



Rother District Local Plan 2020 - 2040

Sustainability Appraisal

Interim Report

In support of the Draft (Regulation 18) Version - April 2024

www.rother.gov.uk

This information can be made available in large print, audio or in another language upon request.

Please telephone **01424 787668** or email
DraftLocalPlan@rother.gov.uk

Contents

NON-TECHNICAL SUMMARY	7
Introduction to Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)	7
The New Rother Local Plan (2020-2040)	7
The Sustainability Appraisal (SA) of the Local Plan.....	8
Outcomes of the Sustainability Appraisal (SA) process.....	8
Statement on the difference the SA process has made	15
Outcome of the Health Impact Assessment Process.....	16
How to Comment on the Interim SA Report	16
1. CONTEXT.....	17
1.1 Introduction	17
1.2 The Rother Local Plan (2020-2040)	17
Role and Context.....	17
Programme and Consultation.....	18
1.3 Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)	18
1.4 The SA Stages and Process as applied to the Local Plan	19
1.5 Compliance with SEA Directive/Regulations.....	22
2. SUSTAINABILITY BACKGROUND	26
2.1 Links to Other Strategies, Plans, Policies, Programmes and Sustainability Objectives	26
2.2 Key International Plans, Policies and Programmes.....	27
2.3 Key National Plans, Policies and Programmes	27
The National Planning Policy Framework (2023).....	27
The Planning Practice Guidance (PPG).....	29
Further Consideration of the Implications of Key New and/or Altered National Strategies, Plans, Policies, Programmes and Sustainability Objectives	29
Affordable Housing Provision	30
2.4 Key Local Plans, Policies and Programmes	30

International (Natura 2000) Sites and Environmental Designations.....	30
Habitats Regulations Assessment	31
Community Infrastructure Levy (CIL)	32
Infrastructure Delivery Plan (IDP)	33
3. SUSTAINABILITY ISSUES	34
3.1 Environment.....	35
Waste & Recycling (Sustainability Appraisal Framework (SAF) Objectives 13)	35
Landscape Quality (SAF Objective 15)	36
Biodiversity (SAF Objective 2)	36
Built Environment (SAF Objective 11)	37
Climate Change (SAF Objectives 5, 6)	37
Water Quality (SAF Objective 14).....	38
Air Quality (SAF Objective 1)	38
3.2 Social	39
Community Safety (SAF Objective 10)	39
Children & Young People (SAF Objectives 9)	39
Culture & Leisure (SAF Objective 9).....	39
Health and Well-being (SAF Objective 7)	40
Housing (SAF Objective 8).....	40
Transport & Accessibility (SAF Objectives 9, 20).....	41
Deprivation (SAF Objective 18).....	41
3.3 Economic	42
Education & Skills (SAF Objectives 19)	42
Jobs (SAF Objective 17).....	42
Local Economy & Regeneration (SAF Objective 16, 19).....	42
4. APPRAISAL METHODOLOGY	44
4.1 The SA Framework	44
4.2 Compatibility of SA Objectives	48
Objective 8: More opportunities are provided for everyone to in a suitable home to meet their needs.....	50

4.3	Assessment Scoring.....	51
4.4	The SA for the Development Strategy, Potential Sites, Proposed Policies and Alternatives	52
	Development Sites and Boundaries.....	56
	Health Impact Assessment.....	57
5.	APPRAISAL RESULTS AND OUTCOMES.....	59
5.1	Assessment of Options and Policies.....	59
5.2	Development Strategy.....	61
	Combination of Options to take forward as the Council’s proposed development strategy:	65
	Assessment of Sites to form part of the Development Strategy	66
5.3	Sub-Area Visions and Distribution of Development	87
	Summary of SA of Sub-Area Visions and Development.....	89
	Sites for Gypsies, Travellers and Travelling Showpeople.....	89
	Health Impact Assessment of Development Strategy (including Gypsies, Travellers and Travelling Showpeople	92
5.4	Green to the Core	93
5.5	Live Well Locally	99
5.6	Development Principles.....	105
5.7	Health and Wellbeing.....	110
5.8	Infrastructure	117
5.9	Housing	122
5.10	Economy	154
5.11	Landscape Character.....	169
5.12	Environmental Management	173
5.13	Heritage.....	179
6.	SUMMARY OF SUSTAINABILITY AND HEALTH AND WELLBEING IMPACTS.....	183
6.1	Summary of Likely Significant Effects of Proposed Planning Policies and Alternatives against the SA Objectives.....	183
6.2	Cumulative and Synergistic Effects	191

Cumulative Effects.....	191
Synergistic Effects.....	192
6.3 Ways of Mitigating Adverse Effects and Maximising Beneficial Effects.....	193
The Scope and Role of Mitigation	193
Mitigating DaSA Policies	194
Other Statutory Documents	194
6.4 Relationship to the HELAA, the site assessment process and future site allocations	195
6.5 Summary of Health and Wellbeing Impacts.....	196
7. CONSULTATION AND MONITORING	197
7.1 Consultation.....	197
The Statutory Environmental Bodies (SEBs).....	197
Consultation on the Local Plan SA Scoping Report.....	197
Consulting on the Interim SA for the Local Plan	198
7.2 Monitoring.....	198

Appendices

Appendix 1: Links to Other Policies, Plans and Programmes

Appendix 2: Detailed Assessment of Policies

NON-TECHNICAL SUMMARY

Introduction to Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)

- 1 The purpose of Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) is to help planning authorities contribute to achieving sustainable development in preparing their plans. ‘Sustainable development’ aims to integrate the need to stimulate economic growth, to deliver the needs of all sectors of society, and to conserve and enhance the local environment.
- 2 SEA involves examining certain plans and programmes primarily for significant environmental effects. SA widens the approach to include social and economic as well as environmental issues. Local Planning Authority (LPA) plans must undergo both the process of SA and SEA as a result of legislative changes enacted in the UK in summer 2004.
- 3 The combined process reviews plans against a set of criteria reflecting local problems and the LPA’s objectives in delivering sustainable development and addressing these problems.

The New Rother Local Plan (2020-2040)

- 4 The new Rother Local Plan (for the planning period 2020-2040) once adopted will replace the saved policies in the Core Strategy (adopted 2014) and the Development and Site Allocations Local Plan (adopted in 2019). The new Local Plan will contain both strategic and non-strategic policies which will guide development in the district. The Regulation 18 version of the Local Plan which is subject to public consultation in Spring 2024 will contain proposed draft policies as well as potential development sites that could be brought forward all allocated sites in next version of the Local Plan. The next version of the Local Plan (proposed to be Regulation 19 version) will also review development boundaries, along with confirming the proposed policies to be submitted at the examination stage.

The Sustainability Appraisal (SA) of the Local Plan

- 5 This interim report forms part of the overall Sustainability Appraisal (SA) of the new Local Plan. It represents the combined output of the SA and SEA processes and hereafter is called the Local Plan interim SA.
- 6 The stages of the Local Plan SA preceding this report culminated in the publication of a Local Plan SA Scoping Report. The Scoping Report established a new SA Framework for assessment, including decision-aiding questions and indicators. The Local Plan SA Scoping Report also documents the results of the gathering of evidence concerning the current social, economic and environmental conditions in the district. The Local Plan SA Scoping Report identified key sustainability issues or likely future problems by looking at statistical trends and comparing the performance of the District with East Sussex as a whole, the South-East and England. These processes have been continued in this report.
- 7 This version of the Local Plan SA is an ‘Interim Report’ and is published alongside the Local Plan Regulation 18 version, the first public consultation stage of the Local Plan¹.

Outcomes of the Sustainability Appraisal (SA) process

- 8 The outcome of the preliminary ‘Scoping’ stage of the Local Plan SA process was a revised SA Framework, comprising a set of 20 Sustainability Objectives, supported by appraisal questions. The scoping Report was produced in close liaison with statutory environmental agencies (Natural England, the Environment Agency and Historic England).
- 9 Figure 1 below summarises the assessment of the potentially significant effects of the Plan Policies on the SA Objectives. The SA Objectives are in bold and italics. The Plan Policies and the detailed appraisal of them can be found in Appendix B.

Figure 1 : Summary of the Likely Significant Effects of the Local Plan on the SA Objectives

1	<i>Reduce air pollution from transport and development and improve air quality</i> Overall, the significant effects on this SA Objective are neutral.
----------	---

¹ In accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

	<p>Whilst the intentions of the draft Local plan policies within the ‘Green to the Core’ and ‘Live Well Locally’ chapters are to promote sustainable transport alternatives and respond positively to climate change, it is inevitable that air pollution will increase due to new development (construction and occupation) and resulting traffic movements. Over time the impacts of this growth can be reduced through a modal shift in transport use to active and sustainable travel, as well as improvements being made to reduce air pollution through construction. The long-term intentions of proposed policies in the plan on climate change through ‘Green to the Core’ and ‘Live Well Locally’ will help reduce the air pollution impacts, but will not eradicate or necessarily improve air quality.</p>
2	<p><i>Biodiversity is protected, conserved and enhanced.</i></p> <p>Overall, the significant effects of the plan on the biodiversity objective are positive.</p> <p>The positive effects stem from a number of new policies that help deliver the ‘Green to the Core’ ambitions of the Plan, including biodiversity net gain. Green infrastructure improvements will be promoted through the proposed environmental policies and important designated areas for their ecology and wildlife will be protected and effectively managed. There are clear opportunities for biodiversity net gain firstly on proposed development sites, with off-site delivery on identified appropriate sites including Local Wildlife Sites and other local designations, to ensure long-term management and effective retention of important biodiversity.</p>
3	<p><i>The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation)</i></p> <p>Overall, the significant effects of the plan on this objective are positive.</p> <p>The Local Plan seeks to positively address the causes of climate change and respond to its impacts. The suite of climate change policies within the ‘Green to the Core’ section of the plan helps to deliver these to enable a contribution to the radical reduction of carbon emissions from residents and industry across the district and nationally. The Council is being bold and ambitious in its approach to climate change through its draft policy. But recognises that retrospective changes cannot be delivered through planning as they are outside planning policy controls. The Council’s Climate Strategy 2023 states that Rother will use its powers and influence to make the district climate-resilient, and reduce emissions to net zero, by 2030. There is further opportunity to support local and small-scale interventions within local communities, and policies throughout the plan along with the neighbourhood planning process would support this</p>
4	<p><i>Minimise water consumption.</i></p> <p>Overall, the significant effects of this plan on this objective are positive.</p>

	<p>Proposed policies on water consumption would require an optional higher housing standard for water efficiency. This is however difficult to control solely through planning policy and relies on other outside interventions from water companies to support methods and infrastructure to reduce water consumption.</p>
5	<p><i>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.</i></p> <p>Overall, the significant effects of the plan on this objective are positive.</p> <p>Through the Council's development strategy and considering appropriate locations for development, it has been critical to look outside areas of the highest flood risk for all sources of flooding. This follows the sequential approach to locating development in line with national policy guidance. The Council is proposing stronger policies in the Local Plan in relation to coastal management through the development of an identified Coastal Change Management Area, along with stronger policies on sustainable drainage, especially in environmentally sensitive areas. With regards to climate change impacts the 'Green to the Core' chapter of the plan makes a step change in policy to respond to the climate emergency and highlights this as a key priority. The Council's Draft Housing and Employment Land Availability Assessment (HELAA) has assessed flood risk as part of the suitability of sites. Future site allocations in the next version of the plan will take a sequential approach in site identification to ensure sites outside of flood risk are considered first.</p>
6	<p><i>The risk of coastal erosion is managed and reduced, now and in the future.</i></p> <p>Overall, the significant effects of the plan on this objective are positive.</p> <p>As stated above, the Council is proposing stronger policies in the Local Plan in relation to coastal management through the development of an identified Coastal Change Management Area (CCMA), in line with national policy requirements. The proposed policy approach identifies the area of Fairlight as requiring protection as this area of the coast is not protected through 'hold the line' in the Shoreline Management Plans. The Council is gathering an enhanced evidence base on coastal erosion through development of new Shoreline Management Plans and the map-based visualisation tool called MSP-Explorer which makes data more accessible. The CCMA will mean that certain types of development will not be allowed within the designated zone and existing residential uses will be supported for relocation. For other areas of the district, ongoing coastal protection will be maintained in line with the Shoreline Management Plans, and supportive policies are promoted through the environmental management policies of the Local Plan.</p>
7	<p><i>The health and well-being of the population is improved and inequalities in health are reduced.</i></p> <p>Overall, the significant effects of the plan on this objective are strongly positive.</p>

	<p>Health and well-being is an important golden thread that runs throughout the Local Plan, being a key consideration in the development of planning policies. Informal engagement has taken place with East Sussex Public Health to help shape the policies and link to wider public health benefits. The development of new policies such as requiring Health Impact Assessments on the appropriate scale of development, and undertaking a HIA as part of the whole SA/SEA process of the Local Plan means that this objective is strongly delivered. Whilst the overall health of local residents will be improved through the development of 'green to the core' and 'live well locally' policies, there is also specific focus on areas of deprivation and where wider determinants indicate that health and wellbeing issues are more pronounced.</p>
<p>8</p>	<p><i>More opportunities are provided for everyone to in a suitable home to meet their needs.</i></p> <p>Overall, the significant effects of the plan on this objective are positive.</p> <p>The delivery of all types of housing to meet local need is a key priority of the Local Plan. The need for affordable housing is significantly high, above that which the Council has been able to deliver in overall housing numbers over the past few years. The Plan seeks to strike an appropriate balance between ensuring overall development viability and delivering affordable housing where it is required. In order to maximise supply, the Local Plan is supported by a comprehensive assessment of approximately 1000 sites as part of the HELAA process. This results in a list of sites that are developable or have potential subject to further testing and considerations. This potential will be further explored and confirmed as the Local Plan progresses. The proposed policies in the housing chapter support an appropriate size, design and standard of development to ensure that everyone has a suitable home that is sustainable, capable of adaptation, and therefore suitable for their lifetime.</p>
<p>9</p>	<p><i>All sectors of the community have improved accessibility to services, facilities, jobs, and social and cultural opportunities.</i></p> <p>Overall, the significant effects of the plan on this objective are positive.</p> <p>The Council seeks to ensure through its 'live well locally' and development strategy policies that development is located in sustainable locations with good access to services and facilities. Whilst there are several existing dwellings in isolated countryside location, the development strategy seeks to focus development in five core sub-areas which are focused across key transport hubs and provide various levels of sustainable travel alternatives. Some facilities and services will need to be accessed in neighbouring settlements, and there will be a certain level of dependency on the car, but proposed policies will support the improvement in cycling, walking and wheeling provision which will make all services more accessible. Main town centre uses (including leisure and culture) will</p>

	<p>be supported in the designated town centre areas which will be accessible by public transport. There are also opportunities for residents to access facilities and services outside of the District in nearby towns and villages in neighbouring authorities.</p>
10	<p><i>Safe and secure environments are created and there is a reduction in crime and fear of crime.</i></p> <p>Overall, the significant effects of the plan on this objective are positive.</p> <p>The ‘Live Well Locally’ chapter includes proposed policies on Built Form and Streets for All as well as the Health and Wellbeing chapter policies which support safe and secure environments. The Local Plan promotes creating well designed new development which will improve safety and reduce crime and the fear of crime.</p>
11	<p><i>Historic environment/ townscape is protected, enhanced and made more accessible.</i></p> <p>Overall, the significant effects of the plan on this objective are positive.</p> <p>Proposed Heritage policies are identified as having positive effects on townscape and built environment. Proposed policies HER1-3 have a notably positive effect on the built landscape and heritage management, with landscape character and the High Weald National Landscape represented significantly in the Green to the Core and Landscape Character chapter policies.</p> <p>Although many potential development sites indicated in the development strategy are greenfield sites within the High Weald itself. This is because sites have been rigorously assessed to avoid negative landscape impacts as far as possible, including negative impacts on key features of the High Weald. In any future allocation of sites, positive treatments will include landscaping to enhance the immediate environment.</p>
12	<p><i>The risk of pollution to land and soils is reduced and quality is improved.</i></p> <p>Overall, the significant effects of the plan on this objective are positive.</p> <p>The Local Plan proposes strong detailed policies in relation to environmental pollution (ENV7) and Land Stability (ENV3). The policies will ensure that development will have no adverse impact on health, local amenities, biodiversity and environmental character as a result of considering a full range of environmental pollutants. Environmental pollution issues will vary depending on the location and type of development involved, but in all cases it is important to consider the full effects of the proposals</p>
13	<p><i>Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced.</i></p>

