wellbeing could be missed, and there is a lost opportunity to strengthen the positive impacts of planning applications on the health and wellbeing of the wider community.
3A	Neutral overall impacts, but significant health and wellbeing benefits	○	Permanent	Long Term	There are direct synergies between the HIA policy options which would amplify the impacts	This policy option will be combined with other options and carried forward in proposed Policy HWB3 – There are long term impacts of this policy option in addressing the specific issues in Sidley, however it is felt that these issues could be dealt with at district scale. There are other areas of the district where deprivation and health of communities is an issue and as such should be addressed more strategically.
3B	Neutral overall impacts, but significant health and wellbeing benefits	○	Permanent	Long Term	There are direct synergies between the HIA policy options which would amplify the impacts	This policy option will be combined with other options and carried forward in proposed Policy HWB3 – There are long term impacts on health associated with this option and this meets best practice under national policy and guidance. Significant cumulative impacts with the HIA policy options.
3C	Neutral overall impacts, but significant health and wellbeing benefits	○	Permanent	Long Term	There are direct synergies between the HIA policy options which would amplify the impacts	This policy option will be combined with other options and carried forward in proposed Policy HWB3 – There are long term positive impacts if a variety of potentially harmful uses are taken account of, and this strengthens the policy when combining it with other options. A more strategic approach can be taken to those uses which may impact physical and mental health.
4A	Yes, positive impacts overall	+	Permanent	Long Term	Direct synergies between community policy in development principles section, addition of text in policy to ensure that new development stays in community use, ie. conditions to remove permitted development rights	This policy option will be carried forward in proposed Policy HWB4 – There are long term positive impacts of this policy in supporting new community development and ensuring that they are retained and not lost to other uses. This ensures positive impacts for the lifetime of the Local Plan and not just short term.
6A	Yes, positive impacts overall	+	Permanent	Long Term	No specific direct links with other policies in the Local Plan, this is a new policy which stands on its own to protect public rights of way.	This policy option will be carried forward in proposed Policy HWB6 – A positive new policy that is required to support the protection of public rights of way, provides a long term strategy for the duration of the Local Plan.

Natural and Historic Environment

Environmental Management - Policy Areas 1, 2, 3, 4, 5, 6 and 7 (Draft Local Plan 2024) brought into Natural and Historic Environment chapter

SA Objective / Draft Policies	1a	2a	3a	3b	4a	5a	5b	5c	6a	7a
1. Reduce air pollution from transport and development and improve air quality.	○	○	○	○	○	○	○	○	○	++
2. Biodiversity is protected, conserved and enhanced.	++	+	○	○	○	○	○	○	++	+
3. The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation)	○	○	○	○	○	○	○	○	○	○
4. Minimise water consumption.	○	+	+	++	○	○	○	○	○	○
5. Manage and reduce the risk of flooding (fluvial, tidal and surface water), now and in the future, and increase resilience to the wider effects of climate change.	++	++	○	○	+	++	++	+	+	○
6. The risk of coastal erosion is managed and reduced, now and in the future.	+	○	○	○	++	++	++	++	○	○
7. The health and well-being of the population is improved and inequalities in health are reduced.	○	○	○	○	○	○	+	○	○	○
8. More opportunities are provided for everyone to in a suitable home to meet their needs.	○	○	○	○	○	○	○	○	○	○
9. All sectors of the community have improved accessibility to services, facilities, jobs, and social and cultural opportunities.	○	○	○	○	○	○	○	○	○	○
10. Safe and secure environments are created and there is a reduction in crime and fear of crime.	○	○	○	○	○	○	○	○	○	○
11. Historic environment/ townscape is protected, enhanced and made more accessible.	○	○	○	○	○	○	○	○	○	○
12. The risk of pollution to land and soils is reduced and quality is improved.	○	○	○	○	○	○	○	○	○	+
13. Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced.	○	○	○	○	○	○	○	○	○	○
14. The risk of pollution to water is reduced and water quality is improved.	+	++	○	○	○	○	○	○	○	+
15. Ensure that Parks, gardens and countryside are protected, enhanced and made more accessible.	++	+	○	○	+	+	++	+	++	++
16. Economic performance is improved.	○	○	○	○	○	○	○	○	○	○
17. There are high and stable levels of employment and diverse employment opportunities for all.	○	○	○	○	○	○	○	○	○	○
18. Levels of poverty and social exclusion are reduced, and the deprivation gap is closed in the more deprived areas.	○	○	○	○	○	○	○	○	○	○
19. Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve.	○	○	○	○	○	○	○	○	○	○
20. Road congestion levels are reduced and there is less car dependency and greater travel choice.	○	○	○	○	○	○	○	○	○	○
SCORING	8	7	1	2	4	5	7	4	5	7

Green to the Core – Policy Areas 4 and 9 (Draft Local Plan 2024) brought into Natural and Historic Environment chapter⁴²

Heritage – Policy Areas 1, 2 and 3 (Draft Local Plan 2024) brought into Natural and Historic Environment chapter

SA Objective / Draft Policies	HER1	No HER1	HER2	No HER2	HER3	No HER3
1. Reduce air pollution from transport and development and improve air quality.	o	o	o	o	o	o
2. Biodiversity is protected, conserved and enhanced.	o	o	o	o	o	o
3. The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation)	o	o	o	o	o	o
4. Minimise water consumption.	o	o	o	o	o	o
5. Manage and reduce the risk of flooding (fluvial, tidal and surface water), now and in the future, and increase resilience to the wider effects of climate change.	o	o	o	o	o	o
6. The risk of coastal erosion is managed and reduced, now and in the future.	o	o	o	o	o	o
7. The health and well- being of the population is improved and inequalities in health are reduced.	o	o	o	o	o	o
8. More opportunities are provided for everyone to in a suitable home to meet their needs.	o	o	o	o	o	o
9. All sectors of the community have improved accessibility to services, facilities, jobs, and social and cultural opportunities.	o	o	o	o	o	o
10. Safe and secure environments are created and there is a reduction in crime and fear of crime.	o	o	o	o	o	o
11. Historic environment/ townscape is protected, enhanced and made more accessible.	++	+	++	+	++	+
12. The risk of pollution to land and soils is reduced and quality is improved.	o	o	o	o	o	o
13. Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced.	o	o	o	o	o	o
14. The risk of pollution to water is reduced and water quality is improved.	o	o	o	o	o	o
15. Ensure that Parks, gardens and countryside are protected, enhanced and made more accessible.	+	+	+	+	+	+
16. Economic performance is improved.	+	+	+	+	+	+
17. There are high and stable levels of employment and diverse employment opportunities for all.	o	o	o	o	o	o
18. Levels of poverty and social exclusion are reduced, and the deprivation gap is closed in the more deprived areas.	o	o	o	o	o	o

⁴² See Table in Green to the Core included in this Appendix 4

SA Objective / Draft Policies	HER1	No HER1	HER2	No HER2	HER3	No HER3
19. Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve.	o	o	o	o	o	o
20. Road congestion levels are reduced and there is less car dependency and greater travel choice.	o	o	o	o	o	o
SCORING	4	3	4	3	4	3

Landscape Character – Policy Areas 1, 2 and 3 (Draft Local Plan 2024) brought into Natural and Historic Environment chapter

SA Objective / Draft Policies	1A	1B	2A	2B	3A	3B
1. Reduce air pollution from transport and development and improve air quality.	+	o	0	0	0	0
2. Biodiversity is protected, conserved and enhanced.	++	+	++	+	++	+
3. The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation)	0	0	+	o	0	0
4. Minimise water consumption.	0	0	0	0	0	0
5. Manage and reduce the risk of flooding (fluvial, tidal and surface water), now and in the future, and increase resilience to the wider effects of climate change.	+	o	+	o	0	0
6. The risk of coastal erosion is managed and reduced, now and in the future.	+	o	+	o	0	0
7. The health and well-being of the population is improved and inequalities in health are reduced.	0	0	+	o	+	o
8. More opportunities are provided for everyone to in a suitable home to meet their needs.	0	0	0	0	0	0
9. All sectors of the community have improved accessibility to services, facilities, jobs, and social and cultural opportunities.	0	0	0	0	0	0
10. Safe and secure environments are created and there is a reduction in crime and fear of crime.	0	0	0	0	0	0
11. Historic environment/ townscape is protected, enhanced and made more accessible.	0	0	0	0	0	0
12. The risk of pollution to land and soils is reduced and quality is improved.	0	0	0	0	0	0
13. Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced.	0	0	0	0	0	0
14. The risk of pollution to water is reduced and water quality is improved.	0	0	0	0	0	0
15. Ensure that Parks, gardens and countryside are protected, enhanced and made more accessible.	+	o	+	+	+	o
16. Economic performance is improved.	+	o	0	0	+	o
17. There are high and stable levels of employment and diverse employment opportunities for all.	0	0	0	0	0	0

SA Objective / Draft Policies	1A	1B	2A	2B	3A	3B
18. Levels of poverty and social exclusion are reduced, and the deprivation gap is closed in the more deprived areas.	0	0	0	0	0	0
19. Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve.	0	0	0	0	0	0
20. Road congestion levels are reduced and there is less car dependency and greater travel choice.	0	0	0	0	0	0
SCORING	7	1	7	1	5	1

Health and Wellbeing – Policy Areas 5, 6 and 7 (Draft Local Plan 2024) brought into Natural and Historic Environment chapter

SA Objective / Draft Policies	5A	6A	7A
1. Reduce air pollution from transport and development and improve air quality.	+	○	○
2. Biodiversity is protected, conserved and enhanced.	+	○	++
3. The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation)	○	+	○
4. Minimise water consumption.	○	○	○
5. Manage and reduce the risk of flooding (fluvial, tidal and surface water), now and in the future, and increase resilience to the wider effects of climate change.	+	+	+
6. The risk of coastal erosion is managed and reduced, now and in the future.	○	○	○
7. The health and well-being of the population is improved and inequalities in health are reduced.	++	+	+
8. More opportunities are provided for everyone to in a suitable home to meet their needs.	○	○	○
9. All sectors of the community have improved accessibility to services, facilities, jobs, and social and cultural opportunities.	+	+	+
10. Safe and secure environments are created and there is a reduction in crime and fear of crime.	○	○	○
11. Historic environment/ townscape is protected, enhanced and made more accessible.	○	○	○
12. The risk of pollution to land and soils is reduced and quality is improved.	+	○	○
13. Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced.	○	○	○
14. The risk of pollution to water is reduced and water quality is improved.	○	○	○
15. Ensure that Parks, gardens and countryside are protected, enhanced and made more accessible.	++	++	++
16. Economic performance is improved.	○	○	○
17. There are high and stable levels of employment and diverse employment opportunities for all.	○	○	○

SA Objective / Draft Policies	5A	6A	7A
18. Levels of poverty and social exclusion are reduced, and the deprivation gap is closed in the more deprived areas.	○	○	○
19. Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve.	○	○	○
20. Road congestion levels are reduced and there is less car dependency and greater travel choice.	○	+	○
SCORING	9	7	7

Environmental Management

Policy Options	Does this have a significant effect on the SA objective(s), whether positive or negative? (See also the baseline indicators and prompt question)	What is the likely Impact?	Is this a temporary or permanent Impact?	Is this a short term or long term impact?	Are there synergies between other policies (or options) which might amplify the effect?	Commentary/Notes (Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score)
1A	Yes, water themed objective and other environmental objectives	+	Permanent	Long Term	Yes, strong synergies between green to the core and other environmental policies which amplify the effect	This policy option is carried forward in Policy ENV2: This policy option intends to strengthen the existing DaSA policy DEN5 with guidance provided from the Lead Local Flood Authority and Natural England. As such, this policy option is recommended.
2A	Yes, water themed objective and other environmental objectives	+	Permanent	Long Term	Yes, strong synergies between green to the core and other environmental policies. Important considerations for development strategy which amplify the effect	This policy option is carried forward in Policy ENV1: Through taking direction from existing Core Strategy policies SRM2, EN6 and EN7, this proposed policy option aims to create a more overarching policy on the themes and is therefore recommended.
3A	Small positive impacts, most neutral impacts	+	Permanent	Long Term	Yes, strong synergies between green to the core and other environmental policies which amplify the effect	Not carried forward - This policy option is designed to satisfy the requirement in building regulations to reduce water consumption from 125 litres per person per day to 110, mirroring the existing DaSA policy DRM1. It is not recommended to take forward this policy option for the reasons explained below.
3B	Small positive impacts, most neutral impacts	+	Permanent	Long Term	Yes, strong synergies between green to the core and other environmental policies which amplify the effect	This policy option is carried forward in Policy GTC4: This policy option looks to enhance the water efficiency policy by drawing on the supporting text to the DaSA policy DRM1. This is in line with the Council's wider ambitions of the Plan. As such, it is recommended to take this policy option forward.
4A	Yes, water themed objective and other environmental objectives	+	Permanent	Long Term	Yes, strong synergies between green to the core and other environmental policies which amplify the effect	This policy option is carried forward in Policy ENV3: This policy option is recommended as it looks to broadly carry forward the DaSA policy DEN6 but modified slightly to not conflict with the proposed policy for Coastal Change Management Areas.
5A	Yes, water themed objective and other environmental objectives	+	Permanent	Long Term	Yes, strong synergies between green to the core and other environmental policies which amplify the effect	This policy option is carried forward in Policy ENV4: Based on the NPPF and PPG, this policy looks to restrict certain types of development in an area of land most at risk from coastal processes.
5B	Yes, water themed objective and other environmental objectives	+	Permanent	Long Term	Yes, strong synergies between green to the core and other environmental policies which amplify the effect	Not carried forward – Although this option scored the highest in sustainability terms of the options, it is not practical to carry forward this policy at the present time as further work would be required to identify the scope of the area that would be included. The priority area for inclusion is the Fairlight area where there is no active coastal protection measures through the Shoreline Management Plans.
5C	Yes, water themed objective and other environmental objectives	+	Permanent	Long Term	Yes, strong synergies between green to the core and other environmental policies which amplify the effect	Not carried forward - Based on the NPPF and PPG, this policy looks to restrict certain types of development in an area of land most at risk from coastal processes.
6A	Yes, biodiversity objective and other environmental objectives	+	Permanent	Long Term	Yes, strong synergies between green to the core and other environmental policies which amplify the effect	This policy option is carried forward in Policy ENV5: This policy option is recommended as it builds on the existing Core Strategy policies EN5 and EN6 as well as DaSA policy DEN4. The enhancements are based on evidence bases as well as advice from external organisations.

7A	Yes, biodiversity objective and other environmental objectives	+	Permanent	Long Term	Yes, strong synergies between green to the core and other environmental policies which amplify the effect	This policy option is carried forward in Policy ENV7: Taking the existing DaSA policy DEN7, this policy option looks to take the latest guidance available to make the policy up to date. As such, it is recommended to take this policy option forward.
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Heritage

Policy Options	Does this have a significant effect on the SA objective(s), whether positive or negative? (See also the baseline indicators and prompt question)	What is the likely Impact?	Is this a temporary or permanent Impact?	Is this a short term or long term impact?	Are there synergies between other policies (or options) which might amplify the effect?	Commentary/Notes (Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score)
HER1	Yes, positive impact on a few objectives, neutral on the majority. Positive in relation to historic environment and economic objectives	+	Permanent	Long Term	Yes, synergies with policies in the live well locally chapter, which amplify the effects	This policy option is carried forward in Policy HER1 – This policy option is carried forward from the adopted plan and is still fit for purpose, subject to small changes and clarification which are detailed in the proposed policy. This has a positive long term impact on a number of objectives, and there are synergies with policies in the live well locally in relation to protecting the distinct design and character of local areas and built form.
No HER1	Yes, but only slight positive. Neutral on most and would be dependent on national policies in the NPPF	+	Permanent	Long Term	Yes, synergies with policies in the live well locally chapter, which amplify the effects	Not carried forward – this option would reply on the strength of national policy in the NPPF to cover the requirements for planning applications. This is not felt a sustainable or practical option as there is local distinctiveness which needs to be taken account of. Whilst there is protection afforded with national policy, more detailed requirements as outlined in the proposed policy is justified and appropriate to be brought forward in the Local Plan.
HER2	Yes, positive impact on a few objectives, neutral on the majority. Positive in relation to historic environment and economic objectives	+	Permanent	Long Term	Yes, synergies with policies in the live well locally and economy chapter, which amplify the effects	This policy option is carried forward in Policy HER2 - This policy option is carried forward from the adopted plan and is still fit for purpose. This has a positive long term impact on a number of objectives, and there are synergies with policies in the live well locally and economy in relation to protecting the distinct design and character of local areas and built form, as well as protecting rural economies
No HER2	Yes, but only slight positive. Neutral on most and would be dependent on national policies in the NPPF	+	Permanent	Long Term	Yes, synergies with policies in the live well locally and economy chapter, which amplify the effects	Not carried forward - this option would reply on the strength of national policy in the NPPF to cover the requirements for planning applications. This is not felt a sustainable or practical option as historic farmsteads is a specific issue for Rother District which needs to be taken account of.
HER3	Yes, positive impact on a few objectives, neutral on the majority. Positive in relation to historic environment and economic objectives	+	Permanent	Long Term	Yes, synergies with policies in the live well locally chapter, which amplify the effects	This policy option is carried forward in Policy HER3 - This policy option is carried forward from the adopted plan and is still fit for purpose, s. This has a positive long term impact on a number of objectives, and there are synergies with policies in the live well locally in relation to protecting the distinct design and character of local areas and built form.
No HER3	Yes, but only slight positive. Neutral on most and would be dependent on national policies in the NPPF environment and economic objectives	+	Permanent	Long Term	Yes, synergies with policies in the live well locally chapter, which amplify the effects	Not carried forward - this option would reply on the strength of national policy in the NPPF to cover the requirements for planning applications. More detailed requirements as outlined in the proposed policy is justified and appropriate to be brought forward in the Local Plan.

Landscape Character

Policy Options	Does this have a significant effect on the SA objective(s), whether positive or negative? (See also the baseline indicators and prompt question)	What is the likely Impact?	Is this a temporary or permanent Impact?	Is this a short term or long term impact?	Are there synergies between other policies (or options) which might amplify the effect?	Commentary/Notes (Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score)
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⁴³ See Table in Green to the Core included in this Appendix 4

1a	Yes, positive policy in terms of landscape, and other environmental objectives. Neutral in others	+	Permanent	Long Term	Yes, other policies in the landscape and green to the core chapters will amplify the effect	Policy option to be carried forward in Policy LAN1: The policy updates the Core Strategy policy EN1: Landscape Stewardship by introducing a paragraph on the impact of development. Designated landscapes continue to be protected by the policy. The SA indicates that the policy will have a positive long term impact on all relevant objectives.
1b	Not significant, One minor positive environmental objectives, others all neutral	+	Permanent	Long Term	Related to other Local Plan policies, but dependent on NPPF policies	Not carried forward – sustainability effects are generally neutral with one positive. The NPPF policies alone will not afford the amount of policy protection required. Rother has justified reasons to have supporting local policies on the issue as provided in Policy Option 1a.
2a	Yes, positive policy in terms of landscape, and other environmental objectives. Neutral in others	+	Permanent	Long Term	Yes, other policies in the landscape and green to the core chapters will amplify the effect	Policy option to be carried forward in Policy LAN2: This is a new policy created to increase protection of these landscape features both within urban and rural locations. The policy also introduces the CAVAT system to monetise the amenity value of a tree or groups of trees. The SA indicates that the policy will have a positive long term impact on the relevant objectives.
2b	Not significant, One minor positive environmental objectives, others all neutral	+	Permanent	Long Term	Related to other Local Plan policies, but dependent on NPPF policies	Not carried forward – sustainability effects are generally neutral with one positive. The NPPF policies alone will not afford the amount of policy protection required. Rother has justified reasons to have supporting local policies on the issue as provided in Policy Option 2a.
3a	Yes, positive policy in terms of landscape, and other environmental objectives. Neutral in others	+	Permanent	Long Term	Yes, other policies in the landscape and green to the core chapters will amplify the effect	Policy option to be carried forward in Policy LAN3: This is a new policy, expanding on previous night sky protection in DaSA policy DEN7: Environmental Pollution which aimed to minimise light pollution. The new policy is far more prescriptive in stating the types of lighting that must be avoided and the areas of protection that lighting must address. The SA indicates that the policy will have a positive long term impact on the relevant objectives.
3b	Not significant, One minor positive environmental objectives, others all neutral	+	Permanent	Long Term	Related to other Local Plan policies, but dependent on NPPF policies	Not carried forward – sustainability effects are generally neutral with one positive. The NPPF policies alone will not afford the amount of policy protection required. Rother has justified reasons to have supporting local policies on the issue as provided in Policy Option 3a.

Health and Wellbeing policy areas (where relevant for Natural and Historic Environment Reg 19 chapter)

Policy Options	Does this have a significant effect on the SA objective(s), whether positive or negative? (See also the baseline indicators and prompt question)	What is the likely Impact?	Is this a temporary or permanent Impact?	Is this a short term or long term impact?	Are there synergies between other policies (or options) which might amplify the effect?	Commentary/Notes (Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score)
5A	Yes, positive impacts overall	+	Permanent	Long Term	Carries forward existing policy approach, important linkages to infrastructure chapter and green to the core chapter regarding open space and landscape and opportunities for local nature recovery and a wider network.	This policy option will be carried forward in proposed Policy HWB5 – There are no other alternatives for this policy area. This provides a strong long term positive policy to ensure blue and green infrastructure requirements are delivered and areas are protected from loss. String links to other green to the core policy elements of the Local Plan.
6A	Yes, positive impacts overall	+	Permanent	Long Term	No specific direct links with other policies in the Local Plan, this is a new policy which stands on its own to protect public rights of way.	This policy option will be carried forward in proposed Policy HWB6 – A positive new policy that is required to support the protection of public rights of way, provides a long term strategy for the duration of the Local Plan.
7A	Yes, positive impacts overall	+	Permanent	Long Term	This policy is for a specific designated area, and sits alongside other policies in relation to green to the core in relation to landscape and open space. These help further support the protection of the Combe valley area.	This policy option will be carried forward in proposed Policy HWB7 – A positive policy that slightly updates the existing policy for the designated site. No policy alternatives to consider under this policy area.

SA Objective / Draft Policies	DEV 1	No DEV 1	DEV 2	No DEV 2	DEV 3	No DEV 3	DEV 4	No DEV 4	DEV 5	No DEV 5	DEV 6	No DEV 6
1. Reduce air pollution from transport and development and improve air quality.	-	-	-	-	-	-	-	-	-	-	-	-
2. Biodiversity is protected, conserved and enhanced.	++	+	++	+	++	+	o	o	+	+	++	+
3. The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation)	+	o	+	o	o	o	o	o	+	o	+	o
4. Minimise water consumption.	o	o	o	o	o	o	o	o	-	-	o	o
5. Manage and reduce the risk of flooding (fluvial, tidal and surface water), now and in the future, and increase resilience to the wider effects of climate change.	+	o	+	o	+	o	o	o	+	o	o	o
6. The risk of coastal erosion is managed and reduced, now and in the future.	o	o	o	o	o	o	o	o	o	o	o	o
7. The health and well-being of the population is improved and inequalities in health are reduced.	+	o	+	o	o	o	+	o	+	o	++	o
8. More opportunities are provided for everyone to in a suitable home to meet their needs.	++	o	++	o	+	o	o	o	++	o	o	o
9. All sectors of the community have improved accessibility to services, facilities, jobs, and social and cultural opportunities.	+	o	++	o	o	o	++	-	o	o	o	o
10. Safe and secure environments are created and there is a reduction in crime and fear of crime.	+	o	++	o	o	o	+	o	+	o	o	o
11. Historic environment/ townscape is protected, enhanced and made more accessible.	+	o	++	o	+	o	+	o	+	o	o	o
12. The risk of pollution to land and soils is reduced and quality is improved.	o	o	+	o	o	o	o	o	o	o	o	o
13. Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced.	-	-	-	-	o	o	o	o	-	-	o	o
14. The risk of pollution to water is reduced and water quality is improved.	-	-	-	-	o	o	o	o	-	-	o	o
15. Ensure that Parks, gardens and countryside are protected, enhanced and made more accessible.	+	o	++	o	++	+	o	o	+	o	++	o
16. Economic performance is improved.	+	o	++	o	+	o	++	-	+	o	o	o
17. There are high and stable levels of employment and diverse employment opportunities for all.	+	o	++	o	+	o	++	-	+	o	o	o
18. Levels of poverty and social exclusion are reduced, and the deprivation gap is closed in the more deprived areas.	+	o	+	o	o	o	+	o	+	o	o	o
19. Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve.	+	o	++	o	+	o	++	-	+	o	o	o
20. Road congestion levels are reduced and there is less car dependency and greater travel choice.	o	o	-	-	o	o	o	o	-	-	o	o

⁴⁴ These policy areas were considered in the Draft Local Plan (2024) and Interim SA (2024) have been brought into various sections of the Regulation 19 Local Plan, as noted elsewhere in this report. The full table is presented here for ease of reference.

SA Objective / Draft Policies	DEV 1	No DEV 1	DEV 2	No DEV 2	DEV 3	No DEV 3	DEV 4	No DEV 4	DEV 5	No DEV 5	DEV 6	No DEV 6
SCORING	12	-3	19	-3	9	1	11	-5	9	-4	6	0

Environmental Management

Policy Options	Does this have a significant effect on the SA objective(s), whether positive or negative? (See also the baseline indicators and prompt question)	What is the likely Impact?	Is this a temporary or permanent Impact?	Is this a short term or long term impact?	Are there synergies between other policies (or options) which might amplify the effect?	Commentary/Notes (Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score)
DEV1	Yes, significant positive impacts.	++	Permanent	Long Term	Yes, strongly related to Live Well locally chapter policies.	The long term impacts of this policy are in relation to residential amenity and meeting the needs of occupiers (including access), ensuing development fits in which its local context, therefore is an important positive policy for planning applications and development to take account of.
No DEV1	No, slight negative. NPPF policies would be in place.	-	Permanent	Long Term	N/A, would have to reply on national policies in the NPPF	Without the policy there may be some long term impacts on residential amenity and character of the local area, although NPPF policies should ensure sustainable development is delivered.
DEV2	Yes, significant positive impacts.	++	Permanent	Long Term	Yes, strongly related to Live Well locally chapter policies and sets principles important to housing and economy policies in the Local Plan	This policy will have a strong positive impact, and will amplify the impacts of housing, employment and general development policies in the Local Plan through setting important guiding principles to ensure sites are considered in their whole, are well connected and master planned. This has long term impacts on the quality and success of development.
No DEV2	No, slight negative. NPPF policies would be in place.	-	Permanent	Long Term	N/A, would have to reply on national policies in the NPPF	Without the policy there may be some long term impacts on built character of the local area, although NPPF policies should ensure sustainable development is delivered.
DEV 3	Yes	+	Permanent	Long Term	Yes, development strategy, sub areas and isolated development in the countryside	This policy has a positive long term impact. Short term no change proposed until new Local Plan is adopted and revisions are made to the defined boundaries. Longer term it will help to direct development and make clear where development is acceptable or in open countryside in principle.
No DEV3	No, neutral impact	o	Permanent	Long Term	Yes, development strategy, sub areas and isolated development in the countryside	Without development boundaries the principle of development location would be considered on a site by site basis. Long term impacts on the development strategy and where development should be focused and impact on isolated development in the countryside.
DEV 4	Yes, strong positive impacts	++	Permanent	Long Term	Yes, supportive and linked policies in economy section of the Local Plan. There is consistency between the policy aims and objectives.	The policy has a strongly positive long term impact in ensuring that uses are viable, creating places with vitality and making sure community facilities or places with economic value are protected unless they are unviable. There are positive cumulative impacts for policies in the economy of the Local Plan.
No DEV4	Yes, negative impact	-	Permanent	Long Term	N/A, would have to reply on national policies in the NPPF	Without the policy the protection of sites for community and economic value are weakened, although NPPF policies should ensure sustainable development is delivered.
DEV 5	Yes	+	Permanent	Long Term	Yes, supportive and linked policies in the housing chapter of the Local Plan, Supportive of windfall development coming forward as part of the Council's proposed development strategy	This policy has a positive long term impact. Longer term it will help to ensure development comes forward on sustainable smaller sites and where development not identified in the Council's is acceptable on brownfield or greenfield sites. Supports the Council's proposed development strategy and housing policies in the Local Plan.
No DEV5	Yes, negative impact	-	Permanent	Long Term	N/A, would have to reply on national policies in the NPPF	Without the policy there may be some long term impacts on built character of the local area. The policy allows greater opportunity for development to come forward

Policy Options	Does this have a significant effect on the SA objective(s), whether positive or negative? (See also the baseline indicators and prompt question)	What is the likely Impact?	Is this a temporary or permanent Impact?	Is this a short term or long term impact?	Are there synergies between other policies (or options) which might amplify the effect?	Commentary/Notes (Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score)
					which supports 10% of delivery on smaller sites	on smaller sites, rather than dependency on larger sites which are more constrained in greenfield settings, especially in the High Weald national landscape.
DEV6	Yes	+	Permanent	Long Term	Yes, directly linked to development strategy and green to the core and landscape policies of the Local Plan	This policy has a positive long term impact. Longer term it will help to ensure areas of important landscape value are safeguarded and avoid inappropriate urban sprawl into green areas. It also helps protect the character and quality of the High Weald national landscape
No DEV6	No, neutral impact	o	Permanent	Long Term	N/A, would have to rely on national policies in the NPPF	Overall neutral impact, with policies in the NPPF ensuring inappropriate development is minimised. Without a specific policy areas of higher landscape value are potentially at risk, but national policies should protect sites.

Appendix 5:

Template for SA of the site allocation policies and alternatives

Criteria	Significant positive	Minor positive	Neutral or uncertain	Minor negative	Significant negative	Data sources	Notes
Scoring key	++	+	0	-	--		
SA1: Reduce air pollution from transport and development and improve air quality							
1a. Settlement sustainability	Site located in 'highly sustainable' location (Blue)	Site located in 'sustainable' or 'moderately' sustainable location (Dark and light green)	Site located in 'potentially sustainable' location (Yellow)	Site located in 'low sustainable' location (Orange)	Site located in 'not sustainable' location (Red)	Rother Settlement Study (Regulation 18 Version – April 2024), Figure 12	If site is not in a settlement used in the study, marked as '0' (neutral / uncertain)
1b. Air Quality Management Area	N/A	N/A	N/A	N/A	N/A	Rother Annual Air Quality Status Report (2024)	There are no AQMAs in Rother, so not currently appraised – to keep under review.
SA2: Biodiversity is protected, conserved and enhanced							
2a. Site of Special Scientific Interest (SSSI) Impact Risk Zone	N/A	N/A	Site not located within an IRZ	Site located in an IRZ (relevant use, i.e. residential or commercial, depending on proposed use for site)	Site located in a SSSI	GIS Natural England, Impact Risk Zones mapping	This tool is used for LPAs to understand when to consult Natural England on planning applications.
2b. Ancient woodland	N/A	N/A	Site is not adjacent to (over 50 metres from) ancient woodland	Site is adjacent to (within 50 metres of) ancient woodland	Site contains ancient woodland	GIS Natural England/Defra Ancient Woodland mapping	
2c. Tree Protection Order	N/A	N/A	Site does not contain a TPO	Site contains a TPO	N/A	GIS	

Criteria	Significant positive	Minor positive	Neutral or uncertain	Minor negative	Significant negative	Data sources	Notes
Scoring key	++	+	0	-	--		
2d. Priority Habitats	N/A	N/A	Site is not adjacent to AND does not contain priority habitat	Site is adjacent to priority habitat	Site contains priority habitat	GIS Natural England, England Priority Habitats mapping	Officer discretion used to determine whether a site is (or is not) 'adjacent to' priority habitat.
SA3: The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation)							
3a. Decentralised energy	N/A	Site located within a potential heat network cluster	Site not located within a potential heat network cluster	N/A	N/A	GIS Rother Climate Change Study – Net Zero Carbon Evidence Base Report. See Figures: 24, 25, 26, 27	
3b. Settlement sustainability (as per SA1 above)	Site located in 'highly sustainable' location	Site located in 'sustainable' or 'moderately' sustainable location	Site located in 'potentially sustainable' location	Site located in 'low sustainable' location	Site located in 'not sustainable' location	Rother Settlement Study (Regulation 18 Version – April 2024), Figure 12	
SA4: Minimise water consumption							
This SA objective is screened out of the site assessment. Water consumption / water efficiency standards are dealt with through Development Management policies and Building Regulations.							
SA5: Manage and reduce the risk of flooding (fluvial, tidal and surface water), now and in the future, and increase resilience to the wider effects of climate change.							
5.a EA Flood Risk Map	N/A	N/A	Flood Zone 1	Flood Zone 2	Flood Zone 3	GIS Environment Agency Flood Map for Planning mapping and Rother SFRA	

Criteria	Significant positive	Minor positive	Neutral or uncertain	Minor negative	Significant negative	Data sources	Notes
Scoring key	++	+	0	-	--		
5.b Surface water flood risk	N/A	Contains land with no risk.	Contains land with low risk (0.1%-1% AEP)	Contains land with medium risk (1.1%-3.3% AEP)	Contains land with high risk (>3.3% AEP)	GIS Environment Agency Flood Map for Planning mapping and Rother SFRA	The assessment included an allowance for the impact of climate change. (Environment Agency data, March 2025)
5.c Groundwater flood risk	N/A	Groundwater levels are more than 5 m below the ground surface.	Groundwater levels are between 0.5m and 5m below the ground surface.	Groundwater levels are between 0.025m and 0.5m below the ground surface.	Water levels are either at or very near (within 0.025m of) the ground surface	GIS Environment Agency Flood Map for Planning mapping and Rother SFRA	
SA6: The risk of coastal erosion is managed and reduced, now and in the future.							
6.a Coastal Change Management Area	N/A	N/A	Site is not within a CCMA	Site located within CCMA but for appropriate uses, as defined by NPPF/G	Site located CCMA but for inappropriate uses, as defined by NPPF/G	PPG on appropriate uses Draft Rother Local Plan (April 2024), Policy ENV4 and Figure 43.	The CCMA will be defined through the plan process. For this exercise, the CCMA is per the draft Rother Local Plan (2024).
SA7: The health and well-being of the population is improved and inequalities in health are reduced							
7.a Access to essential services	Site in settlement with very good access to essential services (Score 5)	Site in settlement with good access to essential services (Score 4)	Site in settlement with moderate access to essential services (Score 3)	Site in settlement with limited access to essential services (Score 2)	Site in settlement with very limited or no access to essential services (Score 1 or Score 0)	Rother Settlement Study (Regulation 18 Version – April 2024), Essential Services Scoring, Figure 3 and 12	This criterion extracts the 'essential services' assessment from the Settlement Study

Criteria	Significant positive	Minor positive	Neutral or uncertain	Minor negative	Significant negative	Data sources	Notes
Scoring key	++	+	0	-	--		
7.b Access to public open space	N/A	Site within 400m of a public open space of any type	N/A	Site not within 400m of a public open space of any type	N/A	GIS Open Space Sport and Recreation Study, 2007	Measured “as the crow flies”. Open space publicly and freely accessible (e.g. excludes school playing fields, private golf courses, etc.).
7.c Access to Public Right of Way	N/A	Site within 400m of a PRow	N/A	Site not within 400m of a PRow	N/A	GIS	Measured “as the crow flies”.
SA8: More opportunities are provided for everyone to in a suitable home to meet their needs							
This SA objective is screened out of the site assessment. It is assumed that housing site allocations will boost housing supply and improve access to housing and therefore have positive effects.							
SA9: All sectors of the community have improved accessibility to services, facilities, jobs, and social and cultural opportunities							
9.a Settlement sustainability (as per SA1 above)	Site located in ‘highly sustainable’ location	Site located in ‘sustainable’ or ‘moderately’ sustainable location	Site located in ‘potentially sustainable’ location	Site located in ‘low sustainable’ location	Site located in ‘not sustainable’ location	Rother Settlement Study (Regulation 18 Version – April 2024), Figure 12	
SA10: Safe and secure environments are created and there is a reduction in crime and fear of crime.							
This SA objective is screened out of the site assessment. Design standards and guidelines for safe and secure environments are dealt with through Development Management policies and Building Regulations.							
SA11: Historic environment/ townscape is protected, enhanced and made more accessible							
11.a Heritage assets	N/A	N/A	Designated heritage asset(s) neither within nor adjacent to the site	Designated heritage asset(s) adjacent to the site	Designated heritage asset(s) within the site	GIS	This includes: Conservation Areas, Listed buildings, scheduled monuments, registered parks/gardens, battlefield and

Criteria	Significant positive	Minor positive	Neutral or uncertain	Minor negative	Significant negative	Data sources	Notes
Scoring key	++	+	0	-	--		
							protected wreck sites.
11.b Area of archaeological potential	N/A	N/A	Site outside archaeological notification area	Site within archaeological notification area	N/A	GIS	
SA12: The risk of pollution to land and soils is reduced and quality is improved							
12.a Agricultural land classification	N/A	Very Poor (Grade 5) quality	Poor (Grade 4) quality	Good (Grade 3a) or Moderate (Grade 3b) quality	Excellent (Grade 1) or Very Good (Grade 2) quality	GIS Natural England, Provisional Agricultural Land Classification mapping	N/A scored if classification does not apply (e.g. urban)
SA13: Through waste reuse, recycling and minimisation, the amount of waste for disposal is reduced							
This SA objective is screened out of the site assessment. Design standards and guidelines for waste management are dealt with through Development Management policies and Building Regulations.							
SA14: The risk of pollution to water is reduced and water quality is improved							
14.a Source Protection Zone	N/A	N/A	Site does not contain land within a SPZ.	Site contains land within SPZ2 or SPZ3	Site contains land contains land within SPZ1	GIS Government Magic Maps	
SA15: Ensure that Parks, gardens and countryside are protected, enhanced and made more accessible							
15.a National Landscape – relative location	N/A	N/A	Site is located outside the National Landscape and its setting	Site is located adjacent to or in the setting of the National Landscape	Site is located within National Landscape	GIS	Officer discretion used to determine whether a site is within the setting of the HWNL.
15.b National Landscape - sensitivity (applies only to sites in the	N/A	No impact	Low impact	Medium impact	High impact	High Weald AONB (National Landscape)	

Criteria	Significant positive	Minor positive	Neutral or uncertain	Minor negative	Significant negative	Data sources	Notes
Scoring key	++	+	0	-	--		
National Landscape)						Management Plan. HELAA Landscape Sensitivity Assessment (if available) or officer assessment, informed by HWNL management plan, Market Towns and Villages Landscape Assessment (2009), Bexhill and Hastings Fringes Landscape Assessment (2008) and any other relevant assessments.	
15.c Landscape sensitivity (applies only to sites outside the National Landscape)	N/A	No impact	Low impact	Medium impact	High impact	HELAA Landscape Sensitivity Assessment (if available), or officer assessment, informed by Market Towns and Villages Landscape	Landscape sensitivity derived through officer assessment.

Criteria	Significant positive	Minor positive	Neutral or uncertain	Minor negative	Significant negative	Data sources	Notes
Scoring key	++	+	0	-	--		
						Assessment (2009), Bexhill and Hastings Fringes Landscape Assessment (2008) and any other relevant assessments.	
15.d Type of land	Site is fully brownfield land	Site is predominantly brownfield land	Site is a mix of greenfield and brownfield land	Site is predominantly greenfield land	Site is fully greenfield land	Site survey / HELAA information	Using the NPPF definition of previously developed land/brownfield meaning agricultural buildings are greenfield.
SA16: Economic performance is improved							
This SA objective is screened out of the site assessment. Indicators for economic performance makes it difficult to differentiate between site assessments.							
SA17: There are high and stable levels of employment and diverse employment opportunities for all							
17.a Existing Employment or commercial uses	N/A	N/A	The site does not contain an existing employment or commercial use	Part of the site is occupied by an existing employment or commercial use, together with another use (i.e. mixed use)	Site is wholly occupied by an existing employment or commercial use	Site survey / HELAA	Negative scoring for loss of employment or commercial uses.
17.b New or replacement employment or commercial uses only	N/A	The site does not contain an existing employment or commercial use and will include a new such use by	The site contains an existing employment or commercial use that will be replaced by such	N/A	N/A	Site survey / HELAA	Neutral and positive scoring for replacement or new employment use

Criteria	Significant positive	Minor positive	Neutral or uncertain	Minor negative	Significant negative	Data sources	Notes
Scoring key	++	+	0	-	--		
<i>(N/A if site does not propose new or replacement employment or commercial use).</i>		the site allocation	a use by the site allocation				
SA18: Levels of poverty and social exclusion are reduced, and the deprivation gap is closed in the more deprived areas							
This SA objective is screened out of the site assessment. Indicators for poverty and social exclusion make it difficult to differentiate between site assessments.							
SA19: Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve.							
This SA objective is screened out of the site assessment. Indicators for skills and education make it difficult to differentiate between site assessments.							
SA20: Road congestion levels are reduced and there is less car dependency and greater travel choice							
20.a Public transport access	Site within a settlement with access to multiple train stations and good bus services (Score 5)	Site within a settlement with access to a train station and good bus service OR with access to either a train station or good bus service (Score 4 and Score 3)	Site within a settlement with access to an average bus service (Score 2)	Site within a settlement with access to an infrequent bus service (Score 1)	Site within a settlement with access to only limited or no bus services (Score 0)	Rother Settlement Study (Regulation 18 Version – April 2024), Public Transport Scoring, Figure 8 and 12	
20.b Public transport access - Bexhill Parish	Site within 800m of Bexhill train station (or N/A if not in Bexhill Parish)	Site within 800m of a Collington, Cooden Beach, or Norman's Bay train stations (or N/A if not in Bexhill Parish)	Site is not within 800m of a train station (or N/A if not in Bexhill Parish)	N/A	N/A	GIS	Distance measured "as the crow flies". Criterion applies only to Bexhill Parish sites.

Appendix 6:
SA of the rejected (excluded) HELAA sites

Bexhill – residential

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
Bexhill																												
Central Urban Area																												
No rejected sites in this area.																												
Suburban Area																												
BEX0097 – Land east of Filsham Drive		++	-	-	0	-	0	++	0	+	-	0	++	+	+	++	-	0	-	0	0	N/A	-	--	0	N/A	++	0
BEX0110 – Land adjoining Pebsham Rural Business Park, Pebsham Lane		++	-	0	0	0	0	++	0	--	-	0	++	+	+	++	0	0	-	0	0	N/A	-	--	0	N/A	++	0
BEX0111 – Land between 18 – 20 Collington Park Crescent		++	0	0	0	0	0	++	0	--	+	0	++	+	+	++	0	0	N/A	0	0	N/A	0	--	0	N/A	++	+
BEX0049 – Land at Highwoods Avenue		+	-	0	-	0	0	+	0	0	+	0	+	+	+	+	0	0	0	0	0	N/A	-	0	0	N/A	+	0
BEX0075 – Woodsgate Place, Gunters Lane		++	0	0	-	0	0	++	0	+	+	0	++	+	+	++	0	0	N/A	0	0	N/A	-	+	0	N/A	++	0
BEX0133 – Land adjacent to Holly Close		+	-	-	0	--	0	+	0	0	+	0	+	+	+	+	0	0	0	0	0	N/A	-	--	0	N/A	+	0
BEX0249 – Land at Broad Oak Park (larger site)		+	-	0	0	-	0	+	0	--	+	0	+	+	+	+	0	0	0	0	0	N/A	-	0	-	0	+	0
West Bexhill Area																												
BEX0050 – Land south of Barnhorn Road (south-west)		+	-	0	0	--	0	+	--	--	+	0	+	-	+	+	-	0	-	0	0	N/A	-	--	0	N/A	+	0
BEX0109 – Land at Coast Road, Normans Bay		-	-	0	0	--	0	-	--	-	+	0	--	+	+	-	0	0	0	0	0	N/A	--	--	0	N/A	+	+
BEX0123 – Land at The Cedars, Sandhurst Lane		+	-	0	-	0	0	+	0	+	+	0	+	+	+	+	-	0	--	0	0	N/A	-	0	0	N/A	+	0
BEX0124 – Land at The Piggeries, The Bungalow, Sandhurst Lane	-	+	-	0	0	--	0	+	--	+	+	0	+	+	+	+	0	0	0	0	0	N/A	0	0	-	N/A	+	0
BEX0128 – Picknill Green Farm Buildings, Sandhurst Lane		+	-	0	0	--	0	+	--	-	+	0	+	+	+	+	0	0	0	0	0	N/A	0	--	0	N/A	+	0
BEX0206 – Land at Gotham Farm (west), Sandhurst Lane		+	-	0	0	0	0	+	--	--	+	0	+	+	+	+	0	0	0	0	0	N/A	--	--	0	N/A	+	0
BEX0207 – Kloofs Caravan Park, Sandhurst Lane		+	-	-	0	-	0	+	--	--	+	0	+	+	+	+	0	0	0	0	0	N/A	--	0	--	N/A	+	0
BEX0213 – Land south of Barnhorn Road (west)		+	-	0	0	-	0	+	0	-	+	0	+	+	+	+	-	0	-	0	0	N/A	--	--	0	N/A	+	0
BEX0094 - Kites Nest and Wet Woods, land west of Spring Lane and Cowdray Park Road		+	-	--	-	--	0	+	--	--	+	0	+	+	+	+	0	0	0	0	0	N/A	-	--	0	N/A	+	0
North Bexhill Area																												
BEX0211 – Land at Chestnut Meadow Caravan Park, Ninfield Road		-	-	-	0	--	0	-	0	--	+	0	--	+	+	-	0	0	0	0	0	N/A	-	0	-	N/A	+	0
BEX0228 – Land north of Bexhill Enterprise Park, Haven Brook Avenue		+	-	--	0	--	0	+	0	--	+	0	+	+	+	+	0	0	-	0	0	N/A	--	--	0	N/A	+	0
BEX0183 – Land at Pebsham Farm (south)		++	-	0	0	--	0	++	--	--	+	0	++	+	+	++	0	0	-	0	0	N/A	--	--	0	N/A	++	0
BEX0184 – Land at Pebsham Farm (central)		++	-	0	0	0	0	++	--	+	+	0	++	+	+	++	0	0	-	0	0	N/A	--	--	0	N/A	++	0
BEX0185 – Land at Pebsham Farm (north)		++	--	0	0	--	0	++	--	--	+	0	++	+	+	++	0	0	0	0	0	N/A	--	--	0	N/A	++	0