	<p>Overall, the significant effects of the plan on this objective are neutral.</p> <p>The Local Plan proposes specific policies to support the minimisation of waste, for example Policy GTC3 Construction materials and waste. The Local Plan seeks to ensure that the sustainability of development includes the construction phase, and that development proposals look to reuse land and buildings wherever feasible, reuse and recycle materials, implement appropriate design methods and ensure appropriately designed space is provided for recycling of domestic waste. Whilst this is a positive measure it is challenging to ensure overall that waste production is reduced.</p> <p>There are two household waste recycling facilities within the District – at Mountfield (on the A21 north of Battle) and at Pebsham (Between Bexhill and Hastings). It is difficult for all potential development locations to be truly accessible to these two sites, although to a secondary extent they may be accessible to the more numerous smaller ‘bring’ recycling sites. The overall effects are therefore considered to be neutral.</p>
14	<p><i>The risk of pollution to water is reduced and water quality is improved</i></p> <p>Overall, the significant effects of the plan on this objective are positive.</p> <p>Ensuring that robust and resilient water supplies and wastewater infrastructure is in place is both essential to the district’s residents and businesses, and critical to support growth. There are many challenges in place. These include safeguarding water sources from the threat of pollution, reducing usage, and meeting the challenge of climate change.</p> <p>The Local Plan’s proposed policies are strengthened and ensure that all forms of pollution are taken account of, especially in policy ENV7 Environmental pollution. The importance of water management and water quality is clearly reflected in policies ENV2 and 3, and therefore the overall effects are positive.</p>
15	<p><i>Ensure that Parks, gardens and countryside are protected, enhanced and made more accessible</i></p> <p>Overall, the significant effects of the plan on this objective are positive.</p> <p>The Local Plan consolidates the protection, enhancement and provision of all green and blue infrastructure in proposed Policy HWB5. The policy helps plays a key role in boosting the vitality of communities and has a direct positive impact on physical and mental health together with overall wellbeing. The policy helps establish a network of natural spaces for biodiversity and environmental benefits which link to other Green to the Core and landscape character policies within the Local Plan. Proposed Policy LAN1 Rural Environments and Landscape Character provides protection for areas of high landscape value across the rural areas of the district.</p>

<p>16</p>	<p><i>Economic performance is improved</i></p> <p>Overall, the significant effects of the plan on this objective are positive.</p> <p>The Local Plan sets a target of employment floorspace to be delivered by 2040, which is evidenced in the Council’s Housing and Economic Development Needs Assessment (HEDNA). The Plan has a potential supply which is higher than this need, which allows flexibility for changing circumstances on sites and allows strategic choices of site allocations for the next version of the Local Plan. A series of policies in the economy chapter of the Local Plan promote the development and retention of employment uses across the district. Such policies allow further economic development in key areas of the district such as town centres, within development boundaries and in appropriate locations in the countryside. The strengthened policies are considered to allow economic performance to thrive and as such the policies provide a positive effect on this objective.</p>
<p>17</p>	<p><i>There are high and stable levels of employment and diverse employment opportunities for all</i></p> <p>Overall, the significant effects of the plan on this objective are positive.</p> <p>The assessment is similar to Objective 16. The Local Plan’s economy chapter contains strengthened proposed policies to protect and retain existing employment sites and sites of social or economic value. There is specific policy support to support Local Employment and Skills. The HEDNA concludes that the lack of local skills particularly in the construction sector plays a role in restricting the development of the housing and other uses, and the upskilling of local residents is therefore a key objective of the Local Plan. The Council responds to this by setting a clear policy which seeks developer contributions from qualifying developments to implement and monitor Local Employment and Skills training, working in partnership with the Council’s regeneration team. The live well Locally policies in combination with the economy policies in the Local Plan are considered to have a positive effect on this objective.</p>
<p>18</p>	<p><i>Levels of poverty and social exclusion are reduced, and the deprivation gap is closed in the more deprived areas.</i></p> <p>Overall, the significant effects of the plan on this objective are positive.</p> <p>The proposed policies in the Live Well Locally and Health and Wellbeing policy, together will have a positive impact on this objective. The Council has identified the 4 wards of the district which are within the 20% most deprived wards nationally, and this ensures that qualifying developments respond to identified impacts through in a Health Impact Assessment. The support for retention and protection of sites of community and economic value as well as designing out crime are important considerations referenced in policies of the Local Plan. There are important considerations within Building for Healthy</p>

	Lives, which are referenced in Live Well Locally policies LWL5 Distinctive Places and LW6 Built Form.
19	<p><i>Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve</i></p> <p>Overall, the significant effects of the plan on this objective are positive.</p> <p>The assessment is similar to Objective 16 and 17. The Council responds to this by setting a clear policy which seeks developer contributions from qualifying developments to implement and monitor Local Employment and Skills training, working in partnership with the Council's regeneration team. The live well Locally policies in combination with the economy policies in the Local Plan are considered to have a positive effect on this objective. A series of policies in the economy chapter of the Local Plan promote the development and retention of employment uses across the district. Such policies allow further economic development in key areas of the district such as town centres, within development boundaries and in appropriate locations in the countryside. The strengthened policies are considered to allow economic performance to thrive and as such the policies provide a positive effect on this objective.</p>
20	<p><i>Road congestion levels are reduced and there is less car dependency and greater travel choice.</i></p> <p>Overall, the significant effects of the plan on this objective are neutral.</p> <p>The intention of policies in the Local Plan through Live Well Locally is that sustainable alternative forms of travel are provided locally and that people are able to lead their lives in a sustainable local way. In it inevitable that car usage will still take place for longer journeys including commuting to work and for activity based travel. Through the delivery of essential transport infrastructure to support development proposed in the plan (to be confirmed at the next stage of the Local Plan), road congestion levels should be alleviated, with more sustainable forms of travel provided at a local level where feasible and in support of larger major development sites in locations within towns and villages. The significant effects of the plan on this are currently unknown in detail and as such currently this is assessed as neutral, to be reviewed at the next stage of the Local Plan.</p>

Statement on the difference the SA process has made

- 10 The SA process has been a fundamental tool in the development of the Local Plan, being an intrinsic part of the development of planning policies through the background papers. The SA has provided evidence to inform decision making and helped with developing options for different policy themes. This is clearly evidenced in each of the background papers and forms an important audit trail of

how planning policy options were assessed and proposed policies prepared. The process has been crucial in helping the Council assess any changes to the wording of the policies as they develop. The SA process acts as a key mechanism to highlight any possible negative effects and ensure that where possible the policies include mitigation of these effects. The SA process will continue to shape policy development and site allocations at the next stage of the Local Plan.

Outcome of the Health Impact Assessment Process

- 11 The Council have integrated into the SA report the important process of assessing proposed policy against a set of health and wellbeing criteria. The integration is considered to be mutually beneficial as the SA process has identified where there are health and wellbeing issues, which have then been further elaborated and explored through a distinct set of Health Impact Assessment criteria. The Council have engaged directly with East Sussex County Council's Healthy Places team in the development of specific policies in the Local Plan such as the Live Well locally, development strategy and Health and Wellbeing chapter as well as developing a clear assessment matrix for the HIA to test proposed policies in the Local Plan. This process has demonstrated that whilst there were specific health and wellbeing impacts recorded, these were largely positive impacts which could be amplified by other supporting policies in the Local Plan. The summary tables for HIA after each policy area show that the Council considers that no changes are required to the proposed policy at this stage to address health and wellbeing, which reflects strong collaboration and the strength of policies to support overarching health and wellbeing objectives for the Local Plan.

How to Comment on the Interim SA Report

- 12 Persons and/or organisations will be able to comment on this Interim SA report directly, including statements of objection or support, via the consultation on the overarching Local Plan. Please specifically reference the SA and any chapter headings, section titles or paragraph and figure numbers when making any representations.
- 13 Please refer to the Councils' web-site for details [Draft Local Plan](#) which will also include access to other supporting evidence base documents..

1. CONTEXT

1.1 Introduction

1.1.1 The Council is required by law to produce a Sustainability Appraisal (SA) (incorporating Strategic Environmental Assessment (SEA)) for its Local Plan. This is the Sustainability Appraisal of the Rother Local Plan (2020-2040) Local Plan. The SA also integrates the Council's Health Impact Assessment, which assists in integrating an assessment of specific health impacts to the wider SA process. The Council has engaged and worked collaboratively with East Sussex County Council's Health Places Team

1.2 The Rother Local Plan (2020-2040)

1.2.2 The Rother Local Plan (2020-2040) is a full update of the existing Local Plan and will replace the Core Strategy Local Plan (adopted in 2014), the Development and Site Local Plan (adopted in 2019) along with saved policies of the 2006 Rother Local Plan.

Role and Context

1.2.3 The Local Plan presents the vision for the district, the key strategic objectives, the dual priorities of Green to the Core and Live Well locally along with the strategic and non-strategic policies required to support growth. Another key part of the plan is the proposed development strategy which identifies the amount of residential and employment growth that is proposed for the plan period to 2040. The Local Plan is at the Regulation 18 stage which is the first formal consultation stage. The Council has prepared proposed policies under each chapter and theme in order to receive more structured and detailed feedback through the public consultation. The role of the SA and the background papers which support the Local Plan are to present the reasonable policy alternatives under each key issue. It is therefore important that the SA and background papers are read in conjunction with the proposed policies in the Local Plan.

1.2.4 The Local Plan does not at this stage present proposed sites for development allocations. The development strategy section of the Local Plan presents sites which have planning permission and are currently allocated for development and can therefore if appropriate be brought forward as 'identified sites'. Therefore

through the HELAA process existing site allocations and commitments have been reviewed along with all other sites with potential that have been submitted to the Council or have been identified through previous studies and officers. This adds some 'potential additional' sites for consideration and feedback through the consultation. The Local Plan identifies an overall housing supply on additional potential sites, with information on the locations of these sites and their relevant quantum of development in the supporting Draft HELAA. Further work will be undertaken after the Regulation 18 consultation stage to assess which of the potential sites should be progressed to allocation and to provide the detailed quantum of development and policy wording for the next stage of the Local Plan.

- 1.2.5 The next stage of the Local Plan will also look to develop the current policies on specific topic areas such as affordable housing through setting a specific percentage for different areas of the District supported by viability evidence.
- 1.2.6 The Council is using the Regulation 18 stage as a key opportunity to propose new and aspiration policies in relation to matters such as responding to climate change and biodiversity. Whilst a full viability assessment of the plan has not yet been undertaken, it will be beneficial to seek the views through the public consultation on the proposed policies, which are all informed by the Council's detailed evidence base that has been developed as the Local Plan has progressed.

Programme and Consultation

- 1.2.7 The programme for the production of the next stages of the Local Plan is set out in the Council's new Local Development Scheme (LDS) which was published in February 2024. This version of the Local Plan Sustainability Appraisal is published to support the Regulation 18 Local Plan² which will undergo public consultation in line with the Statement of Community Involvement (SCI) in Spring 2024.

1.3 Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)

- 1.3.1 A sustainability appraisal is a systematic process that must be carried out during the preparation of a Local Plan. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable

² In accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

alternatives, will help to achieve relevant environmental, economic and social objectives.

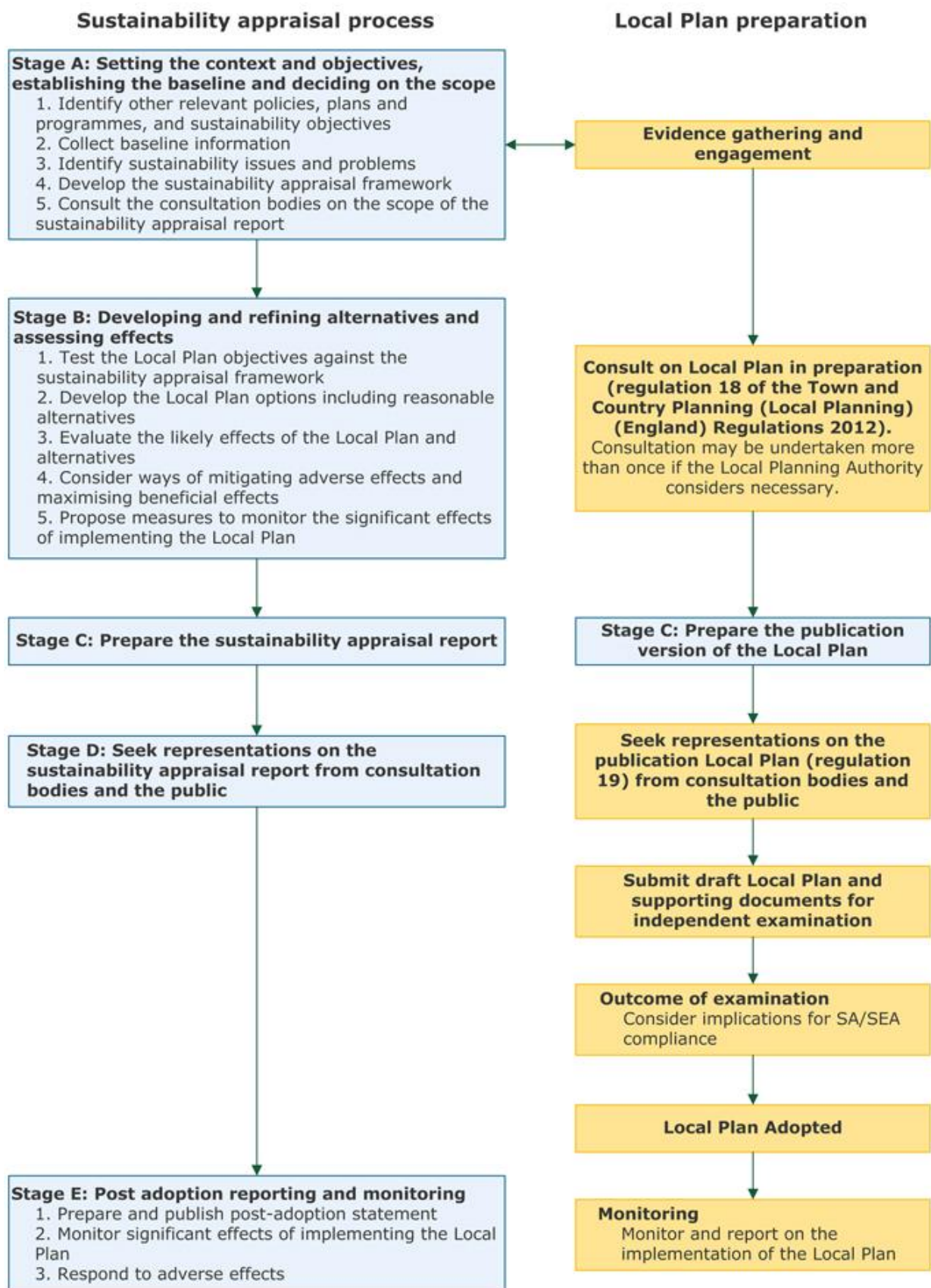
- 1.3.2 This process is an opportunity to consider ways by which the plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. By doing so, it can help make sure that the proposals in the plan are the most appropriate given the reasonable alternatives. It can be used to test the evidence underpinning the plan and help to demonstrate how the tests of soundness have been met. Sustainability appraisal should be applied as an iterative process informing the development of the Local Plan.
- 1.3.3 [Section 19 of the Planning and Compulsory Purchase Act 2004](#) requires a local planning authority to carry out a sustainability appraisal of each of the proposals in a Local Plan during its preparation. More generally, [section 39 of the Act](#) requires that the authority preparing a Local Plan must do so “with the objective of contributing to the achievement of sustainable development”.
- 1.3.4 Sustainability appraisals incorporate the requirements of the [Environmental Assessment of Plans and Programmes Regulations 2004](#) (commonly referred to as the ‘Strategic Environmental Assessment Regulations’), which implement the requirements of the [European Directive 2001/42/EC](#) (the ‘Strategic Environmental Assessment Directive’) on the assessment of the effects of certain plans and programmes on the environment. Sustainability appraisal ensures that potential environmental effects are given full consideration alongside social and economic issues.

1.4 The SA Stages and Process as applied to the Local Plan

- 1.4.1 The SA/SEA is an on-going and iterative process that feeds into and informs plan-making. Here therewith
- 1.4.2 The Council is required by law to produce a Sustainability Appraisal (SA) (incorporating Strategic Environmental Assessment (SEA) for all of its Local Plan (2011-2028) documents except for the Statement of Community Involvement, the Annual Monitoring Report, Supplementary Planning Documents (SPDs) and the Local Development Scheme.