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
BEX0204 – Land at Scallets Wood House, St Mary’s Lane		+	-	0	0	--	0	+	0	--	+	0	+	+	+	+	0	0	0	0	0	N/A	-	-	0	N/A	+	0
BEX0162 – Land at Lunsfords Cross, Ninfield Road (north side)		-	-	0	0	0	0	-	0	+	+	0	--	+	+	-	0	0	-	0	0	N/A	-	--	0	N/A	+	0
BEX0086 – Land at Sidley Car Park, Ninfield Road		+	0	0	0	0	+	+	0	--	+	0	+	+	+	+	0	0	N/A	0	0	N/A	0	++	0	N/A	+	0

Bexhill – economic

SA Objective	Indicative floorspace	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
Bexhill																												
BEX0186 – Land north-west of Bexhill Road, Pebsham		++	-	0	0	0	0	++	0	--	+	0	++	+	+	++	0	0	-	0	0	N/A	-	+	--	0	++	0
BEX0228 – Land north of Bexhill Enterprise Park, Haven Brook Avenue		+	-	--	0	--	0	+	0	--	+	0	+	+	+	+	0	0	-	0	0	N/A	--	--	0	+	+	0

Southern Rother and Hastings Fringes – residential

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
Southern Rother and the Hastings Fringes																												
Crowhurst																												
HAF0011 - Land at Upper Wilting Farm (south)		0	--	--	0	--	0	0	--	--	+	0	0	-	+	0	-	0	-	0	0	N/A	--	--	0	N/A	0	N/A

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
HAF0022 - Land at Upper Wilting Farm (north)		0	-	--	0	--	0	0	--	--	+	0	0	-	+	0	0	0	-	0	0	N/A	-	--	0	N/A	0	N/A
Fairlight																												
FAI0015 - Land north of Battery Hill		0	-	0	0	0	0	0	0	+	+	0	0	+	+	0	-	0	0	0	--	--	N/A	--	0	N/A	+	N/A
FAI0016 - Guestling Telephone Exchange, Pett Road, Friars Hill		-	-	-	0	0	0	-	0	+	+	0	--	+	+	-	0	0	0	0	--	-	N/A	+	0	N/A	0	N/A
Guestling																												
HAF0008 – Land adjacent to Capricorn, Chowns Hill		0	0	0	-	0	0	0	0	+	-	0	-	+	+	0	0	0	0	0	--	-	N/A	--	0	N/A	+	N/A
HAF0014 - Land adjacent to Millward Gardens, Batchelors Bump		-	-	0	0	0	0	-	0	+	-	0	--	-	+	-	0	0	0	0	--	-	N/A	--	0	N/A	+	N/A
HAF0017 - Land at Beechwood, Chowns Hill		0	0	--	0	--	0	0	0	--	+	0	-	-	+	0	0	0	0	0	--	-	N/A	0	0	N/A	+	N/A
HAF0033 - Land at Oak Side Farm, Rock Lane		+	0	--	0	--	0	+	0	--	+	0	+	-	+	+	0	0	-	0	--	-	N/A	-	0	N/A	+	N/A
GUE0021 - Land South of Guestling Hall, Bachelor's Bump		-	-	0	0	-	0	-	0	+	+	0	--	-	+	-	-	0	0	0	--	-	N/A	--	0	N/A	+	N/A
GUE0025 - White Hart Hill, Guestling		-	-	-	0	-	0	-	0	0	+	0	--	-	+	-	0	0	-	0	--	-	N/A	--	0	N/A	+	N/A
GUE0026 - Land behind the White Hart Beefeater, Winchelsea Road		-	-	--	0	--	0	-	0	--	-	0	--	-	+	-	-	0	0	0	--	--	N/A	--	0	N/A	+	N/A
GUE0008 - Land adjacent to Three Oaks Village Hall, Butchers Lane		-	0	0	0	--	0	-	0	0	+	0	--	+	+	-	-	0	0	0	--	-	N/A	--	0	N/A	+	N/A
GUE0016 - Land to the east of Maxfield Lane		-	0	-	0	0	0	-	0	+	-	0	--	+	+	-	0	0	-	0	--	--	N/A	--	0	N/A	+	N/A
GUE0020 - Land west of Fourteen Acre Lane		-	0	0	0	0	0	-	0	--	-	0	--	+	+	-	0	0	-	0	--	-	N/A	--	0	N/A	+	N/A
GUE0027 - Field at Halfhouse, Butchers Lane		-	0	-	0	-	0	-	0	-	+	0	--	+	+	-	0	0	-	0	--	--	N/A	--	0	N/A	+	N/A
Icklesham																												
ICK0002 - Seven Acres, Watermill Lane		0	-	-	0	-	0	0	0	--	0	0	-	+	+	0	0	0	-	0	--	-	N/A	--	0	N/A	+	N/A
ICK0052 – Wicks Field, Main Road		0	-	0	0	0	0	0	0	--	0	0	-	+	+	0	-	0	-	0	--	-	N/A	--	0	N/A	+	N/A
Pett																												
PET0011 - Land at Gatehurst Farm, Pett Road		-	-	0	0	0	0	-	0	+	0	0	-	+	+	-	0	0	-	0	--	--	N/A	--	0	N/A	0	N/A
PET0012 - Land adjacent to Little Fraysland, Pett Road		-	-	0	0	0	0	-	0	+	-	0	-	+	+	-	-	-	-	0	--	--	N/A	--	0	N/A	0	N/A
PET0013 - Land adjacent to Little Buds, Pett Road		-	-	0	0	0	0	-	0	+	+	0	-	-	+	-	-	0	-	0	--	-	N/A	--	0	N/A	0	N/A
PET0014 - Land west of Lunsford Farm, Pett Road		-	-	0	0	--	0	-	0	0	0	0	-	+	+	-	0	0	-	0	--	--	N/A	--	0	N/A	0	N/A
PET0015 - Lower Chick Hill Field, Chick Hill		-	-	0	0	0	0	-	0	+	0	0	--	+	+	-	-	0	-	0	--	-	N/A	--	0	N/A	+	N/A
PET0017 - Land rear of High Elms Farm, Pett Road		-	-	0	0	-	0	-	0	--	+	0	-	+	+	-	0	0	-	0	--	-	N/A	-	0	N/A	0	N/A
PET0020 - Fairlight Wood Camp Site, Watermill Lane		-	-	--	0	--	0	-	0	--	+	0	-	+	+	-	0	0	-	0	--	--	N/A	-	0	N/A	0	N/A
Westfield																												
HAF0002 - Land at Michael Tyler Furniture, Woodlands Way		0	0	-	0	--	0	0	0	0	-	0	-	+	+	0	0	0	-	0	-	N/A	0	++	--	N/A	+	N/A
HAF0013 - Land rear of 70 Westfield Lane		0	-	--	0	--	0	0	0	--	+	0	-	+	+	0	0	0	0	0	-	N/A	-	--	0	N/A	+	N/A
HAF0032 - Land at 56 Westfield Lane		0	-	--	0	--	0	0	0	--	+	0	-	+	+	0	0	0	0	0	-	N/A	-	--	0	N/A	+	N/A

SA Objective		Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing				SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b		
WES0001 - Land west of Cottage Lane		+	0	0	-	--	0	+	0	--	+	0	+	+	+	+	0	-	-	0	--	--	N/A	--	0	N/A	0	N/A		
WES0022 - Field at Thornyridge, Westbrook Lane		+	0	-	0	-	0	+	0	0	+	0	+	-	+	+	0	0	-	0	--	--	N/A	--	0	N/A	0	N/A		
WES0023 - Land at Tanyard Farmhouse, Fishponds Lane		+	0	0	-	--	0	+	0	--	+	0	+	+	+	+	0	-	-	0	--	-	N/A	-	0	N/A	0	N/A		
WES0024 - Land north of Fishponds Lane and east of Workhouse Lane		+	0	0	0	--	0	+	0	--	+	0	+	+	+	+	0	-	-	0	--	-	N/A	--	0	N/A	0	N/A		
WES0031 - Land east of Stonestile Lane		+	0	0	0	0	0	+	0	0	+	0	+	+	+	+	-	-	-	0	--	0	N/A	--	0	N/A	0	N/A		
WES0035 - Land west of Vicarage Lane, Westfield		+	0	-	0	-	0	+	0	--	+	0	+	+	+	+	-	-	-	0	--	--	N/A	--	0	N/A	0	N/A		
WES0039 - Land opposite St John the Baptist Church, Vicarage Lane, Westfield		+	0	-	0	0	0	+	0	+	+	0	+	+	+	+	-	-	-	0	--	--	N/A	--	0	N/A	0	N/A		
WES0043 - Troyd Farm, Moat Lane		0	0	-	0	0	0	0	0	--	+	0	0	+	+	0	0	0	0	0	--	-	N/A	-	0	N/A	0	N/A		
WES0044 - Land at Thala Farm, Mill Lane		+	0	0	0	0	0	+	0	--	+	0	+	+	+	+	0	0	-	0	--	-	N/A	--	0	N/A	0	N/A		
WES0045 - Moor Farm, Westfield Lane		0	0	0	0	0	0	0	0	--	+	0	0	+	+	0	0	0	-	0	--	--	N/A	--	0	N/A	0	N/A		
WES0047 - Thornyridge, Westbrook Lane		+	0	0	0	-	0	+	0	+	+	0	+	-	+	+	0	0	-	0	--	-	N/A	--	0	N/A	0	N/A		
WES0048 - Land at Westbrook Lane		+	0	0	0	0	0	+	0	+	+	0	+	+	+	+	0	-	-	0	--	-	N/A	--	0	N/A	0	N/A		
WES0049 - Land on east side of Cottage Lane		+	0	0	0	0	0	+	0	0	+	0	+	+	+	+	0	-	-	0	--	0	N/A	--	0	N/A	0	N/A		
WES0050 - Moor Farm - South		+	0	0	0	0	0	+	0	0	+	0	+	+	+	+	0	-	-	0	--	-	N/A	--	0	N/A	0	N/A		
WES0051 - Land at Freshfields Farm, Westfield Lane		0	0	--	0	--	0	0	0	--	-	0	0	+	+	0	0	0	-	0	--	--	N/A	-	-	N/A	0	N/A		
WES0053 - Land south of Vicarage Lane, Westfield		+	0	-	0	-	0	+	0	+	+	0	+	+	+	+	0	-	-	0	--	-	N/A	--	0	N/A	0	N/A		

Southern Rother and Hastings Fringes – economic

SA Objective		Indicative floorspace	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b	
Southern Rother and the Hastings Fringes																													
Guestling																													
HAF0018 - Land north of employment allocation, A265, Ivyhouse Lane		+	-	-	0	--	0	+	0	--	+	0	+	0	+	+	0	0	-	0	--	-	N/A	--	0	+	+	N/A	

Battle and Surrounding Settlements – residential

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
Battle and surrounding settlements																												
Ashburnham																												
ASH0005		--	0	-	0	-	0	--	0	-	0	0	--	-	+	--	-	0	-	0	--	--	N/A	--	0	N/A	--	N/A
Brightling																												
BRI0012		--	0	--	0	--	0	--	0	--	0	0	--	-	+	--	0	0	0	0	--	--	N/A	--	0	N/A	--	N/A
Battle																												
BAT0009		+	0	0	-	--	0	+	0	0	0	0	+	+	-	+	0	-	0	0	--	--	N/A	--	0	N/A	+	N/A
BAT0013		+	0	-	0	-	0	+	0	--	+	0	+	+	-	+	-	0	0	0	--	-	N/A	--	0	N/A	+	N/A
BAT0014		+	0	-	0	-	0	+	0	--	+	0	+	+	+	+	-	0	-	0	--	--	N/A	--	0	N/A	+	N/A
BAT0046		--	-	0	0	0	0	--	0	--	+	0	--	+	+	--	0	0	0	0	--	--	N/A	--	0	N/A	--	N/A
BAT0048		+	0	0	0	0	0	+	0	0	+	0	+	+	+	+	-	-	-	0	--	--	N/A	--	0	N/A	+	N/A
BAT0072		+	0	0	0	-	0	+	0	--	+	0	+	+	+	+	-	0	0	0	--	--	N/A	-	0	N/A	+	N/A
BAT0073		+	0	0	-	0	0	+	0	+	+	0	+	+	+	+	0	-	0	0	--	--	N/A	-	0	N/A	+	N/A
BAT0074		+	0	-	0	--	0	+	0	--	+	0	+	+	+	+	0	0	0	0	--	--	N/A	-	0	N/A	+	N/A
BAT0075		+	0	--	0	--	0	+	0	+	+	0	+	-	+	+	+	0	0	0	--	--	N/A	--	0	N/A	+	N/A
BAT0076		+	0	--	-	--	0	+	0	--	+	0	+	+	+	+	--	-	-	0	--	--	N/A	-	0	N/A	+	N/A
BAT0077		+	0	0	0	-	0	+	0	--	+	0	+	+	+	+	-	-	-	0	--	--	N/A	-	0	N/A	+	N/A
BAT0079		+	0	0	0	-	0	+	0	--	+	0	+	+	+	+	0	-	-	0	--	--	N/A	--	0	N/A	+	N/A
BAT0080		+	0	0	0	--	0	+	0	--	+	0	+	+	+	+	-	0	-	0	--	--	N/A	--	0	N/A	+	N/A
BAT0081		--	0	0	0	0	0	--	0	--	+	0	--	+	+	--	0	0	-	0	--	--	N/A	0	0	N/A	--	N/A
BAT0082		--	0	0	0	-	0	--	0	--	+	0	--	+	+	--	0	0	-	0	--	--	N/A	--	0	N/A	--	N/A
BAT0092		+	0	-	0	-	0	+	0	--	+	0	+	-	-	+	0	0	-	-	--	--	N/A	--	0	N/A	+	N/A
BAT0114		+	0	--	0	--	0	+	0	0	+	0	+	+	+	+	0	0	0	0	--	-	N/A	--	0	N/A	+	N/A
BAT0119		+	0	0	0	--	0	+	0	+	+	0	+	+	+	+	0	0	0	0	--	--	N/A	--	0	N/A	+	N/A
BAT0120		+	0	0	0	0	0	+	0	-	+	0	+	+	+	+	0	-	0	0	--	--	N/A	--	0	N/A	+	N/A
BAT0122		--	0	--	0	--	--	+	0	--	+	0	--	-	+	--	0	0	-	0	--	--	N/A	0	-	0	--	N/A
BAT0125		+	0	0	0	-	0	+	0	--	+	0	+	+	+	+	-	0	0	0	--	--	N/A	--	0	N/A	+	N/A
BAT0127		+	0	-	0	-	0	+	0	--	+	0	+	+	+	+	-	0	-	0	--	-	N/A	--	0	N/A	+	N/A
Catsfield																												
CAT0012		-	0	0	0	0	0	-	0	+	+	0	0	+	+	-	-	0	-	0	--	--	N/A	--	0	N/A	0	N/A
CAT0013		--	0	0	0	--	0	--	0	0	+	0	--	-	+	--	-	0	0	0	--	0	N/A	0	0	N/A	--	N/A
CAT0014		-	0	-	0	-	0	-	0	--	+	0	0	+	+	-	-	0	-	0	-	N/A	-	--	0	N/A	0	N/A
CAT0017		-	0	0	-	-	0	-	0	0	+	0	0	+	+	-	0	0	-	0	--	--	N/A	--	0	N/A	0	N/A
CAT0018		-	0	0	-	-	0	-	0	--	+	0	0	+	+	-	0	0	-	0	--	--	N/A	--	0	N/A	0	N/A
CAT0019		--	0	-	--	-	0	--	0	--	+	0	--	-	+	--	0	0	+	0	--	--	N/A	--	0	N/A	--	N/A
CAT0020		-	0	0	0	0	0	-	0	+	+	0	0	+	+	-	0	0	-	0	--	--	N/A	--	0	N/A	0	N/A
CAT0021		--	0	0	0	0	0	--	0	+	+	0	0	+	+	--	-	0	-	0	--	-	N/A	--	-	0	--	N/A

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
CAT0026		-	0	-	0	-	0	-	0	0	+	0	0	-	-	-	0	0	+	0	--	--	N/A	--	0	N/A	0	N/A
CAT0027		--	0	--	0	--	0	--	0	--	+	0	--	-	+	--	0	0	-	-	--	--	N/A	--	0	N/A	--	N/A
CAT0028		--	-	-	-	--	0	--	0	--	+	0	--	-	+	--	-	0	+	0	--	-	N/A	--	-	0	--	N/A
CAT0030		-	0	0	0	--	0	-	0	0	+	0	0	-	+	-	0	0	0	0	--	--	N/A	--	0	N/A	0	N/A
CAT0031		-	0	0	0	--	0	-	0	0	+	0	0	+	+	-	0	0	-	0	--	-	N/A	--	0	N/A	0	N/A
Dallington																												
DAL0002		-	-	0	0	0	0	-	0	0	+	0	0	+	+	-	-	-	-	0	--	--	N/A	-	0	N/A	--	N/A
Mountfield																												
MOU005		-	0	0	0	0	0	-	--	--	+	0	--	+	+	-	-	0	-	0	--	--	N/A	-	0	N/A	0	N/A
Netherfield																												
BAT0216		-	-	0	0	0	0	-	0	+	+	0	0	+	+	-	-	0	-	0	--	--	N/A	--	0	N/A	--	N/A
BAT0217		--	-	-	0	-	0	--	0	--	+	0	--	-	+	--	0	0	-	0	--	--	N/A	--	0	N/A	--	N/A
BAT0218		-	-	0	0	-	0	-	0	--	+	0	0	+	+	-	0	0	-	0	--	--	N/A	--	0	N/A	--	N/A
BAT0219		--	0	-	0	-	0	--	0	--	+	0	--	+	+	--	-	-	-	0	--	--	N/A	--	0	N/A	--	N/A
BAT0220		-	-	--	0	--	0	-	0	--	+	0	0	+	+	-	-	-	-	0	--	--	N/A	--	0	N/A	--	N/A
Sedlescombe																												
SED0035		--	0	0	0	0	0	--	0	+	+	0	--	-	+	--	0	-	0	0	--	-	N/A	--	0	N/A	--	N/A
SED0041		--	0	0	0	0	0	--	0	--	+	0	--	+	+	--	0	0	-	0	--	--	N/A	-	0	N/A	--	N/A
SED0042		--	0	-	0	--	0	--	0	--	+	0	--	-	+	--	0	0	-	0	--	--	N/A	-	0	N/A	--	N/A
SED0045		--	0	-	0	-	0	--	0	0	+	0	--	-	+	--	0	0	-	0	--	--	N/A	--	0	N/A	--	N/A

Battle and Surrounding Settlements – economic

N/A

SA Objective		Indicative housing units	SA1: Air pollution	SA2: Biodiversity			SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
Rye and the eastern areas																												
Beckley																												
BEC0023 - Swan Meadows, Main Street		-	0	0	0	-	0	-	0	--	+	0	-	-	+	-	-	-	-	0	--	-	N/A	-	0	N/A	0	N/A
BEC0026 - Former Vineyard, Whitebread Lane		-	0	0	0	-	0	-	0	-	+	0	-	+	+	-	0	0	-	0	--	-	N/A	-	0	N/A	0	N/A
BEC0033 - Land north of Main Street		-	0	0	0	-	0	-	0	-	+	0	-	+	+	-	-	0	-	0	--	-	N/A	-	0	N/A	0	N/A
BEC0034 - Land and buildings, North of Main Street		-	0	0	0	0	0	-	0	-	+	0	-	+	+	-	-	0	-	0	--	-	N/A	--	0	N/A	0	N/A
BEC0035 - Land west of Hobbs Lane		-	0	-	0	--	0	-	0	+	+	0	-	+	+	-	0	0	-	0	--	-	N/A	--	0	N/A	0	N/A
BEC0036 - Land adjoining Thornberry Cottage, Main Street		-	0	0	0	0	0	-	0	--	+	0	-	+	+	-	0	0	-	0	--	-	N/A	--	0	N/A	0	N/A
BEC0038 – Land at Hobbs Lane		-	0	0	0	-	0	-	0	-	+	0	-	+	+	-	-	0	-	0	--	-	N/A		-	N/A	0	N/A
BEC0025 Land west of Royal Oak Close		-	0	0	0	0	0	-	0	+	+	0	-	+	+	-	0	0	-	0	--	-	N/A	--	0	N/A	0	N/A
Brede (Broad Oak)													+															
BRE0003 - Land south of the Broad Oak public house		0	0	0	0	0	0	0	0	+	0	0	0	+	+	0	0	0	-	0	--	0	N/A	--	0	N/A	0	N/A
BRE0029 - Land rear of The Old Manor, Udimore Road		0	0	0	0	0	0	0	0	+	0	0	0	+	+	0	-	0	-	0	--	-	N/A	--	0	N/A	0	N/A
BRE0046 - Land to the rear of Crown Cottage, Cackle Street		0	0	0	0	0	0	0	0	+	--	0	0	+	+	0	-	0	-	0	--	-	N/A	--	0	N/A	0	N/A
BRE0028 - The Coppice, Northiam Road, Broad Oak		0	0	0	-	0	0	0	0	+	--	0	0	+	+	0	0	0	0	0	--	0	N/A	-	0	N/A	0	N/A
BRE0030 - Birchwood, Northiam Road, Broad Oak		0	0	0	-	0	0	0	0	+	--	0	0	+	+	0	0	0	0	0	--	0	N/A	-	0	N/A	0	N/A
BRE0047 - The Barns, adj to Steeplands, Pottery Lane		-	0	0	0	0	0	-	0	+	+	0	--	-	+	-	0	0	-	0	--	-	N/A	-	0	N/A	0	N/A
Camber																												
CAM0011 - Dudley’s Field, Land to the south of Oliphant’s Barn, Jury’s Gap		--	--	0	0	--	0	--	--	+	--	0	--	-	+	--	0	0	+	0	0	NA	N/A	--	0	N/A	--	N/A
Icklesham (Winchelsea and Winchelsea Beach)																												
ICK0001 - Six Acres, Sea Road		0	-	0	0	0	0	0	--	+	--	0	--	+	+	0	0	0	-	0	-	NA	N/A	--	0	N/A	+	N/A
ICK0025 - Windmill Caravan Park, Willow Lane		0	-	0	0	-	0	0	--	+	--	0	--	+	+	0	0	0	-	0	-	NA	N/A	+	0	N/A	+	N/A
ICK0027 - Land between Morlais Ridge and The Ridge		0	--	0	0	--	0	0	--	--	-	0	--	+	+	0	0	0	-	0	-	NA	N/A	--	0	N/A	+	N/A
Iden																												
IDE0009 - Land on the north of Church Lane		-	0	-	0	-	0	-	0	+	+	0	0	+	+	-	-	-	-	0	--	--	N/A	--	0	N/A	0	N/A
IDE0020 - Land at Wycombe, Grove Lane		-	-	0	0	--	0	-	0	+	+	0	0	+	+	-	-	0	-	0	--	-	N/A	--	0	N/A	0	N/A
IDE0021 - Street Field (larger site), Main Street		-	-	0	0	0	0	-	0	+	+	0	0	+	+	-	-	-	-	0	--	--	N/A	--	0	N/A	0	N/A
Northiam																											0	

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
NOR0001 - Land east of B2088		+	0	-	0	-	0	+	0	+	--	0	++	+	+	+	0	-	-	0	--	-	N/A	--	0	N/A	0	N/A
NOR0002 - Ivy Lodge, Station Road		+	0	0	-	0	0	+	0	+	--	0	++	+	+	+	-	0	-	0	--	-	N/A	--	0	N/A	0	N/A
NOR0023 - Ballards, Station Road		+	-	0	0	-	0	+	0	+	--	0	++	+	+	+	0	0	-	0	--	-	N/A	--	0	N/A	0	N/A
NOR0024 - Land off Main Street, Hayes Farm		+	-	-	-	--	0	+	0	+	--	0	++	+	+	+	--	--	-	0	--	-	N/A	--	0	N/A	0	N/A
NOR0025a - Land at The Cedars (large), Station Road		+	0	0	0	0	0	+	0	+	--	0	++	+	+	+	-	0	-	0	--	-	N/A	--	0	N/A	0	N/A
NOR0025b - Land at The Cedars (medium), Station Road		+	0	0	0	0	0	+	0	+	+	0	++	+	+	+	-	0	-	0	--	-	N/A	--	0	N/A	0	N/A
NOR0025c - Land at The Cedars (small), Station Road		+	0	0	0	0	0	+	0	+	+	0	++	+	+	+	-	0	-	0	--	-	N/A	--	0	N/A	0	N/A
NOR0026 Land at Egmont Farm, Station Road		+	0	-	0	0	0	+	0	+	+	0	++	-	+	+	0	0	-	0	--	-	N/A	-	0	N/A	0	N/A
NOR0038 – Old Wheelwrights, Main Street		+	0	0	0	0	0	+	0	0	+	0	++	+	+	+	--	-	-	0	--	-	N/A	0	-	N/A	0	N/A
Peasmarsh																												
PEA0035 - Tanhouse Site B, east Tanhouse Lane		0	0	0	0	0	0	0	0	+	+	0	++	+	+	0	0	0	-	0	--	-	N/A	--	0	N/A	0	N/A
PEA0007 - Kings Head, Main Street		0	0	0	0	--	0	0	0	+	--	0	++	+	+	0	-	-	-	0	--	-	N/A	--	0	N/A	0	N/A
PEA0025 - Land at Tanhouse Lane		0	0	0	0	0	0	0	0	+	--	0	++	+	+	0	0	-	-	0	--	-	N/A	--	0	N/A	0	N/A
PEA0038 - Tanhouse Site B, west, Tanhouse Lane		0	0	0	0	0	0	0	0	+	--	0	++	+	+	0	0	-	-	0	--	--	N/A	--	0	N/A	0	N/A
PEA0039 - Pond Cottage, Tanhouse Lane		0	0	0	0	0	0	0	0	+	--	0	++	+	+	0	--	-	-	0	--	-	N/A	-	0	0	0	N/A
PEA0041 - Fortune Cottage, School Lane		0	0	0	--	0	0	0	0	+	+	0	++	+	+	0	0	0	-	0	--	-	N/A	-	0	N/A	0	N/A
PEA0040 - Land south of A268, New Cross Farm, Mill lane		0	0	0	0	0	0	0	0	+	--	0	++	+	+	0	-	-	-	0	--	-	N/A	--	0	N/A	0	N/A
PEA0034 - Land adjacent to Cornerways, School Lane		0	0	-	0	0	0	0	0	+	+	0	++	+	+	0	0	0	-	0	--	--	N/A	--	0	N/A	0	N/A
PEA0042 - Main Street, Peasmarsh (PEA0041)		0	0	0	-	-	0	0	0	+	+	0	++	+	+	0	0	0	-	0	--	-	N/A	--	0	N/A	0	N/A
Playden													++															
Land on the south of Playden Lane		+	0	0	0	0	0	+	0	0	0	0	+	-	+	+	-	0	-	0	0	N/A	0	0	0	N/A	+	N/A
Land at Playden Forge, Rye Road		+	0	0	0	0	0	+	0	0	0	0	+	-	+	+	-	-	-	0	0	N/A	0	0	0	N/A	+	N/A
Rye Foreign																												
Land southwest of Rye Hospital		+	0	0	0	0	+	+	0	+	+	0	+	-	+	+	0	-	-	0	--	-	N/A	0	0	N/A	+	N/A
RYF0012 – Land at the Post House, Rye Road		+	-	0	0	--	0	+	0	0	+	0	+	+	+	+	0	0	-	0	-	-	N/A	-	0	N/A	+	N/A
Rye																												
Land at Rye Marina		++	0	0	0	--	0	++	--	+	+	0	++	+	+	++	0	0	N/A	0	0	N/A	0	++	--	N/A	++	N/A
Land at Ferry Road and Cypress Place		++	-	0	0	0	0	++	0	0	0	0	++	-	+	++	-	-	N/A	0	0	N/A	0	++	0	N/A	++	N/A
RYE0039 - Land at Gatesborough Farm, Winchelsea Road		++	0	0	0	--	0	++0	--	+	+	0	++	-	+	++	-	0	--	0	--	-	N/A	--	0	N/A	++	N/A
RYE0042 - Land at Cadborough Farm		++	0	0	0	0	0	++	0	0	+	0	++	-	+	++	-	0	+	0	0	N/A	0	++	--	-	++	N/A
Land north-west of Udimore Road		++	0	0	0	0	0	++	0	+	+	0	++	-	+	++	0	0	-	0	0	N/A	-	--	0	N/A	++	N/A
RYE0047 - Rye Paddock, Harbour Road		0	0	0	0	0	0	++	--	+	+	0	++	-	+	++	0	0	0	0	0	N/A	0	0	0	N/A	++	N/A
RYE0038 - North Salts adjoining former Freda Gardham School		++	0	0	0	--	0	++	--	+	+	0	++	+	+	++	0	0	+	0	0	N/A	0	-	0	N/A	++	N/A

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
RYE0054 - Land south of Harbour Road		0	0	0	0	0	0	++	-	+	+	0	++	-	+	++	0	0	0	0	0	N/A	0	-	0	N/A	++	N/A
Udimore																												
UDI0002 - Land north of Vines Farm, Udimore Road		-	0	0	0	0	0	-	0	+	+	0	-	+	+	-	-	0	0	0	-	-	N/A	-	0	N/A	-	N/A
UDI0004 - Land at Udimore Road		-	-	0	0	0	0	-	0	+	+	0	-	-	+	-	0	0	-	0	-	-	N/A	-	0	N/A	-	N/A
UDI0005 - Land to the south of Udimore Road		-	-	0	0	0	0	-	0	0	0	0	-	+	+	-	0	0	-	0	-	-	N/A	-	0	N/A	-	N/A

Rye & Eastern Areas – economic

SA Objective	Indicative floorspace	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice		
			2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b	
Rye and the eastern areas																													
Iden																													
IDE0006 – Land at Orchard Farm, Main St		-	0	0	0	0	0	-	0	+	+	0	0	-	+	-	-	0	-	0	-	-	-	N/A	0	-	0	0	N/A

Northern Rother – residential

SA Objective	Indicative housing units	SA1: Air pollution					SA2: Biodiversity					SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b					
Northern Rother																																	
Burwash (and countryside locations)																																	
BUR0019 - Ashlands, High Street, Burwash		0	0	0	0	--	0	0	0	--	+	0	+	+	+	0	0	-	-	0	--	--	N/A	--	0	N/A	0	N/A					
BUR0024 - Little Dawes, A265, Burwash		0	0	-	0	-	0	0	0	--	+	0	+	+	+	0	0	0	-	0	--	--	N/A	-	0	N/A	0	N/A					

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
BUR0026 - Fields to the rear of 102-109 Shrub Lane, Burwash		0	0	--	0	--	0	0	0	--	+	0	+	+	+	0	-	0	-	0	--	--	N/A	--	0	N/A	0	N/A
BUR0036 - Broadview, Heathfield Rd, Burwash East Sussex, TN197HN		0	0	-	0	--	0	0	0	-	+	0	+	+	+	0	0	0	-	0	--	-	N/A	-	0	N/A	0	N/A
BUR0038 - Land adjacent to 83 Shrub Lane, Burwash		0	0	0	0	0	0	0	0	+	+	0	+	+	+	0	0	0	-	0	--	-	N/A	-	0	N/A	0	N/A
BUR0041 - Rear Plot of Glydwish Place, Frontage Lane		--	0	--	-	--	0	--	0	0	+	0	--	-	+	--	0	0	-	0	--	--	N/A	--	0	N/A	--	N/A
Burwash Common																												
BUR0017 - Linkway Field, Burwash Common		-	0	0	0	0	0	-	0	--	+	0	-	+	+	-	0	0	0	0	--	--	N/A	--	0	N/A	0	N/A
BUR0018 - Pooks Hill Farm, Land at junction of A265 and Foots Lane, Burwash Weald		-	0	0	0	-	0	-	0	--	+	0	-	-	+	-	0	0	0	0	--	-	N/A	--	0	N/A	0	N/A
BUR0020 - The Nutrition Centre (Higher Nature), Goodsoal Lane, Burwash Common		-	0	-	0	0	0	-	0	--	+	0	-	+	+	-	0	0	0	0	--	0	N/A	++	--	NA	0	N/A
BUR0021 - Land to the north of Luck Farm, Vicarage Road, Burwash Common		-	0	0	0	0	0	-	0	+	+	0	-	+	+	-	0	0	0	0	--	-	N/A	-	0	N/A	0	N/A
BUR0040 - Clover Leys Farmhouse		-	0	0	0	0	0	-	0	+	+	0	-	+	+	-	0	0	0	0	--	-	N/A	--	0	N/A	0	N/A
Etchingham																												
ETC0016 - Land at Church Lane, Etchingham		+	0	0	0	0	0	+	--	--	+	0	0	+	+	+	0	0	0	0	--	-	N/A	-	0	N/A	+	N/A
ETC0021 - Premises at Station Yard, High Street, Etchingham		+	0	0	0	-	0	+	--	--	+	0	0	+	+	+	0	0	0	0	--	0	N/A	++	--	N/A	+	N/A
Ewhurst (including Cripps Corner and wider parish)																												
EWH0001 - Goodwin Farm, Adams Lane, Ewhurst		--	0	-	0	0	0	--	0	--	+	0	--	-	+	--	-	0	-	0	--	--	N/A	-	-	N/A	--	N/A
EWH0011 - Land at Ockham Farm, Dagg Lane, Ewhurst Green		--	0	0	0	0	0	--	0	+	+	0	--	-	+	--	0	-	-	0	--	-	N/A	+	-	N/A	--	N/A
EWH0012 - Wattle Hill, Beacon Lane, Staplecross		-	0	0	0	0	0	-	0	--	+	0	--	-	+	--	--	-	-	0	--	-	N/A	-	0	N/A	--	N/A
EWH0017 - St Marks Church, Staplecross		0	0	0	0	0	0	0	0	+	+	0	0	+	+	0	0	0	-	0	--	0	N/A	0	0	N/A	0	N/A
EWH0019 - Beaconsfield House, Cripps Corner		-	0	0	0	-	0	-	0	-	+	0	--	-	+	-	-	-	-	0	--	-	N/A	--	0	N/A	0	N/A
EWH0020 - Land Adjacent Sideways, Northiam Road, Staplecross		0	0	0	0	0	0	0	0	+	+	0	0	+	+	0	-	0	-	0	--	-	N/A	--	0	N/A	0	N/A
Hurst Green																												
HUG0001 - and adjacent to Pentwood Place, London Road, Hurst Green		0	0	0	0	0	0	0	0	+	+	0	-	+	+	0	-	0	-	0	--	0	N/A	--	0	N/A	+	N/A
HUG0016 - Land at Cooks Field (northern parcel), Burgh Hill, Hurst Green		0	0	0	0	0	0	0	0	+	+	0	-	-	+	0	0	0	-	0	--	-	N/A	--	0	N/A	+	N/A
HUG0017 - Sweethayes Farm, London Road, Hurst Green		-	0	0	0	0	0	-	0	+	+	0	--	-	+	-	0	0	-	0	--	--	N/A	--	0	N/A	+	N/A
HUG0018 - Land adjacent to Iridge Place, London Road, Hurst Green		0	0	0	0	--	0	0	0	+	+	0	-	+	+	0	-	0	-	0	--	-	N/A	--	0	N/A	+	N/A
HUG0019 - Land at Cooks Field (southern parcel), Burgh Hill, Hurst Green		0	0	0	0	0	0	0	0	--	+	0	-	+	+	0	0	0	-	0	--	--	N/A	--	0	N/A	+	N/A

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
HUG0020 - Land adjacent to Mill Barn, Silver Hill, Hurst Green		-	0	0	0	0	0	-	0	+	+	0	--	-	+	-	-	0	-	0	--	-	N/A	--	0	N/A	+	N/A
HUG0036 – Land at Haydon Lodge, Silverhill		-	0	0	0	-	0	-	0	+	+	0	--	-	+	-	-	0	-	0	--	0	N/A	0	-	N/A	+	N/A
HUG0042 - Land north of Bexhurst Oast, Merriments Lane, Hurst Green		0	0	0	0	--	0	0	0	-	+	0	--	+	+	0	0	0	-	0	--	-	N/A	--	0	N/A	+	N/A
HUG0044 - Land on the East Side of London Road, Hurst Green, Etchingham		0	0	-	0	--	0	0	0	--	+	0	-	+	+	0	0	0	-	0	--	--	N/A	--	0	N/A	+	N/A
Salehurst & Robertsbridge (including wider parish)																												
SAL0012 - Land at Bishops Lane, Robertsbridge		+	0	0	0	0	0	+	--	--	+	0	+	+	+	+	0	0	-	0	--	-	N/A	-	0	N/A	+	N/A
SAL0021 - Land associated with Hackwoods Bungalow, Willards Hill, Robertsbridge		+	0	-	0	--	0	+	0	--	+	0	+	-	+	+	0	0	0	0	--	0	N/A	-	0	N/A	+	N/A
SAL0025 - Beech Farm (small site), Knelle Road, Robertsbridge		+	0	0	0	0	0	+	0	+	+	0	+	+	+	+	0	0	-	0	--	--	N/A	--	0	N/A	+	N/A
SAL0034 - Beech Farm (large site), Knelle Road, Robertsbridge		+	0	--	0	--	0	+	--	--	+	0	+	+	+	+	0	0	-	0	--	--	N/A	--	0	N/A	+	N/A
SAL0038 – Land Adjoining Station Road, Robertsbridge, TN32 5DG		+	0	0	0	0	0	+	--	--	+	0	+	+	+	+	-	0	0	0	--	+	N/A	0	-	N/A	+	N/A
SAL0039 - Boarsney Farm, Bodiam Road, Robertsbridge, TN32 5SR		--	0	0	0	0	0	--	0	--	+	0	--	-	-	--	-	0	-	0	--	0	N/A	--	-	N/A	--	N/A
SAL0040 - Land to the south of Redlands Lane, Salehurst		+	0	0	0	--	0	+	0	--	0	0	+	+	+	--	0	0	-	0	--	0	N/A	0	0	N/A	+	N/A
SAL0041 – The Grange, Bodiam, TN32 5UY		--	0	0	0	-	0	--	0	--	+	0	--	-	+	--	-	0	-	0	--	-	N/A	--	0	N/A	--	N/A
SAL0047 - Land North of Knelle Road comprising part of Beech Farm, Robertsbridge, TN19 7QE		+	0	-	0	--	0	+	--	--	+	0	+	+	+	+	-	0	-	0	--	--	N/A	--	0	N/A	+	N/A
Flimwell																												
TIC0002 - Land between Rosemary Lane and Broom Hill, Berners Hill, Flimwell		0	0	0	0	0	0	0	0	0	+	0	--	+	+	0	0	0	-	0	--	-	N/A	--	0	N/A	+	N/A
TIC0038 - Land adjacent Seacox Cocks, Hawkhurst Road, Flimwell		0	0	-	-	--	0	0	0	0	+	0	--	-	+	0	-	0	+	0	--	0	N/A	--	0	N/A	+	N/A
TIC0039 - Land West of Bewl Bridge Close		0	0	-	0	0	0	0	0	--	+	0	--	+	+	0	0	0	-	0	--	-	N/A	--	0	N/A	+	N/A
TIC0041 - Berners Hill Farm, Flimwell		0	0	0	0	0	0	0	0	+	+	0	--	+	+	0	-	0	-	0	--	-	N/A	-	-	N/A	+	N/A
TIC0046 - Villa Flair, Union Street, Flimwell		0	0	0	0	0	0	0	0	+	+	0	--	+	+	0	-	0	-	0	--	0	N/A	-	0	N/A	+	N/A
TIC0085 - Land rear of Mark Lilly Garage, Flimwell		0	0	-	0	0	0	0	0	-	+	0	--	-	+	0	0	0	+	0	--	-	N/A	-	0	N/A	+	N/A
TIC0086 - Church Farm, The Mount, Flimwell		--	0	-	0	-	--	0	0	0	+	0	--	-	+	0	-	0	-	0	--	-	N/A	-	0	N/A	--	N/A
TIC0088 – Land West of Bewl Bridge Close, extension site		0	0	0	0	0	0	0	0	0	+	0	--	+	+	0	0	0	-	0	--	-	N/A	--	0	N/A	+	N/A
Ticehurst																												
TIC0023 – Land off Lower Platts, Ticehurst		+	0	0	0	0	0	+	0	--	+	0	+	+	+	+	-	0	-	0	--	0	N/A	--	0	N/A	+	N/A
TIC0029 - Junction of London Road and A268 (North), Flimwell		0	0	-	0	0	0	0	0	0	+	0	--	+	+	0	0	0	+	0	--	-	N/A	--	0	N/A	+	N/A

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
TIC0040 - 40 and 41 High Street, and land to the rear, Ticehurst, East Sussex		+	0	0	0	-	0	+	0	0	+	0	+	+	+	+	-	-	-	0	--	-	N/A	-	0	N/A	+	N/A
TIC0042 - Land at Ridgeway Farm, Burnt Lodge Lane, Ticehurst		-	0	0	0	--	0	-	0	+	+	0	--	+	+	-	-	0	-	0	--	-	N/A	-	0	N/A	+	N/A
TIC0048 - Land at Tinkers Lane, Ticehurst		0	0	0	0	0	0	0	0	+	+	0	-	+	+	0	0	0	-	0	--	-	N/A	--	0	N/A	+	N/A
TIC0049 - Land north of Steellands Rise and Banky Field, Ticehurst		+	0	0	0	-	0	+	0	--	+	0	+	+	+	+	0	0	-	0	--	--	N/A	--	0	N/A	+	N/A
TIC0059 – Land north of Horsegrove Avenue, Ticehurst		+	0	0	0	0	0	+	0	0	+	0	+	+	+	+	0	0	-	0	--	-	N/A	--	0	N/A	+	N/A
TIC0083 – The Weald Smokery, Flimwell		0	0	-	0	0	0	0	0	--	+	0	--	+	+	0	0	0	+	0	--	0	N/A	+	--	0	+	N/A
TIC0096 – Field adjacent to Fine Acres Astricus, Tolhurst Lane, Ticehurst		--	0	0	0	0	0	--	0	--	+	0	--	-	+	--	0	0	-	0	--	-	N/A	--	0	N/A	--	N/A
TIC0098 - Land at Oakover, Church Street, Ticehurst		+	0	-	0	-	0	+	0	0	+	0	+	+	+	+	-	-	-	0	--	--	N/A	--	0	N/A	+	N/A

Northern Rother – economic

N/A

Gypsy, traveller and travelling showpeople sites

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
Excluded Gypsy and Traveller Sites																												
GYP0002 – Land north of Broom Hill, Flimwell		0	-	-	0	0	0	0	0	--	+	N/A	--	+	+	0	0	0	-	0	--	-	N/A	--	0	N/A	+	N/A
GYP0003 – The Hollies, The Mount, Flimwell		0	-	-	-	--	0	0	0	0	+	N/A	--	-	+	0	-	0	+	0	--	0	N/A	--	0	N/A	+	N/A

Appendix 7:

Representations on the Sustainability Appraisal reports

Representations on the Interim SA Report (2026)

Respondent	Support/Object	Summary of comments	Rother District Council response
Natural England	Support.	Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. We note that we previously provided comments on your Draft Rother Local consultation (our reference 359662) where we focused on the use of Natural England's 'Green Infrastructure Framework - Principles and Standards for England' (GIF) and briefly touched on other matters previously discussed with your authority. These comments remain valid (I have attached a copy for convenience) and the comments below, in relation to your latest consultations, will have a similar focus. The absence of comments on other matters within the Plan should not be taken as Natural England having no comments to make but that we have prioritised our advice. In particular, we have not commented on SA or HRA concerns (other than in relation to the Dungeness Complex, below), or any protected landscape concerns nor reviewed the allocations.	Noted.
Environment Agency	Support	Thank you for consulting us on the Interim Sustainability Appraisal (SA) Report of the Rother Local Plan. Our aim is to assist you prepare and implement a sound, robust, and effective plan that is reflective of national policy and your local evidence	Noted. Comments will be considered and addressed as work on the Local Plan progresses.

Respondent	Support/Object	Summary of comments	Rother District Council response
		base. We hope that this collaborative process leads to a plan that delivers sustainable development, contributes to a stronger economy, and safeguards the environment for future generations. Our standard expectations The Environment Agency supports sustainable development that protects and enhances the natural environment, particularly the water environment. We expect all new developments to incorporate robust environmental safeguards and demonstrate a clear commitment to improving ecological outcomes. Key expectations include: Surface Water Management: No surface water runoff should be discharged directly into watercourses. This is essential to prevent pollution, erosion, and habitat degradation. Sustainable Drainage Systems (SuDS) are the preferred mitigation measure for managing surface water runoff. These systems help to mimic natural drainage, reduce flood risk, improve water quality, and support biodiversity. Water Environment (Water Framework Directive) (England and Wales) Regulations 2017: Developments must not cause deterioration in waterbody status under these regulations. Waterbodies classified under these regulations will hereafter be referred to as WFD waterbodies. Where possible, developments should actively contribute to the enhancement of the water environment, such as through habitat creation or improved water quality. If relevant for the development, work should be undertaken to complete actions set out within the River Basin Management Plan (RBMP).	