- 1.4.3 The process of SA is set out in the national Planning Practice Guidance, as in the Figure 2, which sets out a number of stages to the SA.
- 1.4.4 The first stage of the Local Plan SA was the Scoping Report, published in January 2021, which set out the framework for the SA. With reference to Figure 1, the SA Scoping Report represents Stage A in the process. It established the SA Framework for the Local Plan. The SA Framework is set within the context of existing plans and policies, and an understanding of the current baseline situation is essential to help predict effects and identify key sustainability issues. The full Local Plan SA Scoping Report can also be found on the Council's website at [Local Plan Review – Rother District Council](#).
- 1.4.5 This Report represents Stage B of the process, as applied to the Rother Local Plan. Stage B is 'Developing and Refining Alternatives and Assessing Effects'. As described in Figure 2, it is concurrent with the regulation 18 consultation stage of Local Plan preparation. Therefore this interim Local Plan SA will be published alongside the Regulation 18 version of the Local Plan.

Figure 2 : Sustainability Appraisal Process for Local Plans



1.5 Compliance with SEA Directive/Regulations

1.5.1 The SEA Regulations set out a legal assessment process that must be followed. In light of this, Figure 3 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.

Figure 3: SEA Regulations Requirements Checklist (Source: PPG)

Strategic Environmental Assessment Regulations requirements checklist	Plan-making stage	Where met?
<p>Preparation of environmental report (regulation 12)</p> <p>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)).</p> <p>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)).</p> <p>When deciding on the scope and level of detail of information to be included in the environmental report the consultation bodies should be consulted.</p>	<p>For Local Plans, see Figure 2.</p>	<p>Rother Local Plan Sustainability Appraisal Scoping Report (January 2021) – the consultation bodies were consulted and responded to the Scoping Report.</p> <p>Consideration of alternatives for policy options is presented within this Interim SA Report</p>
<p>The information referred to in Schedule 2 is:</p> <p>a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.</p>	<p>For Local Plans, see Figure 2.</p>	<p>Rother Local Plan Sustainability Appraisal Scoping Report (January 2021)</p>

Strategic Environmental Assessment Regulations requirements checklist	Plan-making stage	Where met?
		Updated in this report – Chapters 2, and Appendix 1.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	For Local Plans, see Figure 2.	Rother Local Plan Sustainability Appraisal Scoping Report (January 2021) Updated in this report – Chapters 3 and Appendix 2.
c) The environment characteristics of areas likely to be significantly affected.	For Local Plans, see Figure 2.	Rother Local Plan Sustainability Appraisal Scoping Report (January 2021) Updated in this report – Chapters 3 and Appendix 2
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) .	For Local Plans, see Figure 2.	Rother Local Plan Sustainability Appraisal Scoping Report (January 2021) Updated in this report – Chapters 2, and Appendix 1.
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.	For Local Plans, see Figure 2.	Rother Local Plan Sustainability Appraisal Scoping Report (January 2021) Updated in this report – Chapters 3 and Appendix 2
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	For Local Plans, see Figure 2.	Chapter 5. Appendices 3 and 4.

Strategic Environmental Assessment Regulations requirements checklist	Plan-making stage	Where met?
and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.		
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.	For Local Plans, see Figure 2.	Chapter 5. Appendices 3 and 4.
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.	For Local Plans, see Figure 2.	Chapters 4 and 5. Appendices 3 and 4.
i) A description of measures envisaged concerning monitoring in accordance with regulation 17.	For Local Plans, see Figure 2.	Chapter 6.
j) A non-technical summary of the information provided under the above headings.	For Local Plans, see Figure 2.	Non-Technical Summary.
<p>Consultation procedures (regulation 13)</p> <p>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.</p>	For Local Plans, see Figure 2.	This will be delivered as part of general consultation on the Local Plan in line with the Statement of Community Involvement.
<p>Information as to adoption of plan or programme (regulation 16)</p> <p>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:</p> <ul style="list-style-type: none"> • the plan or programme adopted • the environmental report • a statement summarising: <ul style="list-style-type: none"> (a) how environmental considerations have been integrated into the plan or programme; 	For Local Plans, see Figure 2.	Post Local Plan Adoption.

Strategic Environmental Assessment Regulations requirements checklist	Plan-making stage	Where met?
<p>(b) how the environmental report has been taken into account;</p> <p>(c) how opinions expressed in response to:</p> <p>(i) the invitation referred to in regulation 13(2)(d);</p> <p>(ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;</p> <p>(d) how the results of any consultations entered into under regulation 14(4) have been taken into account;</p> <p>(e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</p> <p>(f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme. (regulation 16)</p>		
<p>Monitoring of implementation of plans or programmes (regulation 17)</p> <p>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)).</p> <p>Monitoring arrangements may comprise or include arrangements established for other purposes (regulation 17 (2)).</p>	<p>For Local Plans, see Figure 2.</p>	<p>On-going</p>

2. SUSTAINABILITY BACKGROUND

2.1 Links to Other Strategies, Plans, Policies, Programmes and Sustainability Objectives

2.1.1 Schedule 2 of the SEA Regulations requires:

- (1) “an outline of the...relationship with other relevant plans or programmes”;
and
- (5) “the environmental protection objectives established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation”

2.1.2 Appendix 1 of the SA interim Report outlines the relevant links with other plans, policies programmes and sustainability objectives. These are sub-divided according to International, European, National, Regional, Sub-Regional / County and Local /District relevance.

2.1.3 Links with other plans and programmes have been continually reviewed and updated throughout the sustainability appraisal process as first applied to the Rother Local Plan 2020-2040 in the SA Scoping Report. Therefore, this report should be read alongside, and complementary to, the Scoping Report. Appendix 1 of the current document is therefore a further update and review.

2.1.4 The following sections 2.2 and 2.3 comprises a further re-cap of the main international and national policies, plans and programmes.

2.1.5 Section 2.4 updates ‘Key Local Plans, Policies and Programmes’ that have been published subsequent to the most recent SA Scoping Report (January 2021).

2.1.6 Section 2.5 ‘Implications of New and/or Altered Strategies, Plans, Policies, Programmes and Sustainability Objectives’ considers in more detail updates regarding key policies and programmes that had been published subsequent to the most recent SA Scoping Report (July 2013).

2.2 Key International Plans, Policies and Programmes

- 2.2.1 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’) are 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.
- 2.2.2 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 through national-level policy; however the international directives have been included in Appendix 1 for completeness.

2.3 Key National Plans, Policies and Programmes

- 2.3.1 The most significant two national documents in terms of the policy context for the Local Plan are the National Planning Policy Framework (NPPF) which was most recently updated in December 2023 and the Planning Practice Guidance.

The National Planning Policy Framework (2023)

- 2.3.2 The Local Plan must be consistent with the requirements of the NPPF. The NPPF (in paragraphs 7 to 14) sets out information about the purposes of local plan-making, stating that:

“The purpose of the planning system is to contribute to the achievement of sustainable development... At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs... Achieving sustainable development means that the planning system has three overarching objectives...an economic, social and environmental objective... These objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and

decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.”

2.3.3 The NPPF also requires Local Plans to be ‘aspirational but realistic’. This means that opportunities for appropriate development should be identified in order to achieve net gains in terms of sustainable social, environmental and economic development; however, significant adverse impacts in any of those areas should not be allowed to occur.

2.3.4 The NPPF requires local planning authorities to set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:

- the homes and jobs needed in the area;
- the provision of retail, leisure and other commercial development;
- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- the provision of health, security, community and cultural infrastructure and other local facilities; and
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

2.3.5 In addition, Local Plans should:

- plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of the NPPF;
- be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements (over a 30 year vision), and be kept up to date;
- be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;
- indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;
- allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
- identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;

- identify land where development would be inappropriate, for instance because of its environmental or historic significance; and
- contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.

2.3.6 A separate ‘Planning policy for traveller sites’ was most recently updated in December 2023 (original produced in 2012), and this has been considered in conjunction with the NPPF.

The Planning Practice Guidance (PPG)

2.3.7 The Planning Practice Guidance (PPG) was first published two years after the NPPF in March 2014 and is continually updated. Together, the NPPF and PPG set out what the Government expects of local authorities. The overall aim is to ensure the planning system allows land to be used for new homes and jobs, while protecting valuable natural and historic environments.

2.3.8 The PPG adds further context to the National Planning Policy Framework (“NPPF”) and it is intended that the two documents should be read together.

2.3.9 Plan makers must have regard to national policies and advice contained in the guidance when developing their plans. Therefore local plans may reflect what the guidance says about certain topics. The guidance is also a ‘material consideration’ when taking decisions on planning applications. This means that if a local policy is deemed out of date, local authorities may be directed by the national guidance’s requirements.

Further Consideration of the Implications of Key New and/or Altered National Strategies, Plans, Policies, Programmes and Sustainability Objectives

2.3.10 There have been a number of plans, policies and programmes that have been published since the production of the Council’s SA/SEA Scoping and some of these potentially impact upon the Sustainability Appraisal and warrant a closer examination. In most they have involved a national decision or direction that will have local implications on the Local Plan.

Affordable Housing Provision

- 2.3.11 In line with Planning Practice Guidance and the requirements of the NPPF, the Council must factor in the requirements of First Homes to its affordable housing policies. This has been a change in national policy direction since the SA/SEA Scoping Report was published.

2.4 Key Local Plans, Policies and Programmes

- 2.4.1 Since publication of the SA Scoping Report, a number of relevant local plans policies or programmes have been produced that are of relevance to the SA process. This section updates the position to March 2024.

- 2.4.2 The first iteration of the Local Plan will be the 'Regulation 18 Consultation Version' – which this SA supports. It is supported by the following background papers:

- Development Strategy
- Housing
- Employment and Commercial Development
- Climate Change
- Rural Landscape
- Heritage
- Infrastructure
- Health and Wellbeing
- Environmental Management

International (Natura 2000) Sites and Environmental Designations

- 2.4.3 There have been no recent changes (extensions or proposed extensions), to the international sites network in Rother since the SA Scoping Report.

- 2.4.4 The Pevensey Levels SAC was designated in early 2016, being upgraded from proposed SAC status, and reflecting the boundary of the pre-existing Pevensey Levels Ramsar. The Dungeness, Romney Marsh and Rye Bay SPA was expanded in March 2016 so as to incorporate and replace the 'Dungeness to Pett Level SPA'. This was also formally designated as a Ramsar Site recently after this. A marine extension to the SPA was also designated which extends virtually the full length of Rother's coastline, with the only exclusion being the marine area opposite Norman's Bay and the South-West of the District.

2.4.5 The implications of growth identified in the Local Plan on all the designations, have been considered as part of the Habitats Regulations Assessment process.

Habitats Regulations Assessment

2.4.6 A Habitats Regulations Assessment (HRA) Interim Report has been undertaken for the draft Rother Local Plan to consider the potential impacts of the development strategy on international sites of nature conservation importance - being primarily the Dungeness Complex of sites that straddle the Rother/Folkestone & Hythe boundary in the east of the District and the Pevensey Levels, straddling the Rother/Wealden boundary in the south-west of the District. The HRA found that for the draft core policies and the quantum and distribution of housing proposed, (specific to individual settlement level) impacts would be acceptable, subject to certain provisions. In particular, the HRA recommends that:

- air quality modelling of the combined developments is modelled and the results are available for assessment in the Regulation 19 version of the Rother Local Plan.
- the Draft Dungeness Complex SARMS is completed and published to allow effective implementation of Proposed Policy ENV6. It is considered in this HRA that all net new housing within Rother District located within this 10km zone around the Dungeness Complex will have a disproportionate impact on the Complex (along with residents in a similar zone in Folkstone & Hythe) and therefore require mitigation.
- governance arrangements for the management and measurement of The Dungeness Complex SARMS measures are put in place and referenced appropriately in the Policy ENV6. This should include a body for delivery of the measures, a charging tariff, a mechanism for collecting funds from affected developers, and a regular review process to inform future reviews of measures. The tariff would be informed by consideration of the cost of implementing the identified measures and the number of dwellings that are likely to be affected. Since the SARMS is a joint exercise between Rother and Folkestone & Hythe, this exercise should also be done jointly.

- the following text should be added to proposed Policy ENV1:

‘All developments connected to Wastewater Treatment Works discharging into the catchment of the Dungeness, Romney Marsh and Rye Bay SPA/ Ramsar should demonstrate:

- agreement by the wastewater provider that modelling demonstrates that there is sufficient capacity within the relevant WwTW that the housing can be accommodated without a negative effect on the receiving environment; or
- that the development can be delivered without a negative water quality effect on the Habitats sites, and the means by which any necessary protection measures will be secured for the lifetime of the development.

2.4.7 The interim HRA suggests some recommendations which can be actioned after the Regulation 18 consultation stage of the Rother Local Plan, and this will therefore be addressed in the final SA/SEA report for the Local Plan along with the final HRA.

Community Infrastructure Levy (CIL)

2.4.8 The Community Infrastructure Levy allows local authorities in England and Wales to raise funds from developers undertaking new building projects in their area to fund a wide range of infrastructure that is needed to support new development. This includes transport schemes, schools, flood defences, hospitals and other health and social care facilities, parks, green spaces, leisure centres and other community and cultural facilities. As almost all development has some impact on the need for infrastructure, services and amenities, this tariff-based approach is seen as an effective, quicker and fairer framework to fund new infrastructure to support growth.

2.4.9 The CIL Charging Schedule came into effect on 4 April 2016 and applies to all specified development permitted after this date, subject to national exemptions as set out in Regulations. The CIL charge is amended each year by a specific index.

- 2.4.10 The Council will be reviewing its CIL charges at the next stage of the Local Plan to ensure that the overall development viability of proposed policy requirements, such as affordable housing, and proposed CIL can be assessed.

Infrastructure Delivery Plan (IDP)

- 2.4.16 The Infrastructure Delivery Plan (IDP) is part of the evidence base informing the preparation of spatial policy in the Rother Local Plan. The first draft IDP identifies the infrastructure needed to support development proposed by the Local Plan at an early stage and assists with project managing the planning, programming and funding of work required to ensure that infrastructure is provided in a timely manner. This will require detailed feedback from stakeholders as part of the Regulation 18 consultation.

3. SUSTAINABILITY ISSUES

- 3.0.1 [Regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004](#) sets out the formal requirements of an ‘environmental report’, which should form an integral part of the sustainability appraisal report and is a core output of any strategic environmental assessment.
- 3.0.2 The PPG confirms it is the role of the SA/SEA Scoping Report to ‘set out the context, objectives and approach of the assessment; and identify relevant environmental, economic and social issues and objectives’.
- 3.0.3 The identification of sustainability issues in Rother will be an on-going process rather than a single ‘event’. Views and information on the key issues for the district will be further informed through the Local Plan process as it progresses through to final proposed policies at the submission version.
- 3.0.4 At this point in the process, sustainability issues have been identified based upon:
- Key messages from the review of relevant Policies, Plans and Sustainability Objectives
 - The baseline information, as set out in SA the monitoring framework, which is monitored through the Council’s Authority Monitoring Report; and
 - Knowledge gained through the preparation of the Rother District Local Plan
- 3.0.5 The identified issues reflect in the objectives set out in the Sustainability Appraisal Framework in section 4.1.
- 3.0.6 Whilst the objectives have been categorised as ‘Economic’, ‘Social’ or ‘Environmental’, it should be noted that this sub-division is not necessarily a clear distinction - to some extent, all objectives have an environmental, social and economic implication. However, for the purposes of the assessment, the objectives have been apportioned to the category where effects are considered most likely to be significant.

3.1 Environment

Waste & Recycling (Sustainability Appraisal Framework (SAF)

Objective 13)

- 3.1.1 The East Sussex Joint Waste Strategy 2014 to 2025 reveals that since 2006, the County has doubled the amount of waste that is reused, recycled and composted and reduced waste sent to landfill by over 90%. By 2012/13 the County recycled, composted, reused or recovered energy from 94% of household waste and only 5.5% went to landfill (5.6% in Rother). These figures are borne out and updated in the baseline information presented in the 2022/23 Local Monitoring Report). This shows that in 2021, household recycling and energy recovery had increased from the previous year. Pebsham Landfill Site between Bexhill and St Leonards was the last active site in the County. The last section of this site closed in November 2013 and is currently undergoing restoration as part of proposals to incorporate the site into the Combe Valley Countryside Park. There are no plans for any future landfill or land raise sites in East Sussex. Small quantities of waste are currently sent to landfill in West Sussex. The Waste Authority is working with neighbouring authorities and contractors to reduce this further still.
- 3.1.2 Rother now (2021 data) recycles 28.3% of total household waste (an increase in 10% from the last SA report based on 2012 data), above the East Sussex level of 26.9%. Additionally, Rother composts 19.3% of total household waste, well above the East Sussex figure of 15.7%.
- 3.1.3 Despite a lot of good progress, the average East Sussex household (in 2021) still creates almost a tonne of waste and recycling each year, that's some 243,000 tonnes of waste in total. The cost of dealing with this is around £155 per household per year. On top of that, the average UK household throws away £480 worth of food and drink annually that could have been consumed. Businesses also spend some 4% of their turnover on dealing with their waste. The recycling targets set out in the Joint Waste Strategy are 60% by 2025.
- 3.1.4 The household waste per head (kg) is low in Rother (407kg per annum) when compared to the East Sussex figure of 434kg per annum. However, although it has fluctuated, the Rother figure has risen slightly over the last 3 years, whilst the East Sussex figure has exhibited a slight redeuction.