Respondent	Support/Object	Summary of comments	Rother District Council response
		Buffer Strips: Buffer strips are vital for intercepting pollutants, reducing erosion, and providing wildlife corridors. These should be incorporated into site designs to protect water quality and support ecological networks. Foul Drainage: All new developments should aim to connect to the existing mains drainage network. The use of private sewage treatment works or New Appointments and Variations (NAVs) should be avoided. Engagement with Water Companies: The local council and developers must liaise with the relevant water companies throughout the planning and construction process. This ensures a clear understanding of existing drainage infrastructure and confirms that there is sufficient capacity at the local sewage treatment works to accommodate the proposed development. Culverting: Culverting of main river channels should not be permitted, as it disrupts the connectivity of river corridor habitats and poses a risk to biodiversity. De-culverting should be actively encouraged, provided it can be demonstrated that doing so will not increase flood risk elsewhere. This approach supports the restoration of natural river processes and enhances ecological resilience. By adhering to these principles, we can help safeguard the water environment and contribute to a more resilient and sustainable future. Duty to Co-operate Most natural resources extend across multiple Local Authority areas. We encourage the Council to make full use of the Duty to Co-operate when revising this draft local plan. Cross-boundary, collaborative working will	

Respondent	Support/Object	Summary of comments	Rother District Council response
		ensure that strategic priorities across local boundaries are properly co-ordinated. Please consider this when addressing climate change, flood risk, waste management, habitat and biodiversity enhancement, watercourse protection and improvement, water and waste resources. Biodiversity We support the suggested mitigation measures for the SA objective 2. Biodiversity is protected, conserved and enhanced (page 58). However, we think you could go further and seek for habitats to be improved rather than just protected. For example, by re-naturalising a river and providing a green buffer, rather than only providing a green buffer. Flood Risk We support the suggested mitigation measures for the SA objective 5. Manage and reduce the risk of flooding (fluvial, tidal and surface water), now and in the future, and increase resilience to the wider effects of climate change (page 58). Specifically we support a Level 2 Strategic Flood Risk Assessment being undertaken. Coastal Erosion We support the suggested mitigation measures for the SA objective 6. The risk of coastal erosion is managed and reduced, now and in the future. Reference should also be made to the Shoreline Management Plan (SMP) (Rother is covered by the South Foreland to Beachy Head SMP11). This SMP identifies the most sustainable approach for managing the risk from coastal flooding and erosion over the short (0 to 20 years), medium (20 to 50 years) and long (50 to 100) term.	

Respondent	Support/Object	Summary of comments	Rother District Council response
		Ground Contamination We support the suggested mitigation measures for the SA objective 12. The risk of pollution to land and soils is reduced and quality is improved. We are specifically pleased to see “Set policies to ensure investigations are undertaken on contaminated land, and remediation measures undertaken where necessary”. Water quality and water resources The SA requires strengthening to ensure full compliance with the Water Framework Directive (WFD) and national policy. The SA should be expanded to include mapped water-related constraints and evaluate growth options against WFD, groundwater, and wastewater capacity risks, ensuring the Local Plan directs development to locations where the water environment can be adequately protected and enhanced. There is currently no mention of WFD anywhere in the document. We support the suggested mitigation measured for the SA objective 14. The risk of pollution to water is reduced and water quality is improved. We believe you can strengthen this by adding in that there should be policies to encourage the upgrading/improvement of drainage systems on existing sites. Surface water should not be connected to older combined drainage systems wherever possible, to reduce combined sewer overflows that result in a mix of rainwater and raw sewage discharging into rivers or the sea. The Local Plan should set strong targets for greenfield runoff rates, ensuring that post-development runoff does not exceed pre-development levels. The use of SuDS will be important in achieving this, helping to manage surface water, improve water quality, and enhance biodiversity.	

Respondent	Support/Object	Summary of comments	Rother District Council response
Historic England	Support	Historic England is a statutory consultation body in relation to the SEA Directive in regard to any matters affecting the historic environment. We are content that the Interim Sustainability Appraisal for Rother Draft Local Plan adequately covers the issues that may arise in respect of the potential effects of proposed development sites on heritage assets. This opinion is based on the information provided by you and for the avoidance of doubt does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the plan which is the subject to consultation, and which may, despite the SA, have adverse effects on the historic environment.	Noted.
Wealden District Council	Object	WDC welcomes the publication of the Council's new and updated evidence base, together with the supporting topic papers accompanying this consultation. RDC acknowledges that further detailed work and testing is required to clearly and robustly justify the proposed distribution of growth and to demonstrate that all reasonable opportunities to meet identified needs have been fully explored, in the lead up to its Regulation 19 version of the Rother Local Plan. With regards to the SA, it appears that both identified and proposed allocation sites have been assessed under each of the sub-areas in the main report, and that other HELAA sites that have been assessed, but rejected, are included in the appendices. The HELAA appears to be the main basis for selecting or rejecting sites, without a more detailed SA assessment of the sites sustainability to influence those outcomes. For instance, the SA does not provide a summary of the issues for the rejected sites. In addition, several of the sites which have been rejected for development have similar sustainability credentials and outcomes within the SA as to those sites	The Council considers that the SA/SEA has been prepared in line with the relevant legislative and policy requirements.

Respondent	Support/Object	Summary of comments	Rother District Council response
		that have been selected for proposed allocation. A greater understanding and explanation of how the SA process has been used to influence the outcome of the suitability of sites particularly important, especially in relation to rejected larger strategic sites that have been promoted by landowners and appear as available for development. WDC therefore considers that additional work is necessary to establish an evidence-led spatial strategy that is logical, consistent, and capable of withstanding scrutiny. Strengthening the evidence base in this way is essential to ensure the Draft Local Plan can demonstrate it has fully assessed development capacity across the district and has adopted the most appropriate spatial distribution in line with the NPPF (Dec 2024) under paragraph 36.	
Individual	Object	Don't understand what is being discussed. Where is link to the sustainability appraisal.	The Consultation Webpage provided a link to the Council's Supporting Evidence Base webpage and made clear that the Sustainability Appraisal was available there.
Individual	Support	A 20mph speed limit in the newly developed areas seems a good idea.	Noted.
Brede Parish Council	Support	Fully support.	Noted.
Hurst Green Parish Council	Object	HGPC has reviewed the Interim Sustainability Appraisal (SA) produced in support of the Regulation 18 consultation and has serious concerns about its robustness, independence, and internal consistency, particularly in respect of the Hurst Green site assessments.	The Council considers that the SA/SEA has been prepared in line with the relevant legislative and policy requirements.

Respondent	Support/Object	Summary of comments	Rother District Council response
		Concerns Regarding Independence and Professional Standards A Sustainability Appraisal is a statutory requirement of plan-making under the Planning and Compulsory Purchase Act 2004 and the Environmental Assessment of Plans and Programmes Regulations 2004. It is intended to provide an objective and independent assessment of the social, economic, and environmental implications of the plan's proposals. The Interim SA as published does not clearly identify the qualifications or professional credentials of those who produced it. For a statutory document of this significance, the certifications and professional standing of the authors should be stated explicitly. Their absence makes it impossible for consultees to assess the objectivity and competence of the assessment. HGPC is concerned that the SA may not have been produced with sufficient independence from the plan-making team. Where a Sustainability Appraisal is produced in-house, or without clearly independent professional oversight, its conclusions carry less weight and are more susceptible to challenge. The Council should confirm the basis on which the SA was produced and by whom. Conflicting and Inconsistent Scoring for Hurst Green Sites HGPC has identified what appears to be inconsistent and conflicting scoring in the SA in relation to the sites proposed for allocation in Hurst Green. In particular: Sites that share substantially the same locational characteristics - the same A21 frontage, the same distance from services, the same National Landscape constraints - appear to have been assessed differently without explanation; The scoring for transport	

Respondent	Support/Object	Summary of comments	Rother District Council response
		accessibility and sustainability criteria does not appear to reflect the documented evidence of over 90% car dependency and the absence of safe walking and cycling routes confirmed by the Council's own commissioned AECOM assessment; The assessment of landscape sensitivity does not appear consistent with the conclusions of the AECOM Strategic Environmental Assessment (February 2023), which validated community concerns about the unsuitability of the HG4 site for development. These inconsistencies are material. Where a Sustainability Appraisal produces results that conflict with the evidence base that the plan-making authority has itself commissioned, that conflict must be explained and resolved. It cannot simply be ignored in the allocation process. Subjectivity of Assessment HGPC is further concerned that elements of the SA appear to reflect subjective judgements that are not grounded in objective evidence. A robust SA should set out clearly the criteria applied, the evidence relied upon, and the reasoning by which scores have been assigned. Where the SA lacks this transparency, its conclusions cannot be relied upon as a sound basis for plan-making decisions. Conclusion on Question 68 HGPC requests that the Council commissions a fully independent review of the Sustainability Appraisal before the Regulation 19 stage, with particular attention to: the credentials and independence of those	

Respondent	Support/Object	Summary of comments	Rother District Council response
		producing the assessment; the consistency of scoring across comparable sites; and the reconciliation of SA conclusions with the wider evidence base, including the AECOM SEA. A flawed SA is a material risk to the soundness of the Local Plan at Examination.	
Peasmarsh Parish Council	Object	The sustainability appraisal for Peasmarsh puts a burden on Jempsons now and in the future to provide “essential services”, this does not seem sustainable in the long-term. Especially if [name redacted] retires and the business does not continue. The many photos included in the Appendix for the PNDP show that flooding is a local issue unlike the statement in 5.137 which says “On flooding, the parish scores both neutral and minor positives, indicating clearly that this is not a local issue”. Rother District Council is aware of the issues as [name redacted] (Rother District Council’s Housing and Homelessness Partnerships Manager) sought to have a meeting with the PC in January 2026 (he later cancelled) to discuss these concerns. Finally, in the ‘suggested mitigation measures’ under 5.138, it states that RDC would ‘Seek opportunities to make opportunities to make provision for shops or services in the parish area’. If Jempsons encapsulates all these essential services then why would they need to do this? Also, Jempsons would not welcome the competition of additional shops.	The methodology used for assessing site proposals, including for flood risk, was set out in the SA Report. Further flood risk assessment has been carried out to support the Regulation 19 version of the Local Plan. The SA is one of many considerations used to inform Local Plan provisions for future development in Peasmarsh and the appropriate mix of uses and within it.
Individual	Object	The Interim Sustainability Appraisal, Item 5.137, Page 120 says, [o]n flooding, the parish scores both neutral and minor positives, indicating clearly that this is not a local issue. This one sentence, more than any other, sums up how little real research has been done by Rother District Council. It betrays the planning	The methodology used for assessing site proposals, including for flood risk, was set out in the SA Report. Further flood risk assessment has been carried out to support the

Respondent	Support/Object	Summary of comments	Rother District Council response
		department's fundamental lack of understanding of the communities within its remit. It demonstrates that the assessments and assertions made in the plan were conjured up entirely from behind a desk. To support Rother District Council's vision, one needs to have confidence that it knows what it is doing. By any objective measure, whether it is public transport, flooding, sewage, power, education or just mundane human sensibilities, almost everything in this plan shows the council to be woefully out of touch with the people of Peasmarsh.	Regulation 19 version of the Local Plan.
Boyer Planning Ltd obo Wates Development	Object	At this stage, the SA (which Wates recognises as 'interim') does not yet offer a sufficiently strong justification for the scale of housing proposed in the Draft Local Plan, which (as discussed in our response to previous questions) results in a shortfall of 7,077 dwellings. A concern is that the various options presented do not test a reasonable alternative scenario where significantly higher levels of housing growth are achieved, other than through a strategy of densification (e.g., density scenarios Options B and C). It is also notable that even the high-density scenario (Option C), which is ruled out as unsuitable, would not fully meet the LHN. The current presentation of the SA also makes it somewhat difficult to understand how its evaluation informed the preferred strategy outlined in the draft Plan. It seems that the preferred approach is a combination of SDO1, SDO2, SDO3A, SDO4, SDO5, SDO6, SDO11, and SDO13. Wates suggests there is room for clarification, noting that the preeminent question at a future Examination will be whether the Plan has gone as far	The Council considers that the SA has identified and assessed reasonable alternatives for the Development Strategy, and other associated elements of the plan, in line with the relevant legislative and policy requirements. As explained in the SA Report and the Draft Local Plan (2026), the Council has sought to maximise the delivery of housing in the context of the district's development constraints, also having regard to the suitability, availability, and achievability of land as set out in the Housing and Economic Land Availability Assessment.

Respondent	Support/Object	Summary of comments	Rother District Council response
		as possible to sustainably meet housing needs. The Interim SA has not yet provided a clear answer to this. Wates recognises the need to balance the objectives outlined in NPPF paragraphs 11(b), 23, 61, and 62 with those that require the protection of National Landscapes (paragraph 189) and other environmental designations. However, the Government's recent intervention in Three Rivers indicates that a significant shortfall in meeting objectively assessed housing needs could pose a risk to the Plan when it is examined. The SA should consider reasonable alternatives, including additional allocations, to address a larger portion of the LHN. The Interim SA for BT2 is high-level and incomplete, with many "neutral/unknown" scores due to its policy-off approach. The SA has not yet applied mitigation that will form part of BT2, such as outcomes from ongoing hydro-ecological monitoring, which is expected to improve biodiversity scoring. Because BT2 depends on linked development within Hastings, larger-scale growth will also enhance connectivity and sustainable travel performance. As the SA is refined, a combined assessment covering the entire Breadsell Growth Area across both authorities would be more meaningful and assist Inspectors at Examination.	The methodology employed for assessing sites, and the reasons for this, are set out in the SA report. The Council considers the approach to SA of sites is proportionate to this stage of the plan process, acknowledging that further detailed assessments may be carried out through the development management process, where necessary and appropriate. The SA appraisal of sites is one of many considerations the Council considers for the suitability of sites to be allocated in the draft Local Plan.
Individual	Object	The Sustainability Appraisal appears to underestimate key issues, particularly flooding. This raises concerns about the accuracy of the evidence base and whether local conditions have been properly understood (fluvial vs pluvial flooding)	The methodology used for assessing site proposals, including for flood risk, was set out in the SA Report. Further flood risk assessment has been carried out to support the

Respondent	Support/Object	Summary of comments	Rother District Council response
			Regulation 19 version of the Local Plan.
Bidwells obo Exeter College	Support	We support the findings of the Interim Sustainability Appraisal (January 2026), specifically the preferred spatial development strategy. We strongly endorse the Council's decision to pursue options which support development coming forward at Robertsbridge, such as SDO4 (Sustainable settlement extensions) and SDO11 (Growth in settlements with railway stations or sustainable transport alternatives). Robertsbridge is a highly sustainable location, and Land at Grove Farm (Phase 2) is a logical extension that sits within easy walking distance of essential village services and the mainline railway station. This approach aligns with the Local Plan's "Live Well Locally" priority by directing growth to areas where sustainable transport links and accessibility to social opportunities are already established.	Noted.
DHA obo Rurban Estates Limited	Object	The Interim Sustainability Appraisal (SA) provides an assessment of the proposed options for growth, including the sites identified for allocation. The SA scores the proposed allocations against the objectives of the emerging Local Plan, with reference to SA indicators for more specific assessment under each objective. We make the following general observations on the assessment methodology, where it relates to matters that can be addressed through detailed design. We urge the Council to consider revising the assessment methodology to ensure that suitable sites are not prematurely discounted given the considerable need for housing in the district. • 2b scores any site adjacent to Ancient Woodland as having a 'minor negative' effect. This disproportionately affects the assessment of sites that can suitably	The methodology employed for assessing sites, and the reasons for this, are set out in the SA report. The Council considers the approach to SA of sites is proportionate to this stage of the plan process, acknowledging that further detailed assessments may be carried out through the development management process, where necessary and appropriate. The HELAA has been used to assess

Respondent	Support/Object	Summary of comments	Rother District Council response
		accommodate the required ancient woodland buffer within a development proposal. Similar comments can be made on 2d which refers to priority habitat. • 5b scores any site with land at high risk of surface water flooding as having a 'significant adverse' effect. As above, it is possible design around, and in many cases improve, this risk through technical drainage design. • 7b scores any site not within 400m of a public open space of any type as a 'minor negative'. This unnecessarily affects the assessment of sites that look to suitably accommodate public open space needs within their scheme. • 15a gives a 'significant adverse effect' to any development in the National Landscape, however it is clear that the level of effects will vary depending on the characteristics of the site. We request that the 'minor negative' scoring is also given to sites in the National Landscape that could be sensitively developed. Site assessment table provided as part of representation.	the availability, suitability and achievability of sites in the first instance. The SA appraisal of sites is one of many considerations the Council considers for the suitability of sites to be allocated in the draft Local Plan.
DHA obo Catesby Strategic Land Ltd and Rurban Estates Limited	Object	The Interim Sustainability Appraisal (SA) provides an assessment of the proposed options for growth, including the sites identified for allocation. The SA scores the proposed allocations against the objectives of the emerging Local Plan, with reference to SA indicators for more specific assessment under each objective. We make the following general observations on the assessment methodology, where it relates to matters that can be addressed through detailed design. We urge the council to consider revising the assessment methodology to ensure that suitable sites are not prematurely discounted given the considerable need for housing in the district. 2b scores any site within Ancient Woodland as having a 'significant adverse' effect. This disproportionately affects the assessment of sites that can suitably	The methodology employed for assessing sites, and the reasons for this, are set out in the SA report. The Council considers the approach to SA of sites is proportionate to this stage of the plan process, acknowledging that further detailed assessments may be carried out through the development management process, where necessary and appropriate. The HELAA has been used to assess

Respondent	Support/Object	Summary of comments	Rother District Council response
		accommodate the required ancient woodland buffer within a development proposal. Similar comments can be made on 2d which refers to priority habitat. 2c scores any site with a TPO as 'minor negative'. The development of a site can avoid any impacts on trees with a TPO. 5b scores any site with land at high risk of surface water flooding as having a 'significant adverse' effect. As above, it is possible design around, and in many cases improve, this risk through technical drainage design. Similar comments can be made on 5c which refers to ground water risk. 15a gives a 'significant adverse effect' to any development in the National Landscape, however it is clear that the level of effects will vary depending on the characteristics of the site. We request that the 'minor negative' scoring is also given to sites in the National Landscape that could be sensitively developed. The table below provides our assessment of Site WS2 with reference to the sustainability indicators and assessment criteria.	the availability, suitability and achievability of sites in the first instance. The SA appraisal of sites is one of many considerations the Council considers for the suitability of sites to be allocated in the draft Local Plan.
Homes England	Support/Object	We support the preparation and use of the Interim Sustainability Appraisal (January 2026). In confirming the appropriacy of the proposed strategy, Sustainability Appraisals, as required by the Strategic Environmental Assessment Regulations (The Environmental Assessment of Plans and Programmes Regulations 2004), ensure the potential environmental effects are given full consideration alongside social and economic issues, and so the strategy can be considered sustainable per the objectives set out in paragraph 8 of the NPPF. The Interim Sustainability Appraisal recognises the confirmed sustainability and suitability for development of Land at Northeys, as	The SA appraisal of sites is one of many considerations the Council considers for the suitability of sites to be allocated in the draft Local Plan.

Respondent	Support/Object	Summary of comments	Rother District Council response
		indicated by its existing allocation (DaSA Policy BEX10), and provides the justification for increasing the capacity of the site from 140 dwellings. However, it is noted that whilst the HELAA (Part 2 Site Assessments) considers the three parcels of draft policy BX28 (BEX0007, BEX0103, BEX0119) individually, the Interim Sustainability Appraisal assesses all three sites together. In doing so, it is not possible to assess the differing characteristics and standalone merits of each parcel (as outlined in the HELAA) against the SA objectives. Instead, by not considering the sites individually in the Interim Sustainability Appraisal, the proposed allocation of these parcels under Policy BX28 appears to be a result of their similar location and shared boundaries, rather than following the conclusion that this would be justified, deliverable, that there are benefits of doing this, or this was the most sustainable option. By collectively assessing the three parcels within the draft allocation against the SA objectives, it cannot be concluded that the approach of combining the sites into one allocation is the most appropriate format for their allocation (one allocation, rather than separate allocations for each parcel). It could be that the Site Assessment score of BX28 is worse than that for the individual parcels if assessed separately, due to their limited interrelationship and likely independent delivery, and so it would be more appropriate to have individual allocations for each parcel. We believe the Sustainability Appraisal should be updated to re-assess the sites on an individual basis, to ensure the Plan is based on a sound	

Respondent	Support/Object	Summary of comments	Rother District Council response
		evidence base, per NPPF paragraph 36, promoting the effectiveness of the Plan. Furthermore, as set out in our previous Call for Sites submission, it is considered that were the Land at Northeye to be assessed individually, it would score positively and further confirm within the evidence the suitability of the site as a draft allocation that can achieve independent early delivery of homes.	
Homes England	Support	The Interim Sustainability Appraisal Report (January 2026) suggests that the appraisal found there to be a mix of likely positive, neutral and negative effects of the sites in Salehurst and Robertsbridge. The negative effects identified relate to biodiversity, landscape sensitivity, flood risk, heritage assets and access to services. As previously mentioned, the Call for Sites (September 2025) representations provided further details on the sites in relation to the proposed approach to landscape, flooding, heritage and the sustainability of the site regarding access to services. These representations provided some recommended amendments to the HELAA sustainability appraisal ratings and Homes England are pleased to see that Robertsbridge is now considered a 'good sustainability' settlement within the Draft Local Plan. The emerging Masterplan for the site has taken into account all of the site's social, environmental and heritage constraints to ensure that the design is sensitive to the surrounding context. All of the suggested mitigation measures at paragraph 5.166 of the Sustainability Appraisal (January 2026) have been incorporated into the Masterplan and/ or appropriate assessments undertaken, to be submitted as part of the hybrid planning application to demonstrate that there are no negative	The methodology employed for assessing sites, and the reasons for this, are set out in the SA report. The Council considers the approach to SA of sites is proportionate to this stage of the plan process, acknowledging that further detailed assessments may be carried out through the development management process, where necessary and appropriate.

Respondent	Support/Object	Summary of comments	Rother District Council response
		effects arising from the proposed development. Any future updates to the Sustainability Appraisal should incorporate this additional evidence.	
Tunbridge Wells Borough Council	Support	The SA should clarify whether the development around Bexhill will work towards or set the framework for the sustainable transport corridor coming forward in the future, or at least not hinder its potential.	This is a matter for the Local Plan to address, with the assessment of this approach provided by the SA. Options for the Development Strategy involving the A21 Corridor have been explored through the SA process.
Catesby Estates	Object	The Interim Sustainability Appraisal provides an assessment of the proposed options for growth, including the sites identified for allocation. The SA scores for the proposed allocations against the objectives of the emerging Local Plan, with reference to the SA indicators for more specific assessment under each objective. We make the following general observations under the assessment methodology, where it relates to matters than be addressed through detailed design. We urge the Council to consider reviewing the assessment methodology to ensure that suitable sites are not prematurely discounted given the considerable need for housing in the district. Table provided of representor's comments own assessment of the site criteria.	The methodology employed for assessing sites, and the reasons for this, are set out in the SA report. The Council considers the approach to SA of sites is proportionate to this stage of the plan process, acknowledging that further detailed assessments may be carried out through the development management process, where necessary and appropriate. The HELAA has been used to assess the availability, suitability and achievability of sites in the first instance. The SA appraisal of sites is one of many

Respondent	Support/Object	Summary of comments	Rother District Council response
			considerations the Council considers for the suitability of sites to be allocated in the draft Local Plan.
DHA obo Denbigh Properties Ltd	Object	The Interim Sustainability Appraisal (SA) provides an assessment of the proposed options for growth, including the sites identified for allocation. The SA scores the proposed allocations against the objectives of the emerging Local Plan, with reference to SA indicators for more specific assessment under each objective. It is noted that the SA does not confirm what each indicator refers to (for example, how it relates to the assessment questions outlined in the appendix), therefore it is not possible to provide detailed comments on the assessment's assessments. We request that the final SA is updated to address this. It is noted however that there are some inconsistencies with how FW1 has been assessed compared to other identified sites in Flimwell. For example, FW1 received a significant negative in relation to flood risk and two significant negatives for biodiversity. The reasons for this are highly unclear on the evidence that the site is unaffected by flood risk from any source and has been demonstrated through the submission of previous ecology evidence to generally be of poor ecological quality, consisting of improved grassland and bramble scrub. In terms of arboriculture, the majority of trees and hedgerows within the site perimeter can be retained. A significant buffer to the north	The methodology for assessing the sites is set out in the Interim SA Report, including Appendix 3 – this is clearly organised around the objectives and questions in the SA Framework. The SA Report also discusses at length the reasons for the 'bespoke methodology' for appraising sites, and how this has informed the plan process. Appendix 3 makes clear how scoring of sites has been undertaken under each of the relevant criteria. Additional flood risk assessment will be undertaken to inform the Regulation 19 version of the plan.

Respondent	Support/Object	Summary of comments	Rother District Council response
		of the site will also protect trees within Wardsdown Wood (Ancient Woodland).	
DHA obo Rurban Estates	Object	The Interim Sustainability Appraisal (SA) provides an assessment of the proposed options for growth, including the sites identified for allocation. The SA scores the proposed allocations against the objectives of the emerging Local Plan, with reference to SA indicators for more specific assessment under each objective We make the following general observations on the assessment methodology, where it relates to matters that can be addressed through detailed design. We urge the council to consider revising the assessment methodology to ensure that suitable sites are not prematurely discounted given the considerable need for housing in the district: 2b scores any site within Ancient Woodland as having a 'significant adverse' effect. This disproportionately affects the assessment of sites that can suitably accommodate the required ancient woodland buffer within a development proposal. Similar comments can be made on 2d which refers to priority habitat. 2c scores any site with a TPO as 'minor negative'. The development of a site can avoid any impacts on trees with a TPO. 5b scores any site with land at high risk of surface water flooding as having a 'significant adverse' effect. As above, it is possible design around, and in many cases improve, this risk through technical drainage design. Similar comments can be made on 5c which refers to ground water risk. The table below provides our assessment of Site Reference SAL0025 and SAL0047 with reference to the sustainability indicators and assessment criteria. It is noted that Robertsbridge Site Allocation RB6(a) scores the same against all indicators other than landscape sensitivity in the	The methodology employed for assessing sites, and the reasons for this, are set out in the SA report. The Council considers the approach to SA of sites is proportionate to this stage of the plan process, acknowledging that further detailed assessments may be carried out through the development management process, where necessary and appropriate. The HELAA has been used to assess the availability, suitability and achievability of sites in the first instance. The SA appraisal of sites is one of many considerations the Council considers for the suitability of sites to be allocated in the draft Local Plan.

Respondent	Support/Object	Summary of comments	Rother District Council response
		National Landscape, where impacts are identified as ‘medium’ rather than ‘high’. Against several indicators, Site Reference SAL0025 and SAL0047 score more favourably than Site Allocation RBb(a), namely: Heritage – there is a Grade II listed building in the site; Priority Habitat – the site lies in an Archaeological Notification Area; Flood Risk – a portion of the site is in Flood Zone 2 and 3, with areas of surface water flood risk. Representor includes a table. While these scores would not preclude the development of Site Allocation RB6(a), it is clear that Site Reference SAL0025 and SAL0047 score comparably to allocated sites within Robertsbridge. The site also scores similarly to Robertsbridge Site Allocation RB1, RB3, RB4 with the most notable difference being landscape sensitivity. The landscape evidence submitted with this representation demonstrates that landscape sensitivity would not be ‘high’ as assessed in the SA.	
Wild About Burwash	Object	It is assumed that the question is meant to relate to the Sustainability Appraisal in the Interim consultation document of January 2026. The group is unaware of any Interim Sustainability Appraisal. In the document there is feedback on sustainability appraisal and habitat regulations. Surprisingly, the document does not list any feedback it only puts in one sentence details about the sections the planners have put the comments in. There is also one other sentence in the section that deals with the summary of the next steps.	The Consultation Webpage provided a link to the Council’s Supporting Evidence Base webpage and made clear that the Sustainability Appraisal was available there.
Individual	Object	Objection to the Sustainability Assessment (“SA”) for the following reasons:	An assessment of the cumulative impacts of the site

Respondent	Support/Object	Summary of comments	Rother District Council response
		No SA of the cumulative impact of proposed allocations to settlements. SA assumes the Local Plan strategy is a “<i>cluster</i>” of villages contributing to a development total around Battle. This is the theoretical intention not the actual strategy: a “<i>cluster</i>” of villages around Battle is not actively contributing towards the development total. The strategy is intensive damaging change to one village. In relation to Landscape Impact SA Category 15C (Appendix 6), the High Weald National Landscape (AONB) Management Plan is also a database document for land outside the HWNL but within the setting of the HWNL. Landscape Impact SA Category 15C for Catsfield CT3 The Brooks should show RED not ORANGE. No evidence base justifies ORANGE “Minor Negative”: the Settlement Study justifies RED “Significant Negative” (Appendix 6). Landscape Impact SA category 15C states landscape impact of proposed allocations will be assessed against the Settlement Study for land outside the HWNL. The Settlement Study for Catsfield CT3 The Brooks is CAT2 - Flats Wood (Appendix 2) and requires RED “Significant Negative”.	allocations has been carried out through the assessment of the Development Strategy, which the site allocations help give effect to. The Council will review the SA assessment to ensure it appropriately reflects the Settlement Study and the methodology set out in Appendix 3 of the Interim SA Report (2026).
DHA obo Catesby Strategic Land Ltd and Rurban Estates Ltd	Object	The Interim Sustainability Appraisal (SA) provides an assessment of the proposed options for growth, including the sites identified for allocation. The SA scores the proposed allocations against the objectives of the emerging Local Plan, with reference to SA indicators for more specific assessment under each objective.	The methodology employed for assessing sites, and the reasons for this, are set out in the SA report. The Council considers the approach to SA of sites is proportionate to this stage of the plan process, acknowledging

Respondent	Support/Object	Summary of comments	Rother District Council response
		We make the following general observations on the assessment methodology, where it relates to matters that can be addressed through detailed design. We urge the council to consider revising the assessment methodology to ensure that suitable sites are not prematurely discounted given the considerable need for housing in the district. 2b scores any site within Ancient Woodland as having a 'significant adverse' effect. This disproportionately affects the assessment of sites that can suitably accommodate the required ancient woodland buffer within a development proposal. Similar comments can be made on 2d which refers to priority habitat. 2c scores any site with a TPO as 'minor negative'. The development of a site can avoid any impacts on trees with a TPO. 5b scores any site with land at high risk of surface water flooding as having a 'significant adverse' effect. As above, it is possible design around, and in many cases improve, this risk through technical drainage design. Similar comments can be made on 5c which refers to ground water risk. The table below provides our assessment of Site BX36 with reference to the sustainability indicators and assessment criteria. (Table provided).	that further detailed assessments may be carried out through the development management process, where necessary and appropriate. The HELAA has been used to assess the availability, suitability and achievability of sites in the first instance. The SA appraisal of sites is one of many considerations the Council considers for the suitability of sites to be allocated in the draft Local Plan.
DHA obo Catesby Strategic Land Ltd and Rurban Estates Ltd	Object	The Interim Sustainability Appraisal (SA) provides an assessment of the proposed options for growth, including the sites identified for allocation. The SA scores the proposed allocations against the objectives of the emerging Local Plan, with reference to SA indicators for more specific assessment under each objective. We make the following general observations on the assessment methodology, where it relates to matters that can be addressed through detailed design. We urge the council to consider revising the assessment	The methodology employed for assessing sites, and the reasons for this, are set out in the SA report. The Council considers the approach to SA of sites is proportionate to this stage of the plan process, acknowledging that further detailed

Respondent	Support/Object	Summary of comments	Rother District Council response
		methodology to ensure that suitable sites are not prematurely discounted given the considerable need for housing in the district. 2b scores any site within Ancient Woodland as having a 'significant adverse' effect. This disproportionately affects the assessment of sites that can suitably accommodate the required ancient woodland buffer within a development proposal. Similar comments can be made on 2d which refers to priority habitat. 2c scores any site with a TPO as 'minor negative'. The development of a site can avoid any impacts on trees with a TPO. 5b scores any site with land at high risk of surface water flooding as having a 'significant adverse' effect. As above, it is possible design around, and in many cases improve, this risk through technical drainage design. Similar comments can be made on 5c which refers to ground water risk. The table below provides our assessment of Site BX39 with reference to the sustainability indicators and assessment criteria. (Table provided).	assessments may be carried out through the development management process, where necessary and appropriate. The HELAA has been used to assess the availability, suitability and achievability of sites in the first instance. The SA appraisal of sites is one of many considerations the Council considers for the suitability of sites to be allocated in the draft Local Plan.
Landstrom Group	Object	The latest HELAA is factually incorrect in its description. The site was not refused by the Council for reasons relating to biodiversity, insufficient affordable housing, or for reason of being outside the development boundary. (refer to attached appendix 2 for the decision notice). It is implied that the refusal reasons were 'upheld', but it is clear that the appeal failed for unrelated technical reasons relating to the location of affordable housing on-site vs off-site or via commuted sum (see appendix 3). The HELAA therefore fails to acknowledge that the planning and appeal process instead established some important positive principles for the suitability of this site for development.	The methodology employed for assessing sites, and the reasons for this, are set out in the SA report. The Council considers the approach to SA of sites is proportionate to this stage of the plan process, acknowledging that further detailed assessments may be carried out through the development management process, where

Respondent	Support/Object	Summary of comments	Rother District Council response
		In turn, it appears as though the Interim Sustainability Appraisal carried forward this mistaken HELAA summary and has failed to include HUG0016 as a suitable site for allocation within the Northern Rother sub-area. For the reasons described above in relation to our response to question 63, we believe that there have been demonstrable, fundamental mistakes made in the assessment of HELAA sites HUG0016 and HUG0019. We therefore believe that the Sustainability Appraisal could be considered unsound in its current form.	necessary and appropriate. The HELAA has been used to assess the availability, suitability and achievability of sites in the first instance. The SA appraisal of sites is one of many considerations the Council considers for the suitability of sites to be allocated in the draft Local Plan.
Individual		Summary Overall, not a great slew of new nature legislation, but too much reliance on BNG sorting everything out and ticking the box for 'conserve and enhance' which goes back decades. There are more of the same paragraphs on nature conservation to look after town and country, protected areas, especially in proximity to UK and EU sites, confusing advice on buffers around Ancient Woodland (upped to 50m), new enthusiasm for corridors, continued promotion of BNG but retreating from higher than national mandatory levels, so overall a continuation of what was already described in Rother and plenty of leeway for negotiation with the use of the word 'seeking to' which is not following the proscribed format of UK Policy Paper 'Biodiversity 2020'. Very little on Dark Skies policies, despite Rother's Climate Strategy published six years ago. There is great reliance on dealing with ecological issues in a colour-coded	The methodology employed for assessing sites, and the reasons for this, are set out in the SA report. The Council considers the approach to SA of sites is proportionate to this stage of the plan process, acknowledging that further detailed assessments may be carried out through the development management process, where necessary and appropriate. Many of the comments refer to the Local Plan proposals rather than the SA Report.

Respondent	Support/Object	Summary of comments	Rother District Council response
		impact design, where neutral effects are deemed preferred options, and red is the worst impact. However, with enhancements and BNG the issues are addressed. So they say. Readers of the earlier Local Plan will not be surprised to see repetition of all the applicable policies for the protection of habitats and species. Very little is offered new. Perhaps there is a single gain for the proposal for Swift boxes on new developments, but Rother have missed out House Martin nest cups on all new builds, as House Martins are declining too. ‘Conserve and Enhance’ legal obligations - sweet words from the 1980s no less! On the long-established issue to ‘conserve and enhance’ habitats and species, there are five references, four of them are for nature conservation, the other is to conserve archaeological sites. Under ‘Biodiversity’ RDC added a third dimension ‘protected, conserved and enhanced’ to ‘enhance priority species and habitats, and increase local biodiversity’. Also, to ‘achieve a net gain in biodiversity. And ‘protect and enhance ecological networks.’ It is good the RDC state that one should ‘Conserve and enhance the High Weald National Landscape in line with the aims and objectives of the 2024-2029 Management Plan’ especially as they single out on place in particular, around Bewl Water, and that they also have another Duty - for Protected Landscapes (Under SA Objectives). Take-aways: • So, no change in wanting to ‘conserve and enhance’ where needed, and, in the 83% of RDC that is in the AONL, then follow the latest AONL	

Respondent	Support/Object	Summary of comments	Rother District Council response
		Management Plan. • RDC legally must proscribe that a net gain has to be achieved (they do not declare any % gain) – just that net gain should be achieved. Nationwide it is mandatory for 10%. They have rowed back on previous local increase to 20%. • They also seek to enhance ecological networks – no particular change there but more emphasis than usual. • No mention of Buglife’s initiative to connect habitats especially for bees – that many councils have adopted. And routes for pollinators, action for pollinators.... Gov.uk’s initiative on ‘stepping stones’, ‘joined-up habitats’ etc. More on this please. Wellbeing and Community There are up to 76 citations on wellbeing, which is beginning to be mentioned increasingly in UK legal texts and guidances. In Rother it is usually in the context of ‘Health and Wellbeing’. So get out there and enjoy the countryside. The Council are behind you. Community is cited 40 times involved with ‘delivery of services’ to communities to improve connectivity, health and wellbeing. Nothing about financially aiding communities, only getting them well connected. Roll on better (i.e. reliable) bus services and EV connectors as promised a while ago, maybe two years ago. The Recs await installation. Development on Allocated Sites The problem is there is no more brownfield in some rural parishes, it has to go on greenfield. Take-aways:	

Respondent	Support/Object	Summary of comments	Rother District Council response
		• There is no brownfield in Crowhurst, probably none in Catsfield. So all allocated sites are on greenfield. • It is interesting that Rother will 'seek to locate' development on lower grade agricultural land, i.e. NOT on BMV (Best Most Valuable Land) i.e. not on Grade 1 & 2 soils. I am not sure that all Allocated Sites have been assessed for soil grading as many are greenfield. All three sites in Catsfield and all three in Crowhurst are on greenfield of indeterminate soil grading. Biodiversity and Protection of Habitats Take-aways: • Although there is a commitment under SA 2. (above) to protect, conserve and enhance biodiversity' the Commentary is very weak, for it admits that 'some biodiversity may be impacted by development.' Well yes, and as the small print says, an opportunity for BNG. • RDC seeks to achieve a neutral impact of any development (yellow above). It does not indicate that significant impacts can be mitigated. Take-aways: • Good to see that LWS (Local Wildlife Sites) could potentially be affected by development, and the threat to them is recognised. Always a thorny issue in planning applications, as the law is not as strong for sites such as UK SSSIs and EU Natura Sites (SPA, SAC, Ramsars) all of which are applicable round here (Catsfield and Crowhurst). • Networks and corridors are recognised, well promoted for the first time. Good to see. We proposed all that for the Crowhurst Solar Farm and it	

Respondent	Support/Object	Summary of comments	Rother District Council response
		was approved! • Appropriate management is recommended to ensure that there is no significant adverse impacts occur on ANY UK and EU Natura sites, as well as anywhere within the AONL. Ditto above for Crowhurst. • All good proposals – the reality will be how it will be applied. Adjacency to Ancient Woodlands, and Priority Habitats Take-aways: • RDC seem to be going for a 50m buffer away from i) Ancient Woodlands, ii) TPOs or iii) Priority Habitats. • Building within 50m of the above, is deemed to be just Minor Negative, which seems to suggest that construction is possible, but would need to be mitigated. However, it goes against their aim (see previous) of seeking to get a Neutral impact – thus below 50m is something that would not be tolerated. Confusing and Contradictory. • The colour coded table suggests that if a site is within 50m of an Ancient Woodland it can be mitigated successfully with a bit of enhancement or BNG. Not that it should not be permitted within 50m. Interim Sustainability Appraisal in support of the Regulation 18 stage consultation on the Development Strategy and Site Allocations Draft Rother Local Plan 2025 – 2042. 209pp p. 16 Fig 4. SA Framework... Under Energy and Water Consumption: no mention of, or inclusion of, the need to ensure that a new development will not negatively impact upon the ground water of a nearby Nature 2000 site. NB. Natural England define 'nearby' as up to 12km. If a Natura 2000 site is a wetland then	

Respondent	Support/Object	Summary of comments	Rother District Council response
		development of housing would have to prove that none of the groundwater waters are mopped up to the detriment of the protected EU habitats. Protection of Pevensey wetlands come to mind. Air pollution has not been properly addressed, as I have seen other councils supporting the law regarding proximity to EU site, even when 'nearby'. Re. p. 157 Methodology for proposed site allocation, Infrastructure needs: Under Green and blue infrastructure, and flood defence.: Biodiversity and nature conservation Comment: Under 'Minor Negative' column, Rother are proposing that if a site is located in an IRZ (Impact Risk Zone) that relevant usage, residential, or commercial; would be OK, just Minor Negative. This translates to just do a BNG and it will be mitigated sufficiently. I am not sure this is best conservation strategy to protect nature properly. Mitigation is not always the solution to get round the environment constraint. Leaving the habitat alone in an IRZ is sometimes best. Under Figure 7: SA scoring key Symbol Explanation ++ How shall I put this. It is sad that ecology has come to this. Colour-coded deference to the natural world that gets in the way of development. And how to manage it. Agreed Rother have to find a way, and this is one way, albeit formulaic. They have few options. None easy. To be in a RED zone – just mitigate with enhancements and BNG to prove it! Is that the long-term solution for nature conservation?	

Respondent	Support/Object	Summary of comments	Rother District Council response
		Sure, forever, we, ecologists have assessed an impact on the environment as either negative or positive environmental impact or declared that an impact is significant or not significant. And we have conserved and enhanced and BNG'd to prove that a gain is actually a gain. If we planted a one kilometre native hedgerow that would be a significant and positive environmental gain. It has always been. Why need to prove it with an algorithm? You can see it by satellite that it is a new hedgerow. A gain. I have colleagues who have planted woodlands. You can admire the new woods on satellite maps. A gain for sure. Without algorithms to prove it. Rother have climbed down on to ask for 20% net gain instead of the nationwide mandatory 10% gain. New policy (N1): They say that LPAs should not attempt to levy higher biodiversity net gain requirements than the statutory level, except on specific site allocations where fully justified. But measures to support biodiversity, including "swift bricks"...The addition of swift bricks is to be applauded. House Martin artificial cups should also be included as it is a Red Species under severe decline. With Rother seeking to build 15,504 houses over the next 17 years, that is 15,504 house footprints (at 67.8sqm a footprint) lost, mostly on greenfield land, lost permanently with potential increased flooding issues. Interim Sustainability Appraisal (January 2026) Ends on 23 March 2026 (6 days remaining)	

Respondent	Support/Object	Summary of comments	Rother District Council response
		Development Strategy and Site Introductions, Rother District Local Plan 2025 – 2042 Interim Consultation Document, pp38 Re. Strategic Spatial Objectives, list 12 Objectives. None are for Dark Skies despite Rother's Climate Strategy, 2020 saying this was an objective to achieve, six years ago! There are a few AONL parishes working towards International Dark Skies Community Certification and their continued efforts for the wellbeing of everyone have not been recognized or promoted. In many cases residents are ahead of the council in their furthering the benefits of Dark Skies. From Rother's Climate Change Strategy 2020 Objectives 1. The built environment will be low carbon and climate resilient. 2. The need to travel will be reduced, those that do will be on foot, bike, public transport, or in a low/zero carbon vehicle. 3. The district will produce less waste and support a thriving circular economy. 4. Nature will be in recovery across the district. 5. Clean, renewable energy will be produced locally. Six years on. Most objectives are not realised. Recovery has been painfully slow, and energy is not yet produced locally. NPPF comments Suggested change from "great weight" to "substantial weight" on the importance of conserving and enhancing natural beauty. Yes, this is good. Are they trying to say 'significant'? I am not sure I found the answers to the following two topics: • Clarification sought of what constitutes an 'acceptable loss' of trees, woodlands and hedgerows.	

Respondent	Support/Object	Summary of comments	Rother District Council response
		Whether the use of the Capital value Asset for Amenity Trees (CAVAT) tool will provide a justification for avoidable tree loss.	

Representations on the Interim SA Report (2024)

Respondent	Summary of comments	Rother District Council response
Tunbridge Wells Borough Council	It would be helpful to understand more on the reasons why the sustainable transport corridor aspect of most sustainable development strategy option (SDO3B) was disregarded in its entirety when its less sustainable counterpart (SDO3A) is included as part of the development strategy. Para 5.2.3 states the sustainable transport corridor is not considered deliverable within the plan period. However, if Bexhill is going to be subject to growth through the Local Plan, the sustainable transport corridor could be a longer-term ambition. The SA should clarify whether the development around Bexhill will work towards or set the framework for the sustainable transport corridor coming forward in the future, or at least not hinder its potential. (Tunbridge Wells Borough Council)	The option for the transport corridor was not taken forward as representations to the first Regulation 18 consultation draft Local Plan (2024), including from statutory bodies, raised concerns with the deliverability of this option due to a lack of identified funding and justification for potential works to the Strategic Road Network, and need for further cross-boundary discussions with relevant authorities. This has now been explained in the second Regulation 18 (2026) draft Local Plan.
Marine Management Organisation	It is recommended that the South Inshore and Offshore Marine Plan is included in the Sustainability Appraisal/Strategic Environmental Assessment Scoping Report, for instance, in Section 6. Climate, Flooding and Coastal Change.	The South Inshore and Offshore Marine Plan has now been included in the policy context update, in this Interim Sustainability Appraisal (2026), and used to inform the SA.