Landscape Quality (SAF Objective 15)

- 3.1.5 The High Weald AONB Management Plan, County Landscape Assessments and the Council's previous Green Infrastructure Study all highlight the key issue of ensuring the District's high landscape quality is maintained as well as enabling and encouraging people to value and enjoy the natural environment as a whole.
- 3.1.6 Over 83% of Rother District falls within the High Weald National Landscape reflecting its national landscape importance. The High Weald AONB Management Plan identifies the key characteristics of the designation area as well as objectives to maintain and enhance the area.
- 3.1.7 There are three national landscape character areas in the District. The District can be sub-divided further into local landscape character areas (see the landscape chapter of the Local Plan) which are largely defined by river valleys. The County Council's Landscape Character Assessments identify problems and pressures for each character area, formulate a vision and provide landscape action priorities.

Biodiversity (SAF Objective 2)

- 3.1.8 Biodiversity is, in short, the variety of life. The Biodiversity Action Plan for Sussex notes that the County has a wide range of habitats including flower-rich meadows, ancient wooded valleys, coastal sand dunes and shingle. Many of these habitats have declined in area and quality over the past 100 years. In Sussex, 508 Biodiversity Action Plan priority species have been recorded (that's more than 44% of the UK total). Species are listed as a result of being globally threatened and/or in rapid decline in the UK.
- 3.1.9 Within Rother, some 5% (approximately) of the land area is classed as sites of international significance for nature conservation. These are at Pevensey Levels (Ramsar site and Special Area of Conservation) and in the Dungeness, Rye and Pett Level area (various sections designated Special Protection Area, Special Area of Conservation and Ramsar). In addition the marine extension to the Dungeness, Romney Marsh and Rye Bay Special Protection Area (pSPA) extends across most of the marine area fronting Rother District. The Council's Habitats Regulations Assessment assesses the impact of proposed development on these areas. There are also nationally important Sites of Special Scientific Interest, principally around wetland areas near the coast and a number of more locally significant Sites of

Nature Conservation Importance. A key issue in national and local policy is how overall biodiversity can be protected and enhanced.

- 3.1.10 Some 16% (approximately) of the District is covered by ancient woodland with another 8% coastal and floodplain grazing marsh. There are approximately 20 other BAP Priority or Special to Sussex habitats, which are individually less significant in coverage. Collectively, BAP Priority habitats are widespread across the District and their preservation and enhancement is key.

Built Environment (SAF Objective 11)

- 3.1.11 Rother benefits from a high quality built environment. The District has over 2,100 Listed Buildings, 10 Conservation Areas, 53 Scheduled Monuments and 7 registered parks and gardens.
- 3.1.12 Key considerations are, how such historic quality can be conserved and enhanced, and how good quality design including the efficient use of resources, can be incorporated into the design of future buildings and public spaces. Eight listed buildings and seven scheduled monuments in Rother are classed by Historic England as being 'at risk'.

Climate Change (SAF Objectives 5, 6)

- 3.1.13 As outlined in the Environment Strategy for East Sussex (2020), as well as the local Environment Strategy for Rother (2019) climate change is likely to lead to more extreme weather, such as more heat waves, storms and flash flooding, with significant implications for the costs of maintaining our infrastructure.
- 3.1.14 In Rother each person creates an average of 6.6 tonnes of CO₂ per year, including the emissions created from the goods and services we buy. This is above the East Sussex average of 5.4 tonnes, but below the national average of 7 tonnes. Our sustainable world fair share will be only two tonnes per person by 2050.
- 3.1.15 Further key issues stem from development on floodplains and how this affects our ability to adapt to the predicted impacts of climate change, as well as the need to reduce the use of natural resources, energy consumption and carbon emissions, improve energy efficiency and source more of the county's energy from our local renewable sources.

Water Quality (SAF Objective 14)

- 3.1.16 Domestic water usage is generally high in the South East region compared to national usage. The Environment Agency (EA) has highlighted the entire area of the South East as ‘water-stressed’ - Both Southern Water and South East Water are classified as being a water stress area in all scenarios.
- 3.1.17 Rivers in Rother District require biological and morphological work to enhance them and aquatic pollution, particularly rural drainage pollution, needs to be addressed so that the chemical quality of controlled waters in Rother improves.
- 3.1.18 There are 24 water bodies within Rother District. Of these, based on previous 2013 Cycle 2 classifications, 8 are at good status, 12 is at moderate status and 4 are at poor status. As moderate and poor status constitutes a failure in the Water Framework Directive (WFD), only 33% of the water bodies in Rother District pass WFD criteria; two thirds fail WFD criteria.
- 3.1.19 The European Union’s Water Framework Directive (WFD) (2000/60/EC) came into force in December 2000 and became part of UK law in December 2003. The WFD requires the water-bodies (both surface and groundwater) of all European Union member states to achieve ‘good ecological status’ or ‘good ecological potential’ by 2027. The Directive also requires that no water-bodies experience deterioration in status. Good status means good ecological status and good chemical status, as defined by a number of quantifiable quality elements.
- 3.1.20 Regarding bathing water, recent results show Bexhill classified as ‘Sufficient’ in 2022, which is a drop in standards since the last SA was published. Winchelsea and Camber have both been classed as ‘good’, which has been stable for several years. Norman’s Bay is classed as ‘excellent’, having improved from the previous year.

Air Quality (SAF Objective 1)

- 3.1.21 The wider environmental costs of air pollution, greenhouse gas emissions and noise from UK transport are estimated to be between £8.7bn and £19.3bn per year.
- 3.1.22 The East Sussex Environment Strategy noted that:

‘Road traffic continues to have impacts on the environment and local communities through air pollution, noise, and the emission of greenhouse gases; this means that

environmental and health costs (and the associated health inequalities) continue to affect the county’.

- 3.1.23 Natural England have highlighted that traffic growth on roads within 200m of sensitive designated habitats has the potential for development to impact on the natural environment (in particular designated habitats).
- 3.1.24 An Air Quality Management Area (AQMA) does not need to be designated in Rother at present. However, the review and assessment process for air quality will continue.

3.2 Social

Community Safety (SAF Objective 10)

- 3.2.1 Although Rother has generally low rates of criminal offences compared with the South East and England & Wales, the Ipsos Mori, Place Survey shows a comparatively high fear of crime, particularly after dark. However, the same survey showed very high levels of satisfaction with Rother as a place to live.
- 3.2.2 IMD Crime deprivation mapping indicates particular issues in the far east of the District around Camber, and to a lesser extent in central Bexhill.

Children & Young People (SAF Objectives 9)

- 3.2.3 In respect of child poverty specifically, parts of Bexhill and an area of Rye and Eastern Rother fall within the top 20% most deprived areas in the country. As of 2016, 16.8% of Rother’s children were living in poverty which is a high figure compared to East Sussex and the wider South-east region, but comparable nationally.

Culture & Leisure (SAF Objective 9)

- 3.2.4 Cultural and leisure opportunities can have a role in improving the quality of people’s lives by promoting healthy lifestyles, supporting community cohesion, reducing crime and anti-social behaviour, supporting the economy and regeneration and contributing to environmental protection. The Hastings & Rother Playing Pitch Strategy and Built Facilities Strategy (2023-2029) mapped access to leisure facilities,

which not surprisingly showed Bexhill to benefit from better access in comparison to rural areas of the District.

- 3.2.5 Leisure centre visits have increased in Rother, as have visitors to the De La Warr Pavilion in Bexhill.
- 3.2.6 However, levels of participation in sport are low in Rother compared to other areas, possibly as a consequence of having a comparatively older population. Rother also exhibits a low proportion of the population who are within 20 minutes travel time of sports facilities, which is another possible factor. There are also some quantity and access deficits of open space in the District, notably of larger green-spaces (100ha +) particularly around Bexhill.

Health and Well-being (SAF Objective 7)

- 3.2.7 Rother has a high proportion of people with long-term health problems or disabilities (23.7%) compared to the County at 21.6%. Long-term health and disabilities problems are particularly apparent in Central Bexhill and Sidley. Living environment issues, which may be a factor in poor health, are also apparent in Central Bexhill, as well as the east of the District and the remote rural west of the District.
- 3.2.8 The Rother Community Strategy recognises that an overall improvement in the health of Rother's residents and a reduction in health inequalities are important objectives. The Community Strategy for East Sussex highlights the importance of supporting older people to live independently for as long as possible.
- 3.2.9 The Community Strategy for East Sussex (2012 Update) identified the following as a strategic priority by 2026:

'Reduced health and care inequalities within and between communities and an improvement in overall health and wellbeing'

Housing (SAF Objective 8)

- 3.2.10 Over recent years increases in average household incomes in Rother have not kept pace with house price rises, with the consequence that houses are becoming less and less affordable for local people, particularly in rural areas.

- 3.2.11 The affordability ratio in 2022 was 11.4 in Rother, compared to just over 8 in England. Rother has over 2,000 households on the housing register (2024).
- 3.2.12 Without an adopted Local Plan in place, there would be serious consequences for the rate of housing delivery, and in turn the availability and affordability of housing for residents.

Transport & Accessibility (SAF Objectives 9, 20)

- 3.2.13 The Community Strategy for East Sussex (2012 Update) identified the following as a strategic priority by 2026, which is mirrored in many other more recent strategy documents:

‘To improve sustainable transport choices and access to services and facilities within and between communities in the county.’

- 3.2.14 Access to services in rural parts of the District is particularly constrained whilst public transport services are generally limited. The 2021 Census revealed that more than 54% of journeys to work in Rother are by car whereas around 3% are by bus or train. The District shows a greater degree of car dependency in comparison to national, regional and county-wide figures.
- 3.2.15 Local Transport Plan 4 identified several key priorities for Battle, Rye and Rural, including improvements to transport and improving access to key services in the area. Similarly at the county level it is recognised that access to services is constrained, in part, by the overall lack of internet connectivity across East Sussex.

Deprivation (SAF Objective 18)

- 3.2.16 The 2019 Indices of Multiple Deprivation rank Rother as the 135th most deprived local authority area out of the 354 in England. There are pockets of more severe deprivation in parts of Bexhill and in parts of Rye and eastern wards of the District.
- 3.2.17 Figures show that 10.5% of Rother households are classed as being in fuel poverty (2020), which is low compared to England & Wales, but high compared to the wider county and region.

3.3 Economic

Education & Skills (SAF Objectives 19)

- 3.3.1 Educational attainment at GCSE level in Rother is relatively low, with 56% achieving 5+ GCSEs compared to 58% for East Sussex. Furthermore, a high proportion of residents have no qualifications and a low proportion have the highest level of qualifications, although this may be at least partially age related. Education skills and training deprivation is focused in Bexhill and the east of the District

Jobs (SAF Objective 17)

- 3.3.2 Unemployment rates, as well as long-term unemployment and proportions who have never worked, are all higher in Rother compared to East Sussex and in South East England. Employment deprivation is not evenly spread in the District, but is particularly focused in Bexhill and on the east of the District
- 3.3.3 The Housing and Economic Development Needs Assessment (HEDNA) identifies a need for some 74,000sqm of employment floor-space for the District and this is reflected in Core Strategy policy. Evidence documents also identify that rural employment opportunities need to be strengthened to help ensure a sustainable future for local rural communities.

Local Economy & Regeneration (SAF Objective 16, 19)

- 3.3.4 East Sussex exhibits generally low wage rates, significant levels of employment in lower paid sectors and a county GDP which is less than two thirds of the national average. Firms in Rother are generally quite small compared to the wider County and region, although business survival rates are quite high compared to county and national figures. Approximately 13% of businesses across the High Weald are classed as 'land-based' (compared to 3% nationally).
- 3.3.5 The relative peripherality of the district, compounded by constrained strategic transport links, serves to affect Rother's economic fortunes. 'Securing economic growth' has been identified as one of the main strategic development issues in Rother's Local Plan, with a strategic objective being identified as follows: *'Create economic prosperity, both in rural and urban locations, meeting the employment needs*

of the wider population, improving the quality and variety of jobs, and being flexible to the changing needs of the economy’.

- 3.3.6 The Community Strategy for East Sussex (2012 Update) identified the following as a strategic priority by 2026, which is carried forward in more recent evidence base :

‘To narrow the gap within and between communities in the county, and between the county and the region, in order to develop a thriving, diverse and sustainable economy where everyone can prosper.

4. APPRAISAL METHODOLOGY

4.1 The SA Framework

- 4.1.1 The production of an SA Framework is a key element of the SA process.
- 4.1.2 It is appropriate to periodically update the SA Framework which needs to be set within the context of existing plans and policies. The SA Framework (Figure 4 below) was reviewed through the SA/SEA Scoping Report for the Local Plan, which set 20 new objectives which should be used to assess the impact of policies, accompanying Rother's emerging Local Plan. The set of 20 objectives in the SA Framework was an output originally derived from cooperative working with Hastings Borough Council through a joint SA/SEA Scoping Report.
- 4.1.3 Through this process Rother DC and Hastings BC developed its own set of 'appraisal questions' and 'indicators' and these have continued to evolve, in consultation with the Statutory Environmental Bodies (SEBs).
- 4.1.4 The Local Plan SA Framework visible in Table 3 was published in the SA/SEA Scoping Report which underwent consultation with the SEBs and was published in January 2021
- 4.1.5 A series of decision-aiding questions has been devised for each SA Objective in order to facilitate the appraisal process. Each question will be assessed in order to identify:
- Whether the principal impacts of the Option are positive or negative (clearly some may support one objective while conflicting with another, although this does not mean the impacts cancel one another out);
 - How these impacts may change over time (this cannot always be determined);
 - The relative magnitude of the impacts.
- 4.1.6 The final point, referring to magnitude, serves as an initial proxy for identifying the relative significance of the impacts. This activity also provides an initial opportunity to identify potential cumulative and synergistic impacts and to consider appropriate mitigation measures.
- 4.1.7 Whether an effect is considered likely to be significant will depend on whether it has a 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;
- How they contribute to achieving, or restrict the achievement of the various elements of the SA Objectives.

4.1.8 The data for indicators is monitored and published in a variety of sources including the ESCC East Sussex in Figures (ESiF) website, the ESCC Research & Information team, the Council’s Annual Monitoring Report (AMR), the Council’s Corporate Performance monitoring, as well as from third party organisations.

Figure 4: SA 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.	<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • Protect and enhance sites designated for their nature conservation interests? • Protect, conserve and enhance the town’s priority species and habitats, and increase local biodiversity? • Achieve a net gain in biodiversity? • Protect and enhance ecological networks?

SA Theme	SA objective	Appraisal questions... will the option/proposal help to...
Energy and Water Consumption	3. The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation)	<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • Reduce levels of childhood obesity? Reduce death rates? • Promote healthy living and active lifestyles? • Reduce health inequalities? • Improve access to high quality health facilities?
Population Health and Wellbeing	8. More opportunities are provided for everyone to in a suitable home to meet their needs.	<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • 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?

SA Theme	SA objective	Appraisal questions... will the option/proposal help to...
Population Health and Wellbeing	10. Safe and secure environments are created and there is a reduction in crime and fear of crime.	<ul style="list-style-type: none"> • Reduce actual levels of crime? • Reduce the fear of crime?
Heritage	11. Historic environment/ townscape is protected, enhanced and made more accessible.	<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • Conserve and enhance the High Weald AONB in line with the aims and objectives of the 2019-2024 Management Plan? • 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.	<ul style="list-style-type: none"> • Improve economic performance?
Skills, Employment and Economic Development	17. There are high and stable levels of employment and diverse employment opportunities for all.	<ul style="list-style-type: none"> • Reduce short and long-term unemployment? • Help to improve earnings? • Increase the number and range of employment opportunities?

SA Theme	SA objective	Appraisal questions... will the option/proposal help to...
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.	<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • 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?