Respondent	Summary of comments	Rother District Council response
Home Builders Federation	The Development Strategy Background Paper sets out 13 spatial development options for the Borough with the Council noting that these have all been individually assessed through the Sustainability Appraisal. What is notable is that not all of these options have indicated estimates as to how much development each would deliver. This makes it difficult to consider how appropriate these are, and of course to effectively appraise each option. With regard housing for example Figure 11 of the SA/SEA shows that against the housing objective each option scores a double or single positive. Given that even a combination of each of these options sees housing supply fall well short of meeting housing needs this assessment within the SA/SEA would appear to be fundamentally flawed and cannot be a robust assessment as to the impacts not only with regard to housing but many of the other options. In order to assess the impact of a development option the council must have some idea as to the scale of development that would be expected. From these 13 options the Council have then arrived at the proposed spatial development strategy. However, what is notable is that only one spatial development strategy has been considered from the 13 options. The justification for not considering other reasonable alternatives is that all potential sites have been considered within the SA, including those rejected through the HELAA that these assessments form the consideration of reasonable alternatives. However, HBF would consider such an approach to be inappropriate as it fails to even consider the potential for the Council meeting its housing needs in full through an alternative strategy. Whilst this would require the Council to assesses strategies potentially including some sites that have been rejected within the HELAA, it would have enabled the council to assess the overall harm arising from different spatial strategies and compared to the potential benefits of such strategies against the harm. In essence the Council have rejected potential strategies that may have had more of an impact in landscape terms but had significantly higher social and economic benefits which may have outweighed that harm. In essence the collective benefits of further development may outweigh the harm of these alternative strategies with regard to landscape or other issues,	The reasonable alternatives for the Development Strategy were initially derived as in principle options, which were then subject to SA in the Interim SA (2024), to inform early-stage work on the draft Local Plan. Subsequent to this, the Council has updated the Housing and Economic Land Availability Assessment (2026), which provides up-to-date evidence of land that is suitable, available and achievable for development within the plan period. Through this process, the Council considers that it has left 'no stone unturned' in its efforts to identify land to meet the district's development needs. The HELAA has informed considerations for the Development Strategy, as this must be realistic and deliverable, and crucially based on land availability (together with other planning policy considerations, such as infrastructure delivery including transport infrastructure; statutory requirements for protecting the National Landscape;

Respondent	Summary of comments	Rother District Council response
	especially where the harm can be mitigated but the potential of such strategies has been ignored. The Council have also failed to assess the potential; impact of not meeting need in full on neighbouring areas and adding to the cumulative shortfall in East Sussex. The impact of not meeting needs will have wider consequences and these need to be clearly set out within the SA. In only considering sites this wider assessment of different strategies has not been undertaken by the council and as such the SA has failed to properly assess reasonable alternatives with regard the spatial strategy and cannot be relied on by the council to support its plan making process. The Council must consider reasonable alternative strategies that meeting housing needs alongside the strategy set out in the draft local plan to consider whether they may offer a more sustainable approach to development in Rother. Sustainability Appraisal of the Proposed Strategy What is notable about the SA of the proposed strategy with regard to housing is the way the question is posed within the assessment framework. The SA objective (8) for housing in the assessment of the strategy policies in the Draft Local Plan asks whether the strategy provides more opportunities for everyone to be in a suitable home to meet their needs. Such the objective has been deliberately written to allow the council to show this as being a positive assessment within the SA with regard to this objective. This is disingenuous and means that the SA has no credibility. In assessing the sustainability of a strategy a policy, the Council should be asking whether it meets the identified need for market and affordable housing in Rother. It is notable that the Council's SA makes no reference, or at least we could find no reference, to housing needs and the shortfall in meeting those needs as a result of the proposed strategy. Alongside this no reference is made to fact that neighbouring authorities are also unable to meet their own housing needs leaving a substantial shortfall against identified needs over the next 15 years of around 27,500 homes. What is evident is that when considered against a more appropriate phrased	and conservation of designated habitats sites, to name a few). The Interim SA (2026) has assessed a range of density options, based on available land and sites for housing and other types of development; this has provided the basis for scenario testing of the total amount of development that could be delivered across the district under various density assumptions. This work has been undertaken in the context of the National Planning Policy Framework, and the identified Local Housing Need figure for Rother, as discussed in the SA report and also extensively in the draft Local Plan (2026).

Respondent	Summary of comments	Rother District Council response
	objective the local plan will have significant negative consequences that need to be properly considered. The scale of the shortfall in market and affordable housing would also impact on other objectives, such as those relating to health and wellbeing, with a higher chance of negative health outcomes due to a lack of affordable and good quality accommodation. The outcome in relation to climate change would also be different with more people living in less energy efficient homes that emit significantly more carbon. The Council may decide that the negative impacts arising from such a significant shortfall in housing are acceptable, but in arriving at that conclusion it must ensure that such issues are front and centre in its decision making and the documents that support it.	
Persimmon Homes	In the context of the above we note that the SA in section 5, in reviewing the Spatial Development Strategy Options, does not appear to look at different scales of growth relative to the LHN (both capped and uncapped) or the implications of only delivering the scale of housing proposed, just a variety of different spatial options where the scale of development is unquantified, despite the fact one of the SA objectives is that 'More opportunities are provided for everyone to be in a suitable home to meet their needs.' The above belies the evidence base and the various reasons why the council need to meet their LHN / an uplift to the LHN should be considered further, as summarised in the commentary below... The above demonstrates the need for the plan to deliver the LHN in full/ an uplift to the LHN figure to boost the supply of open market and affordable homes and thus help address the affordable housing needs of the District. Said approach would also reflect on spatial objective 4 – to respond to the housing crisis and help facilitate the delivery of housing to meet the needs of different groups in the community, by maximising the potential opportunities for residential development in sustainable and deliverable locations, helping to deliver affordable housing, and ensuring development is viable and supports growth in the district by providing certainty for developers through site	The reasonable alternatives for the Development Strategy were initially derived as in principle options, which were then subject to SA in the Interim SA (2024), to inform early-stage work on the draft Local Plan. Subsequent to this, the Council has updated the Housing and Economic Land Availability Assessment (2026), which provides up-to-date evidence of land that is suitable, available and achievable for development within the plan period. Through this process, the Council considers that it has left 'no stone unturned' in its efforts to identify land to meet the district's development needs.

Respondent	Summary of comments	Rother District Council response
	allocations and clear planning policies. The SA in reviewing the merits of the alternative spatial options appears to have paid little regard to these fundamental points... To this end, we would stress the need for the SA to not only look at various Spatial Development Strategies, but to express these in the context of overall housing provision and assess not only a strategy that reflects the capped LHN, but both the uncapped LHN and indeed something that falls short of the capped LHN so that the effects of all reasonable alternatives are properly taken into consideration. As currently drafted the SA does not in our opinion adequately addresses the issues raised above or look to address the issue of unmet needs from adjacent authorities – see below... As set out above we note that the SA in scoring the Development Strategy, at Figures 11 and 12 does not actually comment upon the quantum of development the different options would deliver and how this would relate to the LHN, or indeed address the issue of the unmet needs of neighbours. Given SA objective 8 on housing this is somewhat surprising, as is the fact that no one option appears to have been chosen as the preferred option; albeit SDO3B (Bexhill Greenfield Growth Option 2: with New Multi-modal Transport Corridor) appears to score most favourable, followed by SDO6 (Brownfield Intensification and Redevelopment), which as it would totally fail to meet the LHN seems somewhat perverse, especially when figure 11 scores it as ‘Option supports the objective, or elements of the objective on balance, although effects may be minor’. Surely it would be ‘Option appears to conflict with the objective on balance and may result in minor adverse effects’ or indeed even ‘Potentially significant adverse effects’. Similarly, the scoring of SDO11 (Growth in settlements with train stations or sustainable transport alternatives) in figure 12 seems somewhat odd²¹ given its based on sustainable transport. To this end we also note that in a number of occasions, SOD4 and SOD5 for instance, growth is said to be resisted by virtue of land availability based on environmental and topographical constraints. Given the scale of unmet need currently proposed we would respectfully suggest the council need to do more to establish whether additional land in these areas is available/ could be developed as no stone should be left unturned in trying to meet the	The HELAA has informed considerations for the Development Strategy, as this must be realistic and deliverable, and crucially based on land availability (together with other planning policy considerations, such as infrastructure delivery including transport infrastructure; statutory requirements for protecting the National Landscape; and conservation of designated habitats sites, to name a few). The Interim SA (2026) has assessed a range of density options, based on available land and sites for housing and other types of development; this has provided the basis for scenario testing of the total amount of development that could be delivered across the district under various density assumptions. This work has been undertaken in the context of the National Planning Policy Framework, and the identified Local Housing Need figure for Rother, as discussed in the SA report and also extensively in the draft Local Plan (2026).

Respondent	Summary of comments	Rother District Council response
	LHN. As it stands, the SA lacks the necessary robustness required as it is impossible to assess the impact and weigh benefits and harm of each development strategy without know scale of delivery associated with each option... Having regard to the above we feel it's imperative that if the SA is to be effective the next iteration needs to assess the Development Strategy in the context of the LHN and how the council are to accommodate this/ the implications of not accommodating it/ over delivering to address adjacent authorities' unmet needs. (Persimmon Homes)	
East Sussex County Council	Public Health welcomes the integration of a set of Health Impact Assessment criteria and the emphasis this has given to the consideration of health and wellbeing within the Plan. The HIA criteria provides a systematic process to work through the health and wellbeing considerations and impacts of the local plan on the population. Public Health generally supports the conclusions of the appraisal which reflects the strong collaboration with us and the strength of policies to support the overarching health and wellbeing objective for the Local Plan.	Noted.
Planning agent	The April 2024 Sustainability Appraisal provides no basis on which to reject TIC0039.	The SA is one of multiple considerations used to inform the selection of proposed site allocation policies for the Local Plan.

Representations on the SA/SEA Scoping Report

Consultee	Section/Area of Report	Summary of Response/Comments	Action/Response to the Scoping Report
Statutory Consultee – Historic England	Whole Document	Content that the Scoping report for Rother and Hastings local plans adequately covers the issues that may arise in respect of the potential effects of proposed development sites on heritage assets. Historic England has prepared generic guidance with regards to their involvement in the various stages of the local plan process which you may find helpful in preparing the Sustainability Appraisal. This is available to download here: https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/. The opinion is based on the information provided by the Council's and for the avoidance of doubt does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the plan which is the subject to consultation, and which may, despite the SEA, have adverse effects on the historic environment.	No action required. The Council will take account of guidance when progressing the SA
Statutory Consultee – Environment Agency	Section 6 – Climate, Flooding and Coastal Change	Para 95 - Perhaps just mention that the SFRA is a living document and is currently been updated. Strategic policies should be based on the best and latest available information. Para 99 - It may be appropriate to reference The River Basin Management Plan in Section 4 as well. No reference to the South East River Basin Flood Risk Management Plan https://www.gov.uk/government/publications/south-east-river-basin-district-flood-risk-management-plan No reference to the East Sussex local Flood Risk Management Strategy https://www.eastsussex.gov.uk/environment/flooding/localfloodriskmanagementstrategy/	The Council will reference the SFRA as a living document and will add reference to the two documents and insert web-links
	Section 9 – Land and Water Quality	Groundwater protection Note and welcome the inclusion of objectives with regard to water efficiency and land and water quality, but note that the new Local Plan should include specific policies to address brownfield sites, groundwater protection and key infrastructure development relating to surface water and foul water drainage, which would also be usefully stated in relevant text in the SA/SEA.	Will consider groundwater protection when developing policies in the Local Plan Groundwater protection is now referenced as a key issue in the development of the objective.

Consultee	Section/Area of Report	Summary of Response/Comments	Action/Response to the Scoping Report
		Waste No comments at the moment, as the information in this report is very generic in relation to waste activities. We are happy to review any specific waste activities or sites and provide waste advice for them.	We note EAs comments to review any waste activities or sites moving forward.
Statutory Consultee – Natural England	SA Framework Indicators	A general observation is that some of the proposed monitoring indicators appear to monitor wider changes, rather than the effects of the plan itself. We advise that consideration is given to how indicators will work in practice, and in particular how they will monitor the effects of the plan as opposed to wider changes. We advise it would be best to resolve such matters at an earlier stage, and whilst it is not Natural England's role to prescribe what indicators should be adopted, advice on monitoring indicators is provided in following sections, where relevant.	The Council will review each indicator to ensure that it is monitoring an effect of the plan and not a wider impact.
	Section 4 - Biodiversity	With regards to baseline data, the Sussex Biodiversity Records Centre hold a range of data on the natural environment. Information on Sites of Special Scientific Interest (SSSI) are available on Natural England's Designated Sites Viewer, including information on SSSI condition. Magic provides various data which you may find useful. Mapping layers include data in relation to Ancient Woodland, Local Nature Reserves, Priority Habitat Inventory, Sites of Special Scientific Interest (including their impact risk zones), Special Areas of Conservation, Special Protection Areas, and Ramsar Sites (including, where relevant, marine designations). You may also wish to draw on more detailed information on Special Areas of Conservation and Special Protection Areas from the Conservation Objectives and Site Improvement Plans for each site. Whilst SA objective 2 refers broadly to protection and enhancement of biodiversity, there are no references to biodiversity net gain (BNG). BNG is an approach that uses the development process to leave biodiversity in a better state than before, securing wider benefits for people and the environment, and is enshrined within NPPF paragraphs 9, 109 and 152. The Government has announced that net gains for biodiversity will be mandated through the forthcoming Environment Bill and increasing numbers of developers and local authorities are adopting biodiversity net gain. We advise that relevant objectives, appraisal questions and indicators include reference to BNG, to ensure your authorities can secure BNG through your forthcoming plans. In addition to providing benefits to biodiversity, it is important to note that projects securing BNG provide opportunities to deliver other	Comments are noted on the availability of baseline data. The Council will refer to Biodiversity Net Gain, green infrastructure and habitat connectivity within the key issues section rather than the objective itself. Seeking biodiversity net gain and enhancements to green infrastructure through development will ensure this objective can be met. The Council will add the following appraisal question to SA Objective 2 'achieve a net gain in biodiversity' The Council will draw out the priority habitats and species of relevance in its indicators.

Consultee	Section/Area of Report	Summary of Response/Comments	Action/Response to the Scoping Report
		benefits to local people and the environment, such as provision of accessible greenspace, sustainable drainage, outdoor learning opportunities, and it would be beneficial to consider how this relates to other aspects of your plans (including SA). Similarly, references to green infrastructure and habitat connectivity do not appear to be included within the proposed framework. The maintenance of existing and creation of new green infrastructure is key to securing resilient and coherent ecosystems and is also of relevance to adaptation to climate change. We suggest the inclusion of text which recognises the importance of green infrastructure and habitat connectivity, including the protection and enhancement of existing features but also the creation of new features, which can align with any BNG approaches developed for you area. You may wish to clarify reference to Biodiversity Action Plans, including reference to priority habitats and species, noting that plans/proposals resulting in impacts to irreplaceable habitats should not be supported (NPPF para 11 and 175). With regards to providing measurable and plan-specific indicators, the reference to the Area of Outstanding Natural Beauty (AONB) is vague. The indicator could be clarified with reference to how the option/policy/proposal supports the aims and objectives of the High Weald AONB Management Plan and the purposes of designation of the AONB (to protect and enhance natural beauty). Correspondingly, we advise the appraisal questions include reference to the AONB. Finally, you may wish to consider clarifying how the AONB is considered in relation to objectives for biodiversity and natural landscape, which are currently presented separately but with similar indicators. You may wish to consider the following with regard to monitoring/indicators for biodiversity objectives, or when informing appraisal questions: • Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance (with commentary on area/nature of impact) • Contributions to net gain (with relevant commentary) • Percentage of development contributing to green infrastructure (with commentary on the contribution) • Amount of new development in AONB (with commentary on likely impact)	The Council has developed its SA framework with consideration of the environmental indicators that are readily available to the Council and as such have included indicators that the Council receives annually from the Sussex Biodiversity Record Centre. The Council will consider further monitoring indicators if necessary as the Local Plan progresses. An additional appraisal question has been provided to SA Objective 15 to reflect the objectives of the AONB Management Plan

Consultee	Section/Area of Report	Summary of Response/Comments	Action/Response to the Scoping Report
	Section 7 – Population, Health and Well-Being	Objective 9 appears to include reference to access to open (recreational) space. However, this is not reflected in the indicators against which the objective can be assessed. Given that access to open space is also addressed through objective 15, you may wish to consider clarifying references to open space and recreational space. This can avoid duplication and/or confusion between objectives, and to achieve a clear and consistent approach to your assessments.	To avoid crossover SA objective 9 has been amended to remove reference to recreation space, which is covered under objective 15.
	Section 9 – Land and Water Quality	With reference to objective 14, you may wish to consider reference to the requirements of the water framework directive and the impacts on relevant waterbodies of achieving good ecological status, or any site-specific water quality targets. This will encompass assessment of the plan on a wider range of receptors which could be impacted by water pollution/alterd water quality as a result of the plans.	Agreed to include reference to this as part of the key issues under para 172 as an introduction to the objective.
	Section 10 – Natural Landscape	Advice on access to open space is referenced under section 5 of this letter, however objectives under section 10 appear to refer specifically to access to open green space; you may wish to consider if a distinction between the two objectives need to be made. Although baseline trends for this theme (within the Scoping Report) do not appear to include specific reference to access to open and green space data, it is included in Appendix 2. It would be beneficial to reference the detailed indicators from Appendix 2 as indicators in the SA framework document. As advised under section 2 of this letter, it would be beneficial to clarify how assessment against AONB indicators differs from that/those associated with ‘biodiversity’ objectives. Also note that the NPPF requires designated landscapes to be conserved and enhanced.	The Council will consider moving the indicator for access to woodland to section 10 for the final SA if it is deemed necessary.
	Additional Comments in relation to the Pevensy Levels SAC and Ramsar Site	We are aware of the significant pressure on local authorities to provide housing, and the challenges this brings in relation to securing sustainable development. As you are already aware, the wetland environment of the Pevensy Levels is susceptible to deterioration brought about by water pollution from surface water run-off from large levels of planned development. Without suitable measures, runoff from developed areas (including for example sediment, litter, oils grit, metals, fertiliser, pesticides, animal waste, salts and pathogens) in the catchment would eventually enter the watercourses of the Pevensy Levels, resulting in deterioration of the water quality. In addition, water availability is a concern in the catchment, and whilst the area is subject to a water level management plan, altered run-off patterns resulting from development can impact the hydrology of the area. We are committed to continuing to work with your authority to support sustainable development which does not adversely impact designated sites. This includes work to	These comments can be addressed as part of the development of the Local Plan, the Sustainability Appraisal and the Habitats Regulation Assessment.

Consultee	Section/Area of Report	Summary of Response/Comments	Action/Response to the Scoping Report
		secure appropriate solutions for suitable development in the Pevensey catchment. We have worked with your authority to secure robust policy and approaches in this regard, including advice on sustainable drainage. We look forward to continuing engagement to ensure both strategic and site specific measures to protect designated sites are included in future local plan documents. I attach at Annex A our current advice on development within the Pevensey Levels (which you are already familiar with). In addition, please note that 'Pevensey Levels SAC European Site Conservation Objectives: Supplementary advice on conserving and restoring site features' was published on 25 March 2019 and is available in the appendix.	
Highways England	Whole Document	Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with policies and proposals that have the potential to impact the safe and efficient operation of the SRN. Overall, Highways England supports strategies, policies and land allocations which will support alternatives to the car and promote the operation of a safe and reliable transport network. We note that paragraph 222 of the SA/SEA Scoping Report refers to Rother District Council's Draft Environmental Strategy. We have recently commented on the Draft Environment Strategy and ask that you are mindful of the matters we raised. We do not wish to make any comments on the Rother District Council and Hastings Borough Council SA/SEA Scoping Report. However, please continue to consult us as the Local Plan and SA/SEA process develop at PlanningSE@highwaysengland.co.uk.	Consider HE's response to RDC's Draft Environment Strategy as below.
Highways England	Matters raised on RDC'S Draft	We are concerned with policies and proposals that have the potential to impact the safe and efficient operation of the strategic road network. In the case of Rother District, this relates to the A259 and A21 trunk road.	The Council notes Highway England's comments and will continue to liaise with them as the Local Plan is developed. An

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	Environmental Strategy	Overall, Highways England supports strategies, policies and land allocations which will support alternatives to the car and promote the operation of a safe and reliable transport network. We note that Section 3 on air Quality within the Draft Environmental Strategy 2020-2030 document includes the action “<i>We will explore options to make urban areas, such as Bexhill town centre, car free or restricted vehicular access.</i>” Since the A259 trunk road runs through Bexhill, we will wish to ensure that any restrictions on car or vehicular access in Bexhill town centre does not have a detrimental effect on the A259 either from a capacity or road safety perspective. We suggest you add Highways England as a partner for the first bullet point in the table on page 22. Please continue to consult us as the Environment Strategy develops. In particular, please discuss any options you are considering to reduce vehicular traffic in urban areas such as Bexhill.	early engagement consultation stage undertaken in August-October 2020 will assist with this. No changes required at this stage to the SA.
Sport England	Section 7 – Population, Health and Wellbeing	Para 117 – Rother and Hasting PPS. The PPS identifies the need for both Councils to protect and prevent the loss of existing sports pitches and seek to deliver an increased supply of suitable pitches in line with population growth. These need to be in appropriate locations accessible by a range of transport options including active and sustainable modes (walking and cycling). I would suggest that a specific measure of how local plan policies perform in this respect should be added. Para 126 - 30 minutes travel to key services by public transport or walking will be unrealistic in much of rural Rother. In urban areas some of these services should be much closer than 30 minutes PT/walking distance/cycling distance i.e. local food shops, primary schools and GPs would be closer than a town centre or hospital. 15 or 20 mins is a more appropriate indicator and would set a more aspirational target for sustainable neighbourhoods.	Currently the Council is not able to monitor the net change in sports pitch provision, so consider it not appropriate to include at this stage. The Council will add data in relation to 15/20mins access by public transport in order to include this.
	SA Framework Indicators	9. improve accessibility and affordability to essential local services list in brackets to include formal and informal indoor and outdoor sport and recreational facilities Promote compact development and walkable neighbourhoods (15 – 20 minutes) See comment above re: 30 minutes travel time	The Council will add data in relation to 15/20mins access by public transport in order to include this.

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Hastings and Rother CCG	Whole Document	Hastings and Rother contains the eight most deprived council wards in East Sussex. These experiences of deprivation contribute to poorer health outcomes with higher rates of long-term illness, disabilities, cancer, lung disease and heart problems as compared with the rest of the county. The CCG looks forward to continuing our collaborative work with the two councils. This has been developed in recent years through the Healthy Hastings and Rother Programme and our membership of the Local Strategic Partnerships and other themed partnerships such as Safer Communities, CHART (Connecting Hastings and Rother Together), Active Hastings and Active Rother and our joint work to support vulnerable population groups such as Rough Sleepers. We also look forward to working with the two Councils to ensure that the infrastructure delivered as part of the resulting local plans, is considered in partnership with the health sector. This is to ensure that primary care provision and other key health infrastructure (notably that provided by East Sussex Healthcare NHS Trust and Sussex Partnership Foundation NHS Trust), is considered alongside the growing needs and size of the local population. In light of the current response to Covid 19 for local people, it will be important to consider our learning as we further develop these plans in partnership. For example, learning from the establishment of Community Hubs and considering plans to address further anticipated health inequalities resulting from Covid 19, alongside known and expected impacts on local people in relation to their protected characteristics (for example our Black and Minority Ethnic (BAME) communities). Please note that within the documents provided as part of this consultation, the CCG is referred to as Hastings and Rother Clinical Commissioning Group. Can this please be changed to East Sussex NHS Clinical Commissioning Group. The CCG has been asked to nominate an officer who will be responsible for responding to the Local Plans and providing input to their key developments stages as identified by each Council. Richard Watson, Assistant Head of Health, Wellbeing and Partnerships has been identified as the lead contact for the CCG and he will co-ordinate work with other CCG officers as appropriate, for example those representing primary care services.	Reference to Hastings and Rother CCG will be changed to East Sussex NHS CCG. The Council look forward to working with the East Sussex NHS CCG in developing its Local Plan.