4.2 Compatibility of SA Objectives

- 4.2.1 One of the difficulties encountered when undertaking the sustainability appraisal is that objectives themselves may, to some extent at least, be inherently incompatible. Conflicts may exist between objectives and what they aim to achieve.
- 4.2.2 Figure 5 shows the compatibility and potential conflicts between the Sustainability Objectives.
- 4.2.3 Highlighting these potential inconsistencies between different Sustainability Objectives allows the 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.
- 4.2.4 In addition to highlighted red crosses, a number of inter-relationships are marked 'o' to indicate neutrality or uncertainty.
- 4.2.5 The potential for conflicts in achieving development objectives and environmental objectives may arise particularly around the prioritisation of space and land to meet

different objectives. The conflicts which the matrix highlights are as follows:

Objective 8: More opportunities are provided for everyone to in a suitable home to meet their needs.

- 4.2.6 A potential negative impact with ‘13 *Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced*’ is highlighted. This is because inevitably the generation of new housing and increased population will create an additional burden on waste disposal and it cannot be certain that waste re-use, recycling and minimisation will be delivered by all new residents, meaning an inevitable negative impact.
- 4.2.7 Residential development will also inevitably result in more cars on the road, and hence a negative impact, in relation to ‘10. *Road congestion levels are reduced and there is less car dependency and greater travel choice.*’
- 4.2.8 Whilst it may be considered that there would be a potential negative impact with objective ‘15. *Ensure that Parks, gardens and countryside are protected, enhanced and made more accessible,* because the District is 83% High Weald National Landscape along with numerous other environmental and heritage constraints, it is the responsibility of planning policies to create negative harm in line with the NPPF. Whilst it will be a challenge to accommodate growth and avoid all harm to these assets, new residential development will to be directed, wherever possible, away from areas of high quality landscape character and as such is considered a neutral impact.
- 4.2.9 Compatibility with other SA objectives is considered neutral or unknown. In advance of a planning application, the exact layout of a site is difficult to confirm categorically in light of ‘10. *Safe and secure environments are created and there is a reduction in crime and the fear of crime,* although policy layout parameters do address such issues. Also in relation to objective 10, the nature of the rural area means it will simply not be possible to ensure all development is in close proximity of a police station.
- 4.2.10 Inevitably, residential development may be on land that is currently, was previously, or could potentially have been used for employment purposes (Objective 16. *Economic performance is improved.*). Conversely, housing growth may in itself be a boost the economy, both directly to the construction industry, and indirectly by virtue of locating close to employment centres, therefore overall this is a neutral impact.

Figure 5 : Matrix of Compatibility of SA Framework 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
14																o	o	o	o	o
15																o	o	o	o	o
16																	+	+	+	o
17																		+	+	o
18																			+	o
19																				o
20																				

4.3 Assessment Scoring

4.3.1 Sites, policies and options are assessed against the 20 SA objectives, as set out in ‘SA/SEA Scoping Report’, which also contains ‘decision-aiding questions’ and indicators.

4.3.2 An overview of the degree to which a site meets the sustainability objectives is given in symbol form, as follows in Figure 6.

Figure 6 : Assessment Scoring – Symbols Explanation

Symbol	Explanation
++	Potentially significant beneficial effect.
+	Option supports the objective, or elements of the objective on balance, although effects may be minor.
o	Policy 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 minor adverse effects.
--	Potentially significant adverse effects.

4.4 The SA for the Development Strategy, Potential Sites, Proposed Policies and Alternatives

- 4.4.1 This SA report (and supporting appendices) comprise the detailed SA assessments of ‘Development’ (as opposed to ‘Site’) Options, including preferred options/policies and any reasonable alternatives that have been discounted at this stage. This provides a detailed assessment of all of the individual SA appraisals for policy options under each of the topic areas of the Local Plan. The tables that are contained within the following sections of this report provide a comparative summary of these assessments, providing an assessment of short term to long term impacts and synergies with other policies within the Local Plan.
- 4.4.2 The Background Papers that have been provided under the specific topic areas help provide an ‘audit trail’ of the development of policies and form a clear justification for the proposed policies at this stage of the Local Plan.
- 4.4.3 In some cases, the key issue is whether or not a new Local Plan policy needs to be carried forward in its existing form from the Core Strategy or DaSA, in which event, the alternatives are along the lines of ‘a new/more detailed policy’ or ‘no policy’ policy. For a no policy approach .

- 4.4.4 The existence of key information specific to local circumstances is typically a factor in determining whether a more detailed policy should be considered rather than just relying on a national policy direction. Energy efficiency or biodiversity net gain is a particular example of this, where government gives scope for an ‘optional, base or minimum standard’ or for a different locally justified approach such as space standards or access standards.
- 4.4.5 In other cases, the specific nature of policy is regarded as the main issue and, hence, the basis of realistic options. This is generally related to the degree of prescription or flexibility that a policy should have, sometimes reflected in its level of detail and is the basis of options in relation to residential extensions and annexes, shop fronts and advertising, holiday sites, existing business uses, and green spaces for instance.
- 4.4.6 Where there is information (which may relate to wider policy changes as well as local circumstances) that suggest a revision to an existing policy, the existing approach and an updated approach are both assessed. This applies to affordable housing (following current national guidance) and sustainable drainage for instance.
- 4.4.7 There are some topics where discrete, but not necessarily mutually exclusive, approaches can be identified and each of these is assessed. This relates particularly to new policy areas in relation to live well locally and green to the core. Renewable and low carbon energy options will relate to discrete technology opportunities, wind and solar for instance, as well as the consideration reasonable but distinct alternative thresholds
- 4.4.8 Further details of the selection of alternatives will be contained in the respective background papers to the Local Plan.
- 4.4.9 Development options and policies are assessed using the following templates (Figures 7, 8 and 9). Sites that have been considered as part of the draft development strategy have only been assessed under Figure 7, comparing their relative sustainability merits. A full SA assessment will be undertaken when sites are proposed and detailed as allocated sites at the next stage of the Local Plan.

Figure 7 : Method for assessing development options

Policy option 1a: XXX

SA theme	SA objective	Appraisal questions... will the option/proposal help to...	Short term impact	Medium term impact	Long term impact	Commentary
Air quality	1. Reduce air pollution from transport and development and improve air quality.	<p>Improve air quality?</p> <p>Avoid locating development where air quality could negatively impact upon people's health?</p> <p>Reduce the amount of Air Quality Management Areas?</p> <p>Does it support the take up of low or ultra-low emission vehicles?</p>	++	+	o	

Figure 8 : Method for assessing development options

SA Objective / Draft Policies	1a	1b	1c	2a	2b
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.	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.	++				
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.	-				

SA Objective / Draft Policies	1a	1b	1c	2a	2b
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	X	X	X	X	X

Figure 9 : Method for assessing development options, synergies, mitigation and commentary

1. Does this have a significant 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 policies (or options) which might amplify the effect?	6. Commentary/Notes
	State Y/N	Negative (-1)	Neutral (0)				
							Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score
Policy A							
Policy B (etc)							

4.4.10 Figure 8 provides a key tool to draw together the conclusions of the SA process for each policy, drawing on:

- **Potential Mitigation** - Potential to mitigate negative effects and enhance positive effects.
- **Cumulative and Synergistic Affects** - factors may interact in a synergistic way and may increase cumulative affects either positively or negatively.

Development Sites and Boundaries

- 4.4.11 This SA report has assessed all potential development sites that form part of the current identified supply (commitments and allocations), other potential sites (developable HELAA sites), and sites which have been submitted to the Council for consideration but have been dismissed on suitability grounds at this stage of the Local Plan. It is considered that the submitted sites which have been assessed as undevelopable at this stage form the reasonable alternatives that should be assessed in the Local Plan for completeness.
- 4.4.12 The above reasoning results in their not being a range of growth options to assess as part of 'reasonable alternatives' for the development strategy. The types of development that could come forward have been assessed in principle under the development strategy section of the plan, but this is based in principle and not exact quantum of development. There are several environmental constraints across the district, as supported in the evidence in the Local Plan evidence base. This has resulted in a proposed strategy that maximises housing and employment growth potential as one proposed strategy option. The reasonable alternatives would be the addition of sites which have been assessed as available but not suitable for development in the Draft HELAA, which are assessed in this SA report.
- 4.4.13 The Council are planning to review development boundaries as part of the next stage of the Local Plan. The Council will need to confirm the potential of new development sites and how these may impact existing development boundaries and the need for them to be potentially extended. At this moment in time the Local Plan identifies settlement areas that it believes will continue to have development boundaries and the need for an additional one to cover the settlement of Playden. This approach will be discussed, but as there is no detail over the exact locations, they cannot be assessed in detail through the SA process.
- 4.4.14 Specific consideration is also given to potential Gypsy and traveller sites. Alternatives are those sites in existing temporary use for that purpose, suitable sites adjacent to existing permanent sites and other sites with an accepted willing landowner.
- 4.4.15 The identification of potential employment sites stems from the need identified in the Councils HEDNA. This is explained in detail in the supporting Economy Background Paper. That shows that there is quantitative need to bring forward existing allocated sites in order to help meet overall need. Additional sites should be identified, especially in rural locations to allow flexibility for economic growth

across the District. Windfall developments will be supported in acceptable locations in line with proposed policies in the Local Plan.

- 4.4.16 There are also some sites where other uses are also considered worthy of assessment. These could be for mixed use to include retail or community uses, where a need has been identified through relevant studies and endorsed by the local community itself.
- 4.4.17 As the decision on sites is not currently progressed far enough to determine specific detail that you would expect at a site allocation stage, the SA has only assessed policies and development sites in principle.

Health Impact Assessment

4.4.18 The Council have worked closely with the Healthy Places team at East Sussex County Council to help shape policies in the Local Plan. 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 identified in Figure 10):

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

4.4.19 This process helps to ensure that health and wellbeing considerations are assessed widely across the Local Plan, and that linked benefits can be maximised. The detail of the HIA for the proposed policies can be found in the following sections of the SA. Each area of the plan concludes with an assessment of the proposed policies against the HIA criteria below.

Figure 10 : Template HIA for the screening and assessment of Local Plan policies

HIA Screening	Policy A	Policy B
1. Will the policy have a direct impact on health, mental health and wellbeing?	Yes/No	Yes/No
2. Will the policy have an impact on social, economic and environmental living conditions that would indirectly affect health?	Yes/No	Yes/No

3.	Will the policy affect an individual's ability to improve their own health and wellbeing?	Yes/No	Yes/No
4.	Will there be a change in demand for or access to health and social care services?	Yes/No	Yes/No

If there is a yes in any of the above follow a fuller assessment through the 9 criteria below

Full HIA Criteria	Policy A	Policy B
1. What are the direct impacts on health, mental health and wellbeing? (e.g. ill health, social exclusion, isolation, non-participation, safety)		
2. 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)		
3. What are the opportunities for self-improvement? (eg. ability to be physically active, choose healthy food, access to services/employment/education)		
4. What change in demand for services will there be? (e.g. Primary Care, hospital care, community services, mental health, social services)		
5. What impacts will there be on planetary health? (e.g. climate change mitigation)		
6. Who will it effect, and will there be particular impacts on certain vulnerable groups? (e.g. older people, young, disabled, low income)		
7. How will negative impacts be mitigated?		
8. How will positive impacts be enhanced?		
9. Recommendations for policy changes.		

5. APPRAISAL RESULTS AND OUTCOMES

- 5.0.1 Section 5 sums up the sustainability appraisal results, including summary tables, and summing up mitigation measures, synergistic and cumulative effects. Detailed appraisal results are contained in Appendix 2.
- 5.0.2 Each of the Plan policies, as well as alternative options, have been assessed against the SA Objectives in the Framework (see section 4.1).
- 5.0.3 The SA has assessed the effects of the emerging policies alongside their evolution. This has been necessary as a result of the iterative nature of the development of the plan, and policies undergoing editorial and presentational changes.

5.1 Assessment of Options and Policies

- 5.1.1 The detailed assessments of the development options leading to preferred policies are set out in Appendix 2, but these are summarised in the main SA report, within the following sections.
- 5.1.2 Overall summaries of the *policy* assessments are set out in the figures which follow in the following sections. The assessment of policies is structured by section or theme of the Local Plan, starting with the development strategy options and a justification for the preferred strategy, then the identified and potential sites following by the reminder of the development principles chapter. The rest of the assessment then follows the general order of policies in the draft Local Plan from the Green to the Core policies (Chapter 3 of the Local Plan) through to Heritage (chapter 12 of the Local Plan). Each section will first assess the development options and alternatives under each policy theme under the 20 SA objectives, then include a summary of the assessment for its synergistic and cumulative impacts. The final table under each section will assess each proposed policy for its health and wellbeing impacts under the HIA criteria.
- 5.1.3 It should be noted that, at this stage in the process, not all Local Plan policy options have yet progressed into a final draft *policy*, such as the affordable housing policy which requires additional viability work to consider the exact percentage requirements across the district.

- 5.1.4 All policy areas are summarised and presented below to allow comparisons to be made between policy areas. Also, presenting the outcomes alongside each other in this way helps demonstrate overall effects, as well as cumulative and synergistic effects. It is also a useful process tool to highlight any inconsistencies.
- 5.1.5 Negative effects do not necessarily indicate a failure in the plan or its policies. As highlighted in section 4.2, there are some inevitable tensions between SA framework objectives in terms of their compatibility. The process altogether is helpful in identifying any sustainability issues in relation to policies and improvements or mitigation that can be made.

5.2 Development Strategy

5.2.1 The following tables (Figures 11-12) provide the assessment of the consideration of spatial development options for the Rother development strategy, and then following this an assessment of sites. The Council considered in principle a number of options to determine the strategy and direction that should be taken in identifying development sites. The individual spatial development options form the alternative options that were considered as part of the development strategy and these have been assessed separately for their sustainability merits.

Figure 11 : Assessment of Development Strategy Options

Spatial Development Options	Description/Vision																				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
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	--	+	-	-	+	o	o	++	++	+	o	o	-	o	+	++	+	+	+	+	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	--	+	-	-	+	o	o	++	++	+	o	o	-	o	o	++	+	+	+	o	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.	--	+	-	-	+	o	o	++	++	++	+	o	-	o	o	+	++	+	++	o	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.	--	+	o	-	+	o	+	++	++	++	+	o	-	o	o	++	++	++	++	++	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.

Spatial Development Options	Description/Vision																				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
SDO4: Sustainable settlement extensions	Prioritise new development on the edge of sustainable settlements, providing major development and extending settlement boundaries where appropriate	--	+	-	-	+	o	o	++	++	++	o	o	-	o	o	++	+	+	+	o	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	--	+	-	-	+	o	o	++	++	++	o	o	-	o	o	++	++	+	+	o	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	--	++	o	-	++	o	o	+	++	++	o	o	-	o	++	++	++	+	+	+	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	--	+	-	-	+	o	o	++	++	++	+	o	-	o	-	++	++	o	+	o	7	Would create an environmental impact, but an opportunity to provide a sustainably planned settlement which is connected to the wider network of settlements.
SDO8: 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)	--	+	-	-	+	o	o	++	++	+	o	o	-	o	o	+	+	+	+	o	6	This option would exacerbate the current situation as growth would be proportional, would not necessarily proactively address sustainability issues.
SDO9: 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)	--	+	-	-	+	o	+	++	++	+	o	o	-	o	o	+	+	+	+	o	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	Focus development along the A21 within an identified corridor of settlements, with	--	+	-	-	+	o	o	++	++	++	o	o	-	o	o	++	++	+	++	-	9	A positive strategy to allow for development to directly access the A21

Spatial Development Options	Description/Vision	Sustainability Objectives																			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
sustainable transport corridors	opportunities for extensions. Provide opportunities for sustainable travel through enhanced bus services and cycling provision along this corridor.																						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	--	+	o	-	+	o	o	++	++	++	o	o	-	o	o	++	++	+	++	++	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	--	++	-	-	-	o	o	+	+	+	o	o	-	o	+	+	+	+	+	o	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 12 : Summary of 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
SDO3B: Bexhill Greenfield Growth Option 2: with New Multi-modal Transport Corridor	16	Yes – significant positive impact			<input checked="" type="checkbox"/>	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-modal 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

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
									settlements within radial development 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			<input checked="" type="checkbox"/>	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			<input checked="" type="checkbox"/>	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			<input checked="" type="checkbox"/>	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			<input checked="" type="checkbox"/>	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			<input checked="" type="checkbox"/>	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			<input checked="" type="checkbox"/>	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			<input checked="" type="checkbox"/>	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.

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
SDO2: Radial Settlement Network from the Main Urban areas of Bexhill and Hastings	7	No – not a significant impact			<input checked="" type="checkbox"/>	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.
SDO7: New Rural Settlements	7	No – not a significant impact			<input checked="" type="checkbox"/>	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.
SDO9: Proportional Growth by Settlement Form and Function	7	No – not a significant impact			<input checked="" type="checkbox"/>	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.
SDO8: Proportional Growth Across the District	6	No – not a significant impact			<input checked="" type="checkbox"/>	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.
SDO12: Development focused outside the AONB	4	No – not a significant impact		<input checked="" type="checkbox"/>		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.

Combination of Options to take forward as the Council's proposed development strategy:

5.2.2 The highest scoring options (including radial development) in the Sustainability appraisal will be brought together to form the Council's proposed development strategy for the Local Plan. The Council consider that the following combination of options is the most appropriate, and this is justified below and in the Development strategy background paper:

- 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, SDO12)
- Sustainable settlement growth, with focus along the A21 Corridor; (SDO4, SDO10)
- Hastings fringes urban growth (SDO5)
- Brownfield Intensification and Redevelopment. (SDO6)

Justification

5.2.3 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 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.

5.2.4 The proposed strategy will only be able to be delivered where physical development constraints allow and as such the sites that come forward under the proposed strategy will be directed by the development potential identified in the Council’s Draft Housing and Economic Land Availability Assessment (HELAA). The quantum of development which is appropriate for each settlement or area of built form will be directed by the sustainability assessment of each area as part of the Settlement Study, which assesses the form and function of each settlement and how sustainable a location it is to accept future growth, and any infrastructure that may need to be delivered to facilitate new growth. All sites that are identified as developable in the Draft HELAA will be put through the sustainability appraisal to assess the strength in sustainability of each site against the SA framework.

Assessment of Sites to form part of the Development Strategy

5.2.5 The Council has assessed around 1000 potential sites for their development potential through the Draft HELAA. The Draft HELAA provides the detailed justification for the deliverability of sites, but it is also important to assess the overall sustainability of sites proposed and alternative sites through the SA framework. This provides a tool to assess the relative merits of the sites that the Council consider can form part of its development strategy.

5.2.6 The Council consider the potential as ‘identified sites’ at this stage of the Local Plan and will progress these through to allocations at the next stage of the Local Plan. There are two tables which assess the Council’s identified sites: Figure 13 (Commitments and brought forward allocations), and Figure 14 (Newly identified as potential). A third table (Figure 15) has assessed sites which have been submitted through the HELAA Call for sites process which form the consideration of alternatives. Whilst the sites are available, the HELAA process has determined that these sites are not suitable or achievable, therefore are not considered developable. Assessing these sites against the SA framework, helps compare the sustainability merits of identified sites against these alternatives.

Figure 13 : Assessment of Identified Sites (Commitments and brought forward allocations) against the 20 SA Objectives

Planning Permission/ Site Allocation Reference	Site Name, Settlement	Parish	1 Air Quality	2 Biodiversity	3 Energy & Water Consumption	4 Energy & Water Consumption	5 Climate Change Adaptation	6 Climate Change Adaptation	7 Population, Health & Wellbeing	8 Population, Health & Wellbeing	9 Population, Health & Wellbeing	10 Population, Health & Wellbeing	11 Heritage	12 Land & Water Quality	13 Land & Water Quality	14 Land & Water Quality	15 Natural Landscape	16 Skills, Employment	17 Skills, Employment	18 Skills, Employment	19 Skills, Employment	20 Transport
RR/2022/2364/P, DaSA allocation Policy BEX3a	Kiteye Farm and adjoining land	Bexhill North	+	o	-	-	o	o	o	++	+	+	+	+	-	o	+	+	+	o	+	-
RR/2022/1584/P, DaSA allocation Policy BEX3b	Land west of Watermill Lane	Bexhill North	+	o	-	-	o	o	o	++	+	+	+	+	-	o	+	+	+	o	+	-

Planning Permission/ Site Allocation Reference	Site Name, Settlement	Parish	1 Air Quality	2 Biodiversity	3 Energy & Water Consumption	4 Energy & Water Consumption	5 Climate Change Adaptation	6 Climate Change Adaptation	7 Population, Health & Wellbeing	8 Population, Health & Wellbeing	9 Population, Health & Wellbeing	10 Population, Health & Wellbeing	11 Heritage	12 Land & Water Quality	13 Land & Water Quality	14 Land & Water Quality	15 Natural Landscape	16 Skills, Employment	17 Skills, Employment	18 Skills, Employment	19 Skills, Employment	20 Transport
DaSA allocation Policy BEX3c	Land east of Watermill Lane	Bexhill North	-	o	-	-	o	o	o	++	+	+	+	+	-	o	+	+	+	o	+	-
DaSA allocation Policy BEX6	Land adjacent to 276 Turkey Road, Bexhill	Bexhill North	--	+	-	-	o	o	o	++	+	+	+	+	-	o	+	+	+	o	+	-
RR/2023/1527/P, DaSA allocation Policy BEX7	Land at Moleynes Mead, Fryatts Way, Bexhill	Bexhill North	--	+	-	-	o	o	o	++	+	+	+	+	-	o	+	+	+	o	+	-
RR/2018/2790/P, DaSA allocation Policy BEX1	Land at Levetts Wood and Oaktree Farm, Sidley, Bexhill	Bexhill North	--	o	-	-	o	o	o	++	+	+	o	+	-	o	+	+	+	o	+	-
RR/2017/963/P	Bexhill Enterprise Park – Escarpment Site B – south of Glovers End, Bexhill	Bexhill North	--	o	-	-	o	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
RR/2022/1233/P	Cemetery Lodge, 250 Turkey Road, Bexhill	Bexhill North	--	o	-	-	o	o	o	++	+	+	o	+	-	o	+	+	+	o	+	-
RR/2021/2545/P	Land west of Watermill Lane, Bexhill	Bexhill North	--	o	-	-	o	o	o	++	+	+	+	+	-	o	+	+	+	o	+	-
RR/2015/1760/P	Worsham Farm Site B, Land West of Mount View Street	Bexhill North	--	o	-	-	o	o	o	++	+	+	+	+	-	o	+	+	+	o	+	-
RR/2015/1760/P	Worsham Farm Site D, Land East of Mount View Street	Bexhill North	--	o	-	-	o	o	o	++	+	+	+	+	-	o	+	+	+	o	+	-
RR/2015/1760/P	Worsham Farm Site E, Land South of Worsham Lane	Bexhill North	--	o	-	-	o	o	o	++	+	+	+	+	-	o	+	+	+	o	+	-
RR/2022/2719/P	Ardath House, Hastings Road, Bexhill, TN40 2HJ	Bexhill North	--	+	-	-	o	o	o	++	+	+	+	+	-	o	+	+	+	o	+	-
RR/2017/1705/P, DaSA allocation Policy BEX9	Land off Spindlewood Drive, Bexhill	Bexhill West	--	o	-	-	o	o	o	++	+	+	o	+	-	o	+	+	+	o	+	-
RR/2020/1410/P	Land south of Barnhorn Road & West of Ashridge Court, Barnhorn Road, Bexhill on Sea	Bexhill West	--	+	-	-	o	o	o	++	+	+	+	+	-	o	+	+	+	o	+	-
RR/2020/2260/P	Land at Clavering Walk, Bexhill on Sea	Bexhill West	--	o	-	-	o	o	o	++	+	+	o	+	-	o	+	+	+	o	+	-
RR/2022/3018/P	Land at Barnhorn Green, Bexhill on Sea	Bexhill West	--	o	-	-	o	o	o	++	+	+	o	+	-	o	+	+	+	o	+	-
RR/2023/926/P	Barn at Beeches Farm, Sandhurst Lane, Bexhill	Bexhill West	--	+	-	-	o	o	o	++	+	+	o	+	-	o	+	+	+	o	+	-
RR/2021/1519/P	81 Cooden Drive, Bexhill	Bexhill West	--	+	-	-	o	o	o	++	+	+	+	+	-	o	+	+	+	o	+	-
RR/2021/1621/P	49 Cooden Sea Road, Cooden	Bexhill West	--	o	-	-	o	o	o	++	+	+	+	+	-	o	+	+	+	o	+	-

Planning Permission/ Site Allocation Reference	Site Name, Settlement	Parish	1 Air Quality	2 Biodiversity	3 Energy & Water Consumption	4 Energy & Water Consumption	5 Climate Change Adaptation	6 Climate Change Adaptation	7 Population, Health & Wellbeing	8 Population, Health & Wellbeing	9 Population, Health & Wellbeing	10 Population, Health & Wellbeing	11 Heritage	12 Land & Water Quality	13 Land & Water Quality	14 Land & Water Quality	15 Natural Landscape	16 Skills, Employment	17 Skills, Employment	18 Skills, Employment	19 Skills, Employment	20 Transport
RR/2022/2570/P	41A, 41 & 43 Barnhorn Road, Bexhill	Bexhill West	-	+	-	-	o	o	o	++	+	+	+	+	-	o	+	+	+	o	+	-
DaSA allocation Policy BEX14	Land south-east of Beeching Road, Bexhill	Bexhill Urban	--	+	-	-	o	o	o	++	+	+	+	+	-	o	+	+	+	o	+	-
DaSA allocation Policy BEX8	Land south of Terminus Road	Bexhill Urban	--	+	-	-	o	o	o	++	+	+	+	+	-	o	+	+	+	o	+	-
RR/2020/155/P	2a Sackville Road	Bexhill Urban	--	+	-	-	o	o	o	++	+	+	o	+	-	o	+	+	+	o	+	-
RR/2019/430/P, DaSA allocation Policy BEX4	Land at Former High School Site, Down Road, Bexhill	Bexhill Urban	--	+	-	-	o	o	o	++	+	+	o	+	-	o	+	+	+	o	+	-
RR/2020/577/P	30 Dorset Road, Bexhill	Bexhill Urban	--	+	-	-	+	o	o	++	+	+	+	+	-	o	+	+	+	o	+	-
RR/2021/1656/P	Land west of Fryatts Way, Bexhill	Bexhill Urban	--	o	-	-	+	o	o	++	+	+	+	+	-	o	+	+	+	o	+	-
Crowhurst Neighbourhood Plan allocation CH1	Land at Station Road/Forewood Lane, Crowhurst	Crowhurst	--	+	-	-	+	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
Crowhurst Neighbourhood Plan allocation CH3	Land adjacent to Station Car Park, Crowhurst	Crowhurst	--	+	-	-	+	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
Crowhurst Neighbourhood Plan allocation CH2	Land south of Forewood Rise, Crowhurst	Crowhurst	--	+	-	-	+	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
DaSA allocation Policy FAC2	Land east of Waites Lane, Fairlight Cove	Fairlight	--	o	-	-	o	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
DaSA allocation Policy HAS3	Land north of A265, Ivyhouse Lane, Hastings	Guestling	--	o	-	-	o	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
RR/2017/1829/P	Land at Burgess Road, Ivyhouse Lane Industrial Estate, Hastings	Guestling	--	o	-	-	o	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
DaSA allocation Policy HAS2	Land at Michael Tyler Furniture, Woodlands Way, Hastings	Westfield	--	o	-	-	o	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
DaSA allocation Policy WES2	Land at the former Moorhurst Care Home, Westfield	Westfield	--	+	-	-	o	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
DaSA allocation Policy WES3	Land south-east of Goulds Drive, Westfield	Westfield	--	o	-	-	o	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
RR/2020/2307/P	Land at Blackfriars, Battle	Battle	--	+	-	-	o	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-

Planning Permission/ Site Allocation Reference	Site Name, Settlement	Parish	1 Air Quality	2 Biodiversity	3 Energy & Water Consumption	4 Energy & Water Consumption	5 Climate Change Adaptation	6 Climate Change Adaptation	7 Population, Health & Wellbeing	8 Population, Health & Wellbeing	9 Population, Health & Wellbeing	10 Population, Health & Wellbeing	11 Heritage	12 Land & Water Quality	13 Land & Water Quality	14 Land & Water Quality	15 Natural Landscape	16 Skills, Employment	17 Skills, Employment	18 Skills, Employment	19 Skills, Employment	20 Transport
RR/2021/1754/P	Land at Whitelands Cottage, North Trade Road, Battle	Battle	-	+	-	-	+	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
RR/2022/1765/P	Beech Farm, Battle	Battle	-	+	-	-	o	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
Battle Neighbourhood Plan allocation site NE05	Swallow Barn, Netherfield	Battle	-	+	-	-	+	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
Battle Neighbourhood Plan allocation site NE06a	White House Poultry Farm, Netherfield	Battle	-	o	-	-	+	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
Battle Neighbourhood Plan allocation site BA36a	Land at Calbec House, Calbec Hill, Battle	Battle	-	+	-	-	+	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
Battle Neighbourhood Plan allocation site BA31a	Land to the east of Glengorse, Battle	Battle	-	+	-	-	o	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
DaSA allocation Policy CAT1	Land west of B2204, Catsfield	Catsfield	-	o	-	-	o	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
Sedlescombe Neighbourhood Plan allocation Policy 2	Land at Sunningdale	Sedlescombe	-	o	-	-	o	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
Sedlescombe Neighbourhood Plan allocation Policy 4	Land at Church Hill Farm, North of Village Hall	Sedlescombe	-	o	-	-	o	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
Sedlescombe Neighbourhood Plan allocation Policy 5	Land at Sedlescombe Sawmills	Sedlescombe	-	o	-	-	o	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
Sedlescombe Neighbourhood Plan allocation Policy 6	Land adjacent to St John the Baptist Church	Sedlescombe	-	+	-	-	o	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
Sedlescombe Neighbourhood Plan allocation Policy 7	Land at Gate Cottage	Sedlescombe	-	+	-	-	o	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
Sedlescombe Neighbourhood Plan allocation Policy 8	Land at Church Hill Farm	Sedlescombe	-	+	-	-	o	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
RR/2022/2619/P	Street Farm, Sedlescombe	Sedlescombe	-	o	-	-	+	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
RR/2006/3467/P	Marley Lane Business Park, Marley Lane, Battle	Sedlescombe	-	o	-	-	+	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
DaSA allocation Policy MAR1	Land at Felon's Field, Marley Lane	Sedlescombe	-	o	-	-	o	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-

Planning Permission/ Site Allocation Reference	Site Name, Settlement	Parish	1 Air Quality	2 Biodiversity	3 Energy & Water Consumption	4 Energy & Water Consumption	5 Climate Change Adaptation	6 Climate Change Adaptation	7 Population, Health & Wellbeing	8 Population, Health & Wellbeing	9 Population, Health & Wellbeing	10 Population, Health & Wellbeing	11 Heritage	12 Land & Water Quality	13 Land & Water Quality	14 Land & Water Quality	15 Natural Landscape	16 Skills, Employment	17 Skills, Employment	18 Skills, Employment	19 Skills, Employment	20 Transport
Rye Neighbourhood Plan allocation Policy H3	Former Tilling Green School	Rye	-	o	-	-	o	o	o	++	+	+	+	+	-	o	+	+	+	o	+	-
Rye Neighbourhood Plan allocation Policy H5	Winchelsea Road (East Side)	Rye	-	o	-	-	o	o	o	++	+	+	o	+	-	o	+	+	+	o	+	-
Rye Neighbourhood Plan allocation Policy H6	Winchelsea Road (West Side)	Rye	-	o	-	-	o	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
Rye Neighbourhood Plan allocation Policy H7	Rye Creative Centre (Former Freda Gardham School Site), New Road, Rye	Rye	-	o	-	-	o	o	o	++	+	+	o	+	-	o	+	+	+	o	+	-
Rye Neighbourhood Plan allocation Policy H4	Rock Channel Site A - Rye	Rye	-	o	-	-	o	o	o	++	+	+	o	+	-	o	+	+	+	o	+	-
Rye Neighbourhood Plan allocation Policy H8	Former Lower School Site, off Ferry Road, Rye	Rye	-	o	-	-	o	o	o	++	+	+	o	+	-	o	+	+	+	o	+	-
Rye Neighbourhood Plan allocation Policy B3	Land between 11 and 23 New Road, Rye	Rye	-	o	-	-	o	o	o	++	+	+	o	+	-	o	+	+	+	o	+	-
RR/2017/2217/P	17 - 19 Tower Street, Rye	Rye	-	+	-	-	o	o	o	++	+	+	o	+	-	o	+	+	+	o	+	-
RR/2017/2097/P	Land south-west of Rye Hospital, Rye Road	Rye Foreign	-	o	-	-	+	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
DaSA allocation Policy RHA1	Land at Stoneworks Cottages, Rye Harbour	Icklesham	-	o	-	-	o	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
RR/2018/905/P, RR/2018/925/P, RR/2019/1841/P	Old Mears, Harbour Road, Rye Harbour	Icklesham	-	o	-	-	o	o	o	++	+	+	+	+	-	o	+	+	+	o	+	-
RR/2019/2850/P	Land at Churchfields Industrial Estate, Harbour Road, Rye Harbour	Icklesham	-	o	-	-	o	o	o	++	+	+	+	+	-	o	+	+	+	o	+	-
RR/2022/1157/P	The Atlas Business Park, Harbour Road, Rye Harbour	Icklesham	-	o	-	-	o	o	o	++	+	+	+	+	-	o	+	+	+	o	+	-
RR/2022/625/P	The Saltings - Site B, Harbour Road	Icklesham	-	o	-	-	o	o	o	++	+	+	+	+	-	o	+	+	+	o	+	-
DaSA allocation Policy IDE1	Land south of Elmsmead, Iden	Iden	-	o	-	-	o	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
DaSA allocation Policy PEA1	Land south of Main Street, Peasmarsh	Peasmarsh	-	o	-	-	o	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
DaSA allocation Policy NOR1	Land south of Northiam Church of England Primary School, Northiam	Northiam	-	o	-	-	o	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-