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	Section 3 – Air quality	Objective 1 - Reduce air pollution from transport and development and improve air quality - We would support measures to encourage local people to use sustainable forms of transport, to support good air quality and the associated positive impact on the health and wellbeing of local people this has. We also recognise that along with the CCG, many organisations have put in place work from home arrangements for staff, in response to the Covid-19 pandemic. As a result, there is learning from this approach, which can contribute to improved health and wellbeing for local people such as air quality improvements.	These comments are noted by the Council and these will help shape the Local Plan. No change required to the SA.
	Section 4 – Biodiversity	Objective 2 - Biodiversity is protected, conserved and enhanced - We would support the protection, conservation and enhancement of outdoor spaces that promote positive physical and mental well-being for the public.	No action required.
	Section 5 – Energy and Water Consumption	Objective 3 - The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation) and preparedness for its impacts (adaptation). Objective 4 - Minimise water consumption - We would support the development of renewable energy that is embedded within community infrastructure. This is in light of the contribution that this could make to lowering energy costs for NHS infrastructure, therefore supporting NHS financial sustainability. In addition, for local people, reduced energy costs creates increased personal income, which contributes to the healthy choices local people can make for themselves.	These comments are noted by the Council and these will help shape the Local Plan. No change required to the SA.
	Section 6 – Climate, Flooding and Coastal Change	Objective 5 - The risk of flooding (fluvial, tidal and surface water) is managed and reduced, now and in the future. Objective 6 - The risk of coastal erosion is managed and reduced, now and in the future - Acknowledging the impact of flooding on the health and wellbeing of those affected, we would support considered approaches to flood risk mitigation. We would also suggest that initiatives related to coastal erosion and the associated public safety issues are considered in partnership with relevant organisations.	These comments are noted by the Council and these will help shape the Local Plan. No change required to the SA.

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	Section 7 – Population, Health and Wellbeing	Objective 7 - The health and wellbeing of the population is improved and inequalities in health are reduced. Objective 8 - More opportunities are provided for everyone to be in a suitable home to meet their needs. Objective 9 - All sectors of the community have improved accessibility to services, facilities, jobs, and social, cultural and recreational opportunities. Objective 10 - Safe and secure environments are created and there is a reduction in crime and the fear of crime - The NHS Long Term Plan commits the NHS and therefore the CCG to a greater focus on prevention and on health inequalities. Hastings and Rother contains the eight most deprived council wards in East Sussex. Social and economic deprivation contribute to significant health inequalities such as higher rates of long-term illness, disabilities, cancer, lung disease and heart problems as compared with the rest of England. Deprivation also imposes significant problems at a personal and community level, leading to low education attainment, poor employment prospects, low incomes, inability to find and afford suitable accommodation, crime and fear of crime and poor community cohesion. Poor health caused by health inequalities can also contribute to further social and economic exclusion thus exacerbating and perpetuating inequalities. We also anticipate that these health inequalities will deepen as a consequence of Covid 19. We value the opportunity to further develop these plans, in light of the known and expected impact Covid 19 has had on communities in relation to protected characteristics (for example BAME communities). We would support positive measures to minimise the impacts of poor housing conditions on the health and wellbeing of local people (for example recognising the link between poor housing conditions and exacerbation of Long Term Conditions for people such as respiratory conditions). We therefore support the development of sustainable action by District and Borough Councils as part of an integrated approach to achieving positive outcomes, in partnership with the NHS and other statutory, voluntary and community sector partners.	These comments are noted by the Council and these will help shape the Local Plan. Amendments will be made to para 112, 113 and 115 to insert the suggested web-links provided.

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		Several local strategy and web references need updating within this section of the scoping report. These are as follows: Para. 112 - Reference and weblink should now be the East Sussex Health and Social Care Plan. https://www.seshealthandcare.org.uk/wp-content/uploads/2019/10/191028-DRAFT-Appendix-East-Sussex-place-plan-v5.pdf Deleting reference to page 7 of the previous Five Year Plan. Para. 113 - All CCG references to be updated to East Sussex rather than Hastings and Rother. - Weblink for Healthy Hastings and Rother Programme information to be updated to https://www.eastsussexccg.nhs.uk/priorities-and-programmes/reducing-health-inequalities/healthy-hastings-and-rother - Weblink for Healthy Hastings and Rother 2019 summary to be updated to https://www.eastsussexccg.nhs.uk/wp-content/uploads/sites/3/2020/03/Health-Inequalities-A5-2019-FINAL.pdf Para. 115 - Weblink should now be to the Active Rother Partnership strategy https://www.activerother.org.uk/wp-content/uploads/2019/01/AR-Sport-and-Physical-Activity-Strategy_V4-Final.pdf - Also recommend including the Active Hastings strategy which has similar focus to the Rother version https://www.hastings.gov.uk/sport_play/strategies/partnership/	
	Section 8 – Heritage	Objective 11 - Historic environment/ townscape is protected, enhanced and made more accessible - We would support approaches to the protection, enhancement and improvements in accessibility to local heritage, as it is acknowledged that this can have a positive impact on individual and community wellbeing, including outcomes such as increased confidence, social connectivity, sense of belonging and collective empowerment.	No action required.

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	Section 9 – Land and Water Quality	Objective 12 - The risk of pollution to land and soils is reduced and quality is improved. Objective 13 - Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced. Objective 14 - The risk of pollution to water is reduced and water quality is improved. Acknowledging the impact of land and water pollution on the health and wellbeing of those affected, we would support considered approaches to reduce the risk of potential occurrence - Acknowledging the impact of land and water pollution on the health and wellbeing of those affected, we would support considered approaches to reduce the risk of potential occurrence.	No action required.
	Section 10 – Natural Landscape	Objective 15 - Ensure that Parks, gardens and countryside are protected, enhanced and made more accessible. We would support connecting health and wellbeing opportunities for local people of all ages (noting the need to provide safeguards for certain groups such as children) that maximises health and wellbeing in a way that is easy to access and free.	These comments are noted by the Council and these will help shape the Local Plan. No change required to the SA.
	Section 11 – Skills, Employment and Economic Development	Objective 16 -Economic performance is improved. Objective 17 - There are high and stable levels of employment and diverse employment opportunities for all. Objective 18 - Levels of poverty and social exclusion are reduced and the deprivation gap is closed in the more deprived areas. Objective 19 - Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve - We acknowledge the link between deprivation, economic growth, education, skills and employment and exclusion and health outcomes. The positive impact that health has on economic growth and poverty reduction, occurs through less worker illness, increased productivity, lower absenteeism rates and improved learning among school children and adults, higher incomes and improved housing accessibility. We therefore support the aspirations set out in these objectives and would wish to further develop our collaborative work with the two councils, established in recent years through the CCG's membership of the two Local Strategic Partnerships, the Hastings Opportunity Area Board and the CHART (Connecting Hastings and Rother Together) Executive Board.	These comments are noted by the Council and these will help shape the Local Plan. No change required to the SA.

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	Section 12 - Transport	Objective 20 - Road congestion levels are reduced and there is less car dependency and greater travel choice - Measures to encourage walking and cycling as part of an approach to develop greater travel choice are important to the health and wellbeing of local people. We would therefore support plans to encourage local people to be more active and use sustainable forms of transport. We would suggest that when considering these travel choice options, it would be helpful to develop these in conjunction with local NHS facilities such as GP practices, other community health facilities and the local hospitals.	These comments are noted by the Council and these will help shape the Local Plan. No change required to the SA.
Marine Management Organisation		No response	N/A
South East Coastal Group		No response	N/A
East Sussex County Council	Whole Document	We have outlined initial officer thoughts and points which have identified a few areas which we believe need to be expanded and updated particularly around climate change, heritage, health and transport. Please note that it has not been possible to go into detail in all areas of the report and appendices in responding to this consultation or to involve all relevant officers. As you can appreciate due to the Covid 19 situation many officers are involved in priority work areas and/or have been redeployed to front line services. We however expect that through future engagement with the Local Plans and supporting evidence documents advice can be provided which will cover all areas of relevance and expertise of the County Council. References should only be made to the East Sussex Environment Strategy 2020. This has updated the previous Environment Strategy adopted in 2011. There have been significant changes to national, regional and local policy and strategies since 2011 therefore it is not appropriate to refer to the earlier strategy. The 2020 Strategy aligns with the latest national, regional and local strategies and identifies the current key challenges, opportunities, aims and actions for the County.	All references to the Environment Strategy in 2011 will be removed. The Council is undertaking early engagement with ESCC on its Local Plan which will outline the timeframes for input from ESCC and how the Council will approach its Duty to Cooperate duties.

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		ESCC officers are happy to engage wherever possible at key stages in the plan making process and in producing evidence documents which are of relevance to the County Council to assist Hastings Borough and Rother District Councils in producing sound Plans. However, resources are limited and it may be necessary at certain times to prioritise other work areas, therefore responses or advice may have to be limited or extensions to deadlines will be requested. We would ask in order to ensure that wherever possible deadlines are made that we are given as much advance notice as possible of consultations. A frequently updated work programme would also be helpful.	
	Section 6 – Climate, Flooding and Coastal Change	The importance of the climate change emergency and the need for it to drive a lot of policy areas is not fully recognised in this report. There should also be recognition in the report regarding the cross-cutting nature of the climate change agenda. It is confusing to where climate change sits in the report and there is no acknowledgement of the overlap between areas and objectives this needs to be clarified. For example, it appears that climate change is covered within the ‘Energy and Water Consumption’ chapter, however the chapter does not fully cover decarbonisation and the links with air quality and transport. ‘Key Issues’ do not cover carbon reduction only gas and water consumption. Climate Change is also referenced in the ‘Climate, Flooding and Coastal Change’ chapter, though most of this chapter including the Key Issues deals only with Flooding and Coastal Change. It is recommended that there is a separate chapter on climate change which recognises the links to other areas and objectives such as air quality, transport and flood risk. Though in the SA Framework Objective 3 on climate change it does reference the need to minimise the need to travel this is not reflected in the report’s chapters. There is no mention of the general policy steer on the valuable role that transport must play in reducing carbon emissions and helping meet climate change goals. There is within national and regional	The cross-cutting nature of climate change agenda can be explained in the introductory paragraphs of the report before introduction to the key themes as it influences all of the objectives, not necessarily just sections 3 and 6 of the report The key issues in Section 3 will be expanded to make reference to decarbonisation and the links to air quality and transport, including the role that transport must play in reducing carbon emissions. SA Objective 3 is directly linked to climate change and this stems from the Energy and Water Consumption chapter.

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		policy a clear direction on the importance of using planning to help reduce the future need to travel particularly by car and the need to increase journeys undertaken by walking, cycling and/or public transport. It is important that these points are made clear in any chapter on climate change. Reference should be made to the East Sussex Local Flood Risk Management Strategy 2016-2026.	Reference to the East Sussex Flood Risk Management Strategy will be added to Section 6.
	SA Framework Indicators	SA Framework: Objective 3 Appraisal questions should be further strengthened and be more proactive on these points, suggested changes are in red text: Will the option/proposal/policy help to... • ~~Promote~~ Lead to efficient land use patterns that minimise the need to travel? • Lead to more sustainable travel including walking, cycling and public transport? • ~~Does it support~~ Enable the take up of low or ultra-low emission vehicles?	The appraisal questions will be amended as suggested.
	Section 7 – Population, Health and Wellbeing	The report refers to out of date plans. It is recommended that the following plans are referenced, and the key points from the documents are covered and incorporated within the key issues and the SA objectives. • Annual Report of the Director of Public Health in East Sussex 2019/20: Health and Housing Report • East Sussex Health and Social Care Plan – April 2020 • Strategic Delivery Plan: Response to the NHS Long Term Plan – 15 November 2019	The first two listed documents will be referenced in this chapter and any impacts on the key issues and objectives will be addressed. The third document was reviewed not considered essential to summarise as the main points had been raised through other reports.
	Section 8 – Heritage	Relevant Plans and Programmes should also mention the Scheduled Monuments and Archaeological Areas Act 1979 https://historicengland.org.uk/advice/hpg/has/scheduledmonuments/ The local data is presented in different ways for Rother and Hastings. Hastings provides actual numbers against various categories and this data could be presented in the same format for Rother for continuity and would link to Appendix 2 table data.	The link to Scheduled Monuments and the Archaeological Areas Act 1979 will be provided. Reference will be made to Winchelsea as a rich source of

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		Information on Hastings includes the figure of 300 for sites, monuments and finds and is additional to the 32 archaeological notification areas (ANAs), the ANA figure of 27 is incorrect. It is not sure how much value these extra numbers/categories add as they are a little bit meaningless unless you know what they all relate to, but they provide a very coarse indication of what is known. If this data is included it should also be presented for Rother. It would be good to name check Winchelsea as much of this town is a Scheduled Monument and is a very rich source of medieval archaeological/architectural data (both above and below ground). The ESCC Historic Environment Records (HERs) should be mentioned as a source of baseline data. The 'Key Issues' focus is on built heritage but should also include below ground assets. In terms of making archaeology more accessible, community engagement is to be encouraged during planning-led commercial archaeological investigations (i.e. site open days, talks to local societies etc). This is already part of the planning requirements for sites of particular interest and is written into the Sussex Archaeological Standards which archaeological contractors abide by. Paragraph 147 should include the potential for development to also impact on below ground heritage assets both known and as yet unknown. The SA objective is rather simplistic and difficult to apply to below ground heritage assets which cannot be protected/enhanced/made more accessible in the same way (or at all) when compared with built heritage. It would be good to see a statement that allows for prior investigation/assessment of below ground heritage assets (known & unknown) and 'preservation by record' where identified archaeological remains will be unavoidably impacted by development. The HER could also be mentioned here too.	archaeology along with the Historic Environment Records Data. The Council will confirm the correct number of ANAs in Hastings and will try to ensure there is consistency in this section in relation to the data presented for each Local authority. The key Issues section will be amended to confirm that the historic environment includes built heritage and archaeology (below ground). Para 147 will be amended to mention below ground heritage. An additional SA question has been included to reflect that archaeological resources will be considered. The SA objectives have deliberately been developed to be made as simple to understand and apply as part of the SA framework. It is considered that the 'protected' element of the objective would allow for below ground heritage to be considered appropriately and preservation through

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			planning applications to be applied.
	SA Framework Indicators	The SA Framework Appraisal questions should also cover archaeology it is suggested that it includes: Will the option/proposal/policy help to... identify sites of archaeological potential through consultation of the HER/desk-based impact assessment/fieldwork. Appendix 2 Indicator tables – The following provides additions and updates to the table. ANAs based on current ESCC HER data (04/06/2020): - o Rother = 518 - o Hastings = 32 Scheduled Monuments - o Rother = 39 - o Hastings = 6 Registered Parks & Gardens - o Rother = 7 - o Hastings = 2 (plus we have records for 4 locally listed assets – Bohemia Estate, Linton Gardens, White Rock Gardens/Pleasure Grounds & Wellington Gardens Registered Battlefields - o Rother = 0 - o Hastings = 1	The additional appraisal question to cover archaeology will be added as discussed above. The indicator tables have been updated to include the latest data from Historic England, which was for 2018/19, as this is publicly available and updated annually. This indicator is shared with the AMR. In addition, the ANA figure for Rother (518) that is stated is not consistent with the data we have received.
	Section 12 - Transport	There needs to be more focus on the principles and objectives coming out of Transport for South East (TfSE) Transport Strategy which provides the direction for transport policy and planning in this region. It highlights that land use planning and transport planning must become more closely integrated. It focuses on the importance of more planning for people and more planning for places over the life of the strategy to 2050. Reference needs to be made to the emerging Local Cycling and Walking Infrastructure Plan (LCWIP). This sets out the current direction of work in this area and will be ensuring a consistent approach across the County. It is therefore important that the LCWIP and subsequent versions, as it will be a living document, is used to inform Local Plans and their policies.	Paragraph 220 which discusses the TfSE Transport Strategy will be further developed to draw out the points raised. Reference will be added to the emerging Local Cycling and Walking Infrastructure Plan (LCWIP). The Council can consider the implications of LTP4 as it is

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		Please note that work is starting on Local Transport Plan 4 which will build on the key messages and direction coming out of TfSE Transport Strategy and the LCWIP. It will be essential that Local Plans and the Local Transport Plan are developed together to ensure a consistent and integrated approach to common objectives around climate change, air quality, health, accessibility, connectivity and place shaping.	developed alongside the Rother Local Plan.
	SA Framework Indicators	Objective 20 Appraisal questions should be further strengthened and be more proactive, suggested changes are in red text: Will the option/proposal/policy help to... • ~~Promote~~ Enable more sustainable transport patterns including walking, cycling and public transport? • Reduce the need to travel by car through: the location and design of new development, and places which provide more opportunities for active travel, and for the provision and link to public transport infrastructure?	The appraisal questions will be amended as proposed.
Wealden District Council	Whole Document	The Council has no specific comments to make on the report. We note that the SA identifies some cross boundary strategic issues. We would be happy to take these forward as part of the Duty to Cooperate process and to address them in the formulation of a Statement of Common Ground. We would like to meet shortly to start this process in relation to both Rother's Local Plan Review but also in relation to our Local Plan, of which we are also in the early stages in preparation. We will be in contact shortly with some potential dates for a meeting.	RDC has prepared a Duty to Cooperate Action Plan, outlining the stages in which WDC will be engaged in plan making. Consultation was undertaken on this from August-October 2020. RDC are committed to working with Wealden DC on our respective Local Plans
Tunbridge Wells District Council	Whole Document	Not a strict requirement for Scoping Report but, as is often the case with such a broad topic mater, the report is lengthy and would benefit from Non-Technical Summary that briefly explains the process, key findings and outcomes. You'll be aware from Duty to Cooperate meetings, that TWBC is planning development at Hawkhurst that is likely to impact upon Flimwell and the A21 junction. In addition, a cross	The Council does not intend to produce a non-technical summary at this stage, but will produce one for the SA reports when published for wider public consultation.

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		county bus service between Hawkhurst and Etchingham train station has been discussed in the past.	Comments are noted with regards to transport infrastructure impacts for the emerging Rother District Local Plan.
	Approach to SA Scoping	Para 13. It would be worth mentioning the provision for net gains in this paragraph as it is such a significant part of the new bill.	Reference to Biodiversity net gain will be added in to the report.
	Section 3 – Air Quality	Para 20. Biodiversity 2020: A strategy for England’s Wildlife and Ecosystem Services could be added under National Policies and Plans.	Reference to this report will be added.
	Section 4 - Biodiversity	Page 23. Do you have any local or regional declarations of biodiversity emergency to include?	This is not relevant to Rother or Hasting’s Councils.
	Section 5 – Energy and Water Consumption	The significant amendment to this Act in 2019 changing the 2050 target from 80% to 100% (i.e. net zero) needs to be mentioned. You have chosen to separate climate change mitigation and adaptation into different chapters. For this reason, Para 80 is not relevant to energy consumption. If you continue with this structure, these aspects should be included in para 96 only. Page 36. It would be worth mentioning the East Sussex Climate Emergency declaration and targets. Para 86. This paragraph needs updating to reflect Hastings recent 2020 strategy to ensure it is consistent with para 106.	Paragraph 79 will be amended to state the amendment to the UK Climate Change Act in 2019. For clarity it would be appropriate to move paragraph 80 to be included as part of paragraph 96. Paragraph 86 will be amended to ensure it is consistent with para. 106.
	Section 6 – Climate, Flooding and Coastal Change	Para 107. No context is provided for the list. Presumably, these are actions on the 2 year action plan? In addition, none of these actions relate to climate change adaptation (the topic for this chapter). It be more logical to list these actions in relation to Chapter 5 (Energy Consumption). Para 107. The longer term action plan will be most relevant to the new Local Plans.	Para 107 will be amended to make clear that these are action points in relation to the 2 year plan. It is considered that there is cross-over between the two

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		Para 114. Many environmental bodies would recommend highlighting climate change adaptation as a key issue for local plans. You have considered flood risk and coastal erosion but there is also the impact that rising temperatures and overheating will have on human health and wellbeing.	chapters and that this is relevant to both chapters. Climate change is addressed as part of sustainability objectives identified at para 93. It therefore does not need to be repeated.
	Section 9 – Land and Water Quality	Page 69. Waste generation is being discussed in the Pollution chapter but the specific monitoring data and resultant objective is a resource and consumption issue, rather than an pollution issue per se. It might be better placed in Chapter 5 which could be renamed ‘Resource Consumption’?	Waste generation is part of the land and water quality which does include consumption factors that affect the quality of land and water. No change required.
	Section 12 - Transport	It might be useful to distinguish between sustainable and active travel to demonstrate clearly that consideration is being given to more than public transport.	It is considered that this is not required.
	SA Framework Indicators	Number 3 should refer to regional and local carbon neutrality targets too as these are more ambitious than the national targets. Number 3. None of these appraisal questions relate to climate change adaptation as the SA objective suggests. See comments above about incorporating a consideration of climate change adaptation that goes beyond flood risk. All questions relate to reducing emissions i.e. climate change mitigation. Number 10. It could be worth distinguishing between active and sustainable travel? Page 13. The conflict between objective 4 (water consumption) and meeting housing need should be highlighted as red and described in the text. Page 13. As this report will go onto your website, Accessibility Standards which come into effect in September 2020 will need to be considered. The red and green colours in this table could be problematic. This will also be an important consideration later down the line, when you consider how to illustrate scores for the SA itself.	SA appraisal questions have been reviewed in the round to ensure they are appropriate. Climate change is a cross cutting theme and will be relevant to most SA objectives The conflicts between SA objectives will be addressed before the final SA report is published, including the impacts for accessibility standards.

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	Appendices 2,3 and 4	Very useful summary tables. As this report will go onto your website, accessibility standards will need to be considered. The red and green colours in the tables could be problematic. On some pages, the text size is too small if printed at A4. Seek advice from your digital services team or equivalent.	Accessibility standards will be assessed before the final SA report is published publically.
Ashford Borough Council	Whole Document	The Borough Council has no comments to make on the Scoping Report and believes it forms a sound basis for taking forward the SA/SEA. The Borough Council would like to take this opportunity to draw your attention to the SOCG that was agreed between ABC and RDC in November 2017 at the time of the Ashford Local Plan Examination – copy attached for your information. In particular I would draw your attention to the section headed Future Collaboration and paragraphs 8, 9 and 10 of the document. Clearly, as drafted the SoCG related to the Rother Core Strategy (Local Plan) only, but may be equally relevant to the Hastings Local Plan. The SOCG clearly indicates the desire to collaborate closely when our respective Local Plans are taken forward and on that basis I would like to suggest a meeting to discuss matters of mutual interest, involving Hasting BC if you deem that appropriate. I would also like to highlight the infrastructure matters shown in paragraph 10 of the SOCG that are still relevant.	These comments will be taken into account in order to inform the preparation of the Rother District Local Plan.
Folkestone & Hythe District Council	Section 4 - Biodiversity	The only comment I would make on behalf of Folkestone and Hythe District Council is to suggest reference is made in the Biodiversity chapter to the Dungeness Sustainable Access and Recreational Management Strategy (2017). The SARMS was prepared following the commitment from both Folkestone & Hythe and Rother District Councils. The need was identified in both Councils' Local Plan Core Strategies and supporting Habitats Regulations Assessments (HRA), which raised concerns of possible additional pressure and disturbance on the internationally important wildlife sites caused by increased recreational activities as a result of the councils' planning policies. For the overall strategy area, it was found that there was a degree of disconnect between the tourism and natural environment sectors. Raising the profile of the nature conservation value of the strategy area, through a focused partnership working towards a shared agenda, should benefit the visitor economy and move it in a more environmentally-	The SARMS will be referenced in the Biodiversity Chapter as this will be brought forward as an important consideration for the Local Plan.

Consultee	Section/Area of Report	Summary of Response/Comments	Action/Response to the Scoping Report
		aware and sustainable direction, which could prove mutually beneficial. The Strategy also sets out measures needed to mitigate the relevant impacts.	