Planning Permission/ Site Allocation Reference	Site Name, Settlement	Parish	1 Air Quality	2 Biodiversity	3 Energy & Water Consumption	4 Energy & Water Consumption	5 Climate Change Adaptation	6 Climate Change Adaptation	7 Population, Health & Wellbeing	8 Population, Health & Wellbeing	9 Population, Health & Wellbeing	10 Population, Health & Wellbeing	11 Heritage	12 Land & Water Quality	13 Land & Water Quality	14 Land & Water Quality	15 Natural Landscape	16 Skills, Employment	17 Skills, Employment	18 Skills, Employment	19 Skills, Employment	20 Transport
DaSA allocation Policy BEC2	Land South of Buddens Green, Beckley Four Oaks	Beckley	-	+	-	-	o	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
DaSA allocation Policy BEC1	Land East of Hobbs Lane, Beckley, Four Oaks, East Sussex	Beckley	-	o	-	-	o	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
DaSA allocation Policy BRO1	Land west of the A28, Northiam Road, Broad Oak	Brede	--	o	-	-	o	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
DaSA allocation Policy BRO2	Land south of the Broad Oak public house, Broad Oak	Brede	--	+	-	-	o	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
RR/2021/2947/P DaSA allocation Policy CAM1	Land at the Former Putting Green Site, Old Lydd Road, Camber	Camber	--	o	-	-	o	o	o	++	+	+	+	+	-	o	+	+	+	o	+	-
DaSA allocation Policy CAM2	Land at the Central Car Park, Old Lydd Road, Camber	Camber	--	o	-	-	o	o	o	++	+	+	o	+	-	o	+	+	+	o	+	-
RR/2018/480/P	Coldharbour Farm Estate, Battle Road, Brightling	Brightling	--	+	-	-	o	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
RR/2017/582/P, Rother Local Plan allocation Policy VL1	Land South West of Strand Meadow, Burwash	Burwash	--	+	-	-	o	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
RR/2021/1608/P	Ashwood Nursing Home, Fir Tree Bank	Burwash	--	+	-	-	+	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
RR/2021/431/P	Oakleys Garage, Burwash	Burwash	--	+	-	-	+	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
RR/2021/825/P	Land at Compass Park, Junction Road, Ewhurst	Ewhurst	--	o	-	-	o	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
RR/2021/2798/P	Land South of Lodge Farm, Hurst Green	Hurst Green	--	o	-	-	+	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
Salehurst and Robertsbridge Neighbourhood Plan allocation Policy HO2	Land to the south east of Heathfield Gardens, Robertsbridge	Salehurst & Robertsbridge	--	+	-	-	+	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
Salehurst and Robertsbridge Neighbourhood Plan allocation Policy HO2	Vicarage Land, Land south of the western end of Fair Lane, Robertsbridge	Salehurst & Robertsbridge	--	+	-	-	+	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
RR/2017/382/P, Salehurst and Robertsbridge Neighbourhood Plan allocation Policy HO2	Hodson's Mill, Northbridge Street, Robertsbridge	Salehurst & Robertsbridge	--	+	-	-	+	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-

Planning Permission/ Site Allocation Reference	Site Name, Settlement	Parish	1 Air Quality	2 Biodiversity	3 Energy & Water Consumption	4 Energy & Water Consumption	5 Climate Change Adaptation	6 Climate Change Adaptation	7 Population, Health & Wellbeing	8 Population, Health & Wellbeing	9 Population, Health & Wellbeing	10 Population, Health & Wellbeing	11 Heritage	12 Land & Water Quality	13 Land & Water Quality	14 Land & Water Quality	15 Natural Landscape	16 Skills, Employment	17 Skills, Employment	18 Skills, Employment	19 Skills, Employment	20 Transport
RR/2022/1850/P, RR/2022/283/P Salehurst and Robertsbridge Neighbourhood Plan allocation Policy HO2	Grove Farm, Robertsbridge, Site A	Salehurst & Robertsbridge	-	+	-	-	+	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
Ticehurst Neighbourhood Plan allocation Policy H2	Orchard Farm, Ticehurst Village	Ticehurst	--	o	-	-	o	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
Ticehurst Neighbourhood Plan allocation Policy H2	Singehurst, Pashley Road, Ticehurst Village	Ticehurst	--	o	-	-	+	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
Ticehurst Neighbourhood Plan allocation Policy H2	Wardsdown House, Flimwell	Ticehurst	--	o	-	-	+	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-

Summary for all Sites

5.2.7 All sites that have been identified above are sites with planning permission or are allocated for development. The principle of development is confirmed and as such the overall sustainability and suitability of development is considered appropriate. All sites will have varying degrees of constraints and sustainability impacts and these are discussed in more detail below. The sustainability analysis provides a comparative assessment of the sustainability merits of each sites but does not influence the decision about whether sites form part of the development strategy. With regards to allocated sites, the HELAA process has determined whether they are still available for development and can be carried forward for consideration in the Local Plan.

Sustainability Impacts

5.2.8 All new residential development will inevitably have a negative impact on reducing air pollution, and reducing greenhouse gases, it will also not be able to minimise water consumption as it will add to additional water demands. This is also the case for minimising waste and recycling which cannot be guaranteed through construction or operation. Road congestion will not be able to be alleviated, but the development strategy in general, rather than individual development sites will be able to assist in providing opportunities for a modal shift in travel choice and less dependency on the car for general travel.

5.2.9 Biodiversity improvements can be provided through associated BNG so are positive impacts, along with providing opportunities for everyone to live in a suitable home for their needs, improved access to employment opportunities and education. The impacts which are generally neutral include: waste and recycling, risk of pollution, ensuring parks and gardens are protected, overall health and wellbeing, poverty and social exclusion and the risk to coastal erosion. The objectives that will generally differ for each site will be the impacts on flood risk and climate change as well as the impact on the historic environment and landscape of the countryside. These will be picked up specifically in the sustainability assessment above.

Conclusions

5.2.10 There are no identified sustainability impacts which prevent the sites forming an appropriate part of the Local Plan's development strategy.

Figure 14 : Assessment of Potential Additional Sites against the 20 SA Objectives

HELAA Reference	Site Name, Settlement	Parish	1 Air Quality	2 Biodiversity	3 Energy & Water Consumption	4 Energy & Water Consumption	5 Climate Change Adaptation	6 Climate Change Adaptation	7 Population, Health & Wellbeing	8 Population, Health & Wellbeing	9 Population, Health & Wellbeing	10 Population, Health & Wellbeing	11 Heritage	12 Land & Water Quality	13 Land & Water Quality	14 Land & Water Quality	15 Natural Landscape	16 Skills, Employment	17 Skills, Employment	18 Skills, Employment	19 Skills, Employment	20 Transport
BAT0002	Land north of Sunny Rise, North Trade Road, Battle	Battle	--	o	-	-	o	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
BAT0014	Land at Almonry Farm, North Trade Road, Battle	Battle	--	o	-	-	o	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
BAT0020	Glengorse, Battle	Battle	--	o	-	-	o	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
BAT0083	Land at 1 Loose Farm Cottages, Hastings Road, Battle	Battle	--	+	-	-	o	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
BAT0085	Land north of Glengorse Estate, Battle	Battle	--	o	-	-	o	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
BAT0111	Land north west of Glengorse	Battle	--	o	-	-	o	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
BAT0116	Maryland Boarding School, Hastings Road, Battle	Battle	--	o	-	-	o	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
BAT0118	Land south of Battle Hill, Battle	Battle	--	+	-	-	+	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
BEC0011	Land west of Oakley Cottages, Main Street, Beckley	Beckley	--	+	-	-	o	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
BEC0021	Land east of Village Hall, Main Street, Beckley	Beckley	--	o	-	-	o	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
BRE0028	The Coppice, Northiam Road, Broad Oak, Rye, East Sussex	Brede	--	o	-	-	o	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
BRE0030	Birchwood, Northiam Road, Broad Oak	Brede	--	o	-	-	o	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
BRE0035	Land at Broad Oak Lodge, Chitcombe Road	Brede	--	o	-	-	+	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
BRE0045	Land east of Pottery Close, Brede	Brede	--	o	-	-	o	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
BUR0020	The Nutrition Centre (Higher Nature), Goodsoal Lane, Burwash Common	Burwash	--	+	-	-	o	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
BUR0027	Land south of Heathfield Road, Burwash Common	Burwash	--	+	-	-	+	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
BUR0035	Pippins, High Street, Burwash, TN19 7HH	Burwash	--	o	-	-	+	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-

HELAA Reference	Site Name, Settlement	Parish	1 Air Quality	2 Biodiversity	3 Energy & Water Consumption	4 Energy & Water Consumption	5 Climate Change Adaptation	6 Climate Change Adaptation	7 Population, Health & Wellbeing	8 Population, Health & Wellbeing	9 Population, Health & Wellbeing	10 Population, Health & Wellbeing	11 Heritage	12 Land & Water Quality	13 Land & Water Quality	14 Land & Water Quality	15 Natural Landscape	16 Skills, Employment	17 Skills, Employment	18 Skills, Employment	19 Skills, Employment	20 Transport
CAT0016	Land at Wilton House Equestrian Centre, Broomham Bungalow, Catsfield	Catsfield	-	o	-	-	o	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
CAT0029	Land south of Church Road, Catsfield	Catsfield	--	+	-	-	o	o	o	++	+	+	o	+	-	o	+	+	+	o	+	-
CRO0009	Land at Station Road/Forewood Lane, Crowhurst	Crowhurst	--	o	-	-	o	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
ETC0003	Land rear of Oxenbridge Row, Etchingham	Etchingham	--	+	-	-	o	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
ETC0016	Land at Church Lane, Etchingham	Etchingham	--	+	-	-	o	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
ETC0020	Land at Oxenbridge Lane, Etchingham	Etchingham	--	+	-	-	o	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
EWH0010	Land east of Stockwood Meadow, Northiam Road, Staplecross	Ewhurst	--	+	-	-	+	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
EWH0011	Land at Ockham Farm, Dagg Lane, Ewhurst Green	Ewhurst	--	+	-	-	+	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
FAI0001	Land east of Waites Lane, Fairlight Cove	Fairlight	--	o	-	-	o	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
GUE0012	Land at Wild Meadows, Chapel Lane, Guestling Green	Guestling	--	o	-	-	+	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
HAF0026	Brackendale, Rock Lane, Hastings	Guestling	--	o	-	-	o	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
HUG0001	Land adjacent to Pentwood Place, London Road, Hurst Green	Hurst Green	--	+	-	-	+	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
HUG0016	Burgh Hill, Hurst Green	Hurst Green	--	+	-	-	o	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
HUG0021	Land south of Iridge Place, London Road, Hurst Green	Hurst Green	--	o	-	-	o	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
ICK0006	The Saltings - site A, Harbour Road	Icklesham	--	o	-	-	o	o	o	++	+	+	+	+	-	o	+	+	+	o	+	-
ICK0028	Weslake Industrial Estate, Rye Harbour Road, Rye Harbour	Icklesham	--	o	-	-	o	o	o	++	+	+	+	+	-	o	+	+	+	o	+	-
ICK0041	Land west of Orchard Close, A259, Icklesham	Icklesham	--	o	-	-	o	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-

HELAA Reference	Site Name, Settlement	Parish	1 Air Quality	2 Biodiversity	3 Energy & Water Consumption	4 Energy & Water Consumption	5 Climate Change Adaptation	6 Climate Change Adaptation	7 Population, Health & Wellbeing	8 Population, Health & Wellbeing	9 Population, Health & Wellbeing	10 Population, Health & Wellbeing	11 Heritage	12 Land & Water Quality	13 Land & Water Quality	14 Land & Water Quality	15 Natural Landscape	16 Skills, Employment	17 Skills, Employment	18 Skills, Employment	19 Skills, Employment	20 Transport
ICK0045	The Atlas Business Park, Harbour Road, Rye Harbour	Icklesham	-	o	-	-	o	o	o	++	+	+	+	+	-	o	+	+	+	o	+	-
IDE0010	Street Field, Main Street, Iden	Iden	-	o	-	-	+	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
IDE0011	Land rear of Conkers, Main Street	Iden	-	o	-	-	o	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
PEA0001	Oaklands, Main Street, Peasmarsh, East Sussex	Peasmarsh	-	o	-	-	+	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
PEA0029	Units 1-6, Malthouse Business Park, Peasmarsh	Peasmarsh	-	o	-	-	+	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
PEA0031	Land west of Woodside, Main Street, Peasmarsh	Peasmarsh	-	o	-	-	o	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
PEA0032	Land north of Flackley ash Hotel, Mackerel Hill, Peasmarsh	Peasmarsh	-	+	-	-	+	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
PEA0033	Land east of Orchard Way, Peasmarsh	Peasmarsh	-	+	-	-	o	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
PEA0034	Land adjacent to Cornerways, School Lane, Peasmarsh	Peasmarsh	-	o	-	-	+	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
PEA0035	Tanhouse Site B - east, Tanhouse Lane, Peasmarsh	Peasmarsh	-	+	-	-	o	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
PLA0012	Land south of Poppyfields - western field, Houghton Green Lane, Playden	Playden	-	+	-	-	o	o	o	++	+	+	o	+	-	o	+	+	+	o	+	-
RYE0015	Former Council Depot, Cyprus Place	Rye	-	o	-	-	o	o	o	++	+	+	o	+	-	o	+	+	+	o	+	-
RYE0040	Slade Yard, St Margaret's Terrace, Rye	Rye	-	o	-	-	o	o	o	++	+	+	o	+	-	o	+	+	+	o	+	-
SAL0005	Culverwells, Land north of Station Road, Robertsbridge	Salehurst & Robertsbridge	-	o	-	-	o	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
SAL0012	Land at Bishops Lane, Robertsbridge	Salehurst & Robertsbridge	-	+	-	-	o	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
SAL0022	Land at Grove Farm (Phase 2), west of Robertsbridge Bypass, Robertsbridge	Salehurst & Robertsbridge	-	+	-	-	+	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
SAL0028	Land south-east of Heathfield Gardens, Robertsbridge	Salehurst & Robertsbridge	-	+	-	-	o	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-

HELAA Reference	Site Name, Settlement	Parish	1 Air Quality	2 Biodiversity	3 Energy & Water Consumption	4 Energy & Water Consumption	5 Climate Change Adaptation	6 Climate Change Adaptation	7 Population, Health & Wellbeing	8 Population, Health & Wellbeing	9 Population, Health & Wellbeing	10 Population, Health & Wellbeing	11 Heritage	12 Land & Water Quality	13 Land & Water Quality	14 Land & Water Quality	15 Natural Landscape	16 Skills, Employment	17 Skills, Employment	18 Skills, Employment	19 Skills, Employment	20 Transport
SAL0029	Land south-west of Heathfield Gardens, Robertsbridge	Salehurst & Robertsbridge	-	o	-	-	o	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
SED0020	Land north of Gorselands, Sedlescombe	Sedlescombe	-	o	-	-	o	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
TIC0027	Land rear of Fruitfields, High Street, Flimwell	Ticehurst	-	o	-	-	o	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
TIC0029	Junction of London Road and A268 (North)	Ticehurst	-	o	-	-	o	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
TIC0030	Junction of London Road and A268 (South)	Ticehurst	-	o	-	-	o	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
TIC0043	Land at Cherry Tree Field, Ticehurst	Ticehurst	-	o	-	-	o	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
TIC0044	Land at Steellands Farm, Ticehurst	Ticehurst	-	o	-	-	o	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
TIC0008	Flimwell East Broad Location, Flimwell	Ticehurst	-	o	-	-	o	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
WES0021	Moor Farm, Westfield	Westfield	-	+	-	-	o	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
WES0040	Land on east side of Cottage Lane, Westfield	Westfield	-	+	-	-	+	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
BEX0158	Land west of Pages Lane, Bexhill on Sea	Bexhill Central	-	o	-	-	o	o	o	++	+	+	+	+	-	o	+	+	+	o	+	-
BEX0189	1 Wellington Place and 3-15 Terminus Road, Bexhill-on-Sea	Bexhill Central	-	+	-	-	o	o	o	++	+	+	o	+	-	o	+	+	+	o	+	-
BEX0201	Rear of 11 Endwell Road, Bexhill	Bexhill Central	-	o	-	-	o	o	o	++	+	+	o	+	-	o	+	+	+	o	+	-
BEX0050	Land south of Barnhorn Road	Bexhill W	-	o	-	-	o	o	o	++	+	+	+	+	-	o	+	+	+	o	+	-
BEX0129	Pond Field, Sandhurst Lane, Bexhill	Bexhill W	-	o	-	-	o	o	o	++	+	+	+	+	-	o	+	+	+	o	+	-
BEX0159	Land north of Rosewood Park, Gotham Farm, Bexhill-on-Sea	Bexhill W	-	o	-	-	o	o	o	++	+	+	+	+	-	o	+	+	+	o	+	-
BEX0160	Land east of Fantails, Sandhurst Lane, Bexhill	Bexhill W	-	+	-	-	o	o	o	++	+	+	+	+	-	o	+	+	+	o	+	-
BEX0182	Land at Barnhorn Road and Coneyburrow Lane, Bexhill	Bexhill W	-	o	-	-	o	o	o	++	+	+	+	+	-	o	+	+	+	o	+	-
BEX0032	Former Sidley Sports Ground, Glovers Lane	Bexhill NE	-	o	-	-	o	o	o	++	+	+	o	+	-	o	+	+	+	o	+	-

HELAA Reference	Site Name, Settlement	Parish	1 Air Quality	2 Biodiversity	3 Energy & Water Consumption	4 Energy & Water Consumption	5 Climate Change Adaptation	6 Climate Change Adaptation	7 Population, Health & Wellbeing	8 Population, Health & Wellbeing	9 Population, Health & Wellbeing	10 Population, Health & Wellbeing	11 Heritage	12 Land & Water Quality	13 Land & Water Quality	14 Land & Water Quality	15 Natural Landscape	16 Skills, Employment	17 Skills, Employment	18 Skills, Employment	19 Skills, Employment	20 Transport
BEX0112	Land on the north side of Turkey Road, Bexhill, East Sussex	Bexhill NE	-	o	-	-	o	o	o	++	+	+	+	+	-	o	+	+	+	o	+	-
BEX0113	Chestnut Meadow Camping and Caravan Park, Ninfield Road, Bexhill-on-Sea, East Sussex	Bexhill NE	--	o	-	-	o	o	o	++	+	+	+	+	-	o	+	+	+	o	+	-
BEX0072	Ninfield Road, Havenrook Avenue Broad Location, Bexhill	Bexhill NE	--	o	-	-	o	o	o	++	+	+	o	+	-	o	+	+	+	o	+	-
BEX0132	Land at High House Farm, Ninfield Road, Bexhill	Bexhill NE	--	o	-	-	o	o	o	++	+	+	o	+	-	o	+	+	+	o	+	-
BEX0204	Land at Scallets Wood House, St Mary's Lane, Bexhill-on-Sea	Bexhill NE	--	o	-	-	o	o	o	++	+	+	+	+	-	o	+	+	+	o	+	-

Summary for all Sites

5.2.11 All sites that have been identified above are sites that are considered potentially developable within the Council's Draft HELAA. The overall sustainability of sites is considered appropriate to be carried forward, but their overall developability is to be confirmed at the next stage of the Local Plan. All sites will have varying degrees of constraints and sustainability impacts and these are discussed in more detail below. The sustainability analysis provides a comparative assessment of the sustainability merits of each site but does not influence the decision about whether sites form part of the development strategy. Site availability will be confirmed as part of the formal consultation on the Local Plan, and such sites may be considered as allocations at the next stage of the plan making process.

Sustainability Impacts

5.2.12 All new residential development will inevitably have a negative impact on reducing air pollution, and reducing greenhouse gases, it will also not be able to minimise water consumption as it will add to additional water demands. This is also the case for minimising waste and recycling which cannot be guaranteed through construction or operation. Road congestion will not be able to be alleviated, but the development strategy in general, rather than individual development sites will be able to assist in providing opportunities for a modal shift in travel choice and less dependency on the car for general travel.

5.2.13 Biodiversity improvements can be provided through associated BNG so are positive impacts, especially where there are Biodiversity Opportunity Areas along with providing opportunities for everyone to live in a suitable home for their needs, improved access to employment opportunities and education. The impacts which are generally neutral include: waste and recycling, risk of pollution, ensuring parks and gardens are protected, overall health and wellbeing, poverty and social exclusion and the risk to coastal erosion.

5.2.14 The objectives that will generally differ for each site will be the impacts on flood risk and climate change as well as the impact on the historic environment and landscape of the countryside. These will be picked up specifically in the sustainability assessment above. Where sites have a neutral impact on Objective 5 – it is likely that flood mitigation measures will be required for all or part of the site, Where sites score neutrally in Objective 2 – it is likely that priority habitats exist adjoining or near to the sites and as such mitigation will be required through BNG and other measures. Where sites have a neutral

impact on Objective 11 – consideration will need to be given to the setting of listed buildings or other built heritage. Where sites have a neutral impact on Objective 15 – the site will be located within the High Weald national landscape and therefore design and impact on setting will be a major consideration which impacts the quantum, layout and scale of development on the site.

Conclusions

5.2.15 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.

Figure 15 : Assessment of Rejected Submitted Sites (Sites submitted but assessed as not developable) against the 20 SA Objectives

HELAA Reference	Site Name, Settlement	Parish	1 Air Quality	2 Biodiversity	3 Energy & Water Consumption	4 Energy & Water Consumption	5 Climate Change Adaptation	6 Climate Change Adaptation	7 Population, Health & Wellbeing	8 Population, Health & Wellbeing	9 Population, Health & Wellbeing	10 Population, Health & Wellbeing	11 Heritage	12 Land & Water Quality	13 Land & Water Quality	14 Land & Water Quality	15 Natural Landscape	16 Skills, Employment	17 Skills, Employment	18 Skills, Employment	19 Skills, Employment	20 Transport
ASH0005	Street Farm, Brownbread Street, Ashburnham	Ashburnham	--	o	-	-	o	o	o	++	+	+	o	+	-	o	--	+	+	o	+	-
BAT0009	Hughs' Field, Land opposite Caldbec House, Caldbec Hill, Battle	Battle	--	o	-	-	+	o	o	++	+	+	o	+	-	o	--	+	+	o	+	-
BAT0013	Land adjacent to Frederick Thatcher Place, North Trade Road	Battle	--	--	-	-	o	o	o	++	+	+	--	+	-	o	o	+	+	o	+	-
BAT0046	Telham Field, Land south of Hastings Road, Battle	Battle	--	+	-	-	o	o	o	++	+	+	+	+	-	o	--	+	+	o	+	-
BAT0048	Caldbec House South Field, Caldbec Hill	Battle	--	+	-	-	+	o	o	++	+	+	--	+	-	o	--	+	+	o	+	-
BAT0069	Land Adjoining Little Brans, 124 Hastings Road, Battle	Battle	--	o	-	-	+	o	o	++	+	+	o	+	-	o	--	+	+	o	+	-
BAT0072	Rosecourt, London Road, Battle	Battle	--	o	-	-	+	o	o	++	+	+	--	+	-	o	--	+	+	o	+	-
BAT0073	Land south of Virgins Lane, Battle	Battle	--	o	-	-	o	o	o	++	+	+	o	+	-	o	--	+	+	o	+	-
BAT0074	Black Firs Farm, London Road, Battle	Battle	--	o	-	-	o	o	o	++	+	+	+	+	-	o	--	+	+	o	+	-
BAT0075	Land adjacent to Whitelands, Mile Oak Wood, North Trade Road, Battle	Battle	--	--	-	-	+	o	o	++	+	+	+	+	-	o	--	+	+	o	+	-
BAT0076	Land to the East of Battle	Battle	--	+	-	-	o	o	o	++	+	+	--	+	-	o	--	+	+	o	+	-
BAT0077	Mount Street Car Park - Land at & to rear of, Battle	Battle	--	o	-	-	+	o	o	++	+	+	-	+	-	o	--	+	+	o	+	-

HELAA Reference	Site Name, Settlement	Parish	1 Air Quality	2 Biodiversity	3 Energy & Water Consumption	4 Energy & Water Consumption	5 Climate Change Adaptation	6 Climate Change Adaptation	7 Population, Health & Wellbeing	8 Population, Health & Wellbeing	9 Population, Health & Wellbeing	10 Population, Health & Wellbeing	11 Heritage	12 Land & Water Quality	13 Land & Water Quality	14 Land & Water Quality	15 Natural Landscape	16 Skills, Employment	17 Skills, Employment	18 Skills, Employment	19 Skills, Employment	20 Transport
BAT0079	Land east of Cherry Tree Allotments, Mount Street, Battle	Battle	-	+	-	-	+	o	o	++	+	+	-	+	-	o	-	+	+	o	+	-
BAT0080	Land at Loose Farm, Hastings Road, Battle	Battle	--	o	-	-	o	o	o	++	+	+	+	+	-	o	--	+	+	o	+	-
BAT0081	Marley Farm - Land at, Battle	Battle	--	+	-	-	o	o	o	++	+	+	+	+	-	o	--	+	+	o	+	-
BAT0082	Land north of Battle Wastewater Treatment Works, Battle	Battle	-	+	-	-	o	o	o	++	+	+	+	+	-	o	-	+	+	o	+	-
BAT0114	Land west of North Lodge, the Avenue, North Trade Road, Battle TN33 0HW	Battle	--	-	-	-	o	o	o	++	+	+	--	+	-	o	--	+	+	o	+	-
BAT0117	Land at 1 Loose Farm Cottages - south, Battle	Battle	--	-	-	-	o	o	o	++	+	+	o	+	-	o	--	+	+	o	+	-
BEC0001	Land Adjacent Buddens Green, Main Street, Beckley	Beckley	--	+	-	-	o	o	o	++	+	+	o	+	-	o	-	+	+	o	+	-
BEC0015	Land at Westlands	Beckley	--	o	-	-	o	o	o	++	+	+	o	+	-	o	--	+	+	o	+	-
BEC0023	Swan Meadows, Main Street, Beckley, TN31 6RN	Beckley	--	+	-	-	o	o	o	++	+	+	-	+	-	o	--	+	+	o	+	-
BEC0025	Land west of Royal Oak Close, Beckley	Beckley	--	+	-	-	o	o	o	++	+	+	o	+	-	o	--	+	+	o	+	-
BEC0026	Former Vineyard, Whitebread Lane, Beckley	Beckley	--	o	-	-	o	o	o	++	+	+	o	+	-	o	-	+	+	o	+	-
BEC0033	Land north of Main Street, Beckley	Beckley	--	o	-	-	o	o	o	++	+	+	+	+	-	o	--	+	+	o	+	-
BEC0034	Land and buildings north of Main Street, Beckley	Beckley	--	+	-	-	o	o	o	++	+	+	o	+	-	o	--	+	+	o	+	-
BEC0035	Land west of Hobbs Lane	Beckley	--	-	-	-	o	o	o	++	+	+	o	+	-	o	--	+	+	o	+	-
BEX0103	Land west of Coneyburrow Lane, Bexhill	Bexhill W	--	o	-	-	o	o	o	++	+	+	+	+	-	o	-	+	+	o	+	-
BEX0109	Land at Coast Road, Normans Bay, Bexhill	Bexhill W	--	-	-	-	--	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
BEX0110	Land adjoining Pebsham Rural Business Park, Pebsham Lane, Bexhill,	Bexhill NE	--	o	-	-	o	o	o	++	+	+	o	+	-	o	-	+	+	o	+	-

HELAA Reference	Site Name, Settlement	Parish	1 Air Quality	2 Biodiversity	3 Energy & Water Consumption	4 Energy & Water Consumption	5 Climate Change Adaptation	6 Climate Change Adaptation	7 Population, Health & Wellbeing	8 Population, Health & Wellbeing	9 Population, Health & Wellbeing	10 Population, Health & Wellbeing	11 Heritage	12 Land & Water Quality	13 Land & Water Quality	14 Land & Water Quality	15 Natural Landscape	16 Skills, Employment	17 Skills, Employment	18 Skills, Employment	19 Skills, Employment	20 Transport
BEX0111	Land between 18 - 20 Collington Park Crescent, Bexhill on sea, East Sussex	Bexhill C	-	+	-	-	o	o	o	++	+	+	+	+	-	o	-	+	+	o	+	-
BEX0118	Conquest House, 32-34 Collington Avenue, Bexhill	Bexhill C	--	+	-	-	+	o	o	++	+	+	+	+	-	o	+	--	--	o	+	-
BEX0119	Land at Barnhorne Hill Farm, Barnhorn Road, Bexhill	Bexhill W	--	+	-	-	o	o	o	++	+	+	+	+	-	o	-	+	+	o	+	-
BEX0123	Land at The Cedars, Sandhurst Lane, Bexhill	Bexhill W	--	-	-	-	o	o	o	++	+	+	o	+	-	o	+	+	+	o	+	--
BEX0124	Land at The Piggeries, The Bungalow, Sandhurst Lane, Bexhill	Bexhill W	--	-	-	-	-	o	o	++	+	+	o	+	-	o	o	+	+	o	+	--
BEX0128	Picknill Green Farm Buildings, Sandhurst Lane, Bexhill	Bexhill W	--	-	-	-	-	o	o	++	+	+	o	+	-	o	-	+	+	o	+	-
BEX0173	Land east of Summerleas, Peartree Lane, Bexhill	Bexhill W	--	-	-	-	o	o	o	++	+	+	o	+	-	o	+	+	+	o	+	-
BEX0177	Land south of Whydown Road	Bexhill W	--	-	-	-	o	o	o	++	+	+	o	+	-	o	+	+	+	o	+	-
BEX0186	Land north-west of Bexhill Road, Pebsham	Bexhill NE	--	-	-	-	o	o	o	++	+	+	o	+	-	o	--	+	+	o	+	-
BEX0206	Land at Gotham Farm (west), Sandhurst Lane, Bexhill	Bexhill W	--	-	-	-	-	o	o	++	+	+	+	+	-	o	--	+	+	o	+	-
BEX0207	Kloofs Caravan Park, Sandhurst Lane	Bexhill W	--	o	-	-	-	o	o	++	+	+	o	+	-	o	+	--	--	o	+	-
BEX0209	Land at Chestnut Meadows Site B, Bexhill	Bexhill NE	--	o	-	-	-	o	o	++	+	+	+	+	-	o	--	+	+	o	+	-
BRE0029	Land rear of The Old Manor, Udimore Road, Broad Oak	Brede	--	+	-	-	o	o	o	++	+	+	o	+	-	o	--	+	+	o	+	-
BRE0044	Broad Oak Meadow, Chitcombe Road, Broad Oak	Brede	--	o	-	-	+	o	o	++	+	+	+	+	-	o	--	+	+	o	+	-
BRE0046	Land to the rear of Crown Cottage, Cackle Street, Brede	Brede	--	o	-	-	+	o	o	++	+	+	-	+	-	o	--	+	+	o	+	-
BUR0018	Pooks Hill Farm, Land at junction of A265 and Fooks Lane, Burwash Weald	Burwash	--	o	-	-	o	o	o	++	+	+	o	+	-	o	--	+	+	o	+	-
BUR0019	Ashlands, High Street, Burwash	Burwash	--	o	-	-	o	o	o	++	+	+	o	+	-	o	--	+	+	o	+	-

HELAA Reference	Site Name, Settlement	Parish	1 Air Quality	2 Biodiversity	3 Energy & Water Consumption	4 Energy & Water Consumption	5 Climate Change Adaptation	6 Climate Change Adaptation	7 Population, Health & Wellbeing	8 Population, Health & Wellbeing	9 Population, Health & Wellbeing	10 Population, Health & Wellbeing	11 Heritage	12 Land & Water Quality	13 Land & Water Quality	14 Land & Water Quality	15 Natural Landscape	16 Skills, Employment	17 Skills, Employment	18 Skills, Employment	19 Skills, Employment	20 Transport
BUR0021	Land to the north of Luck Farm, Vicarage Road, Burwash Common	Burwash	-	+	-	-	+	o	o	++	+	+	+	+	-	o	o	+	+	o	+	-
BUR0024	Little Dawes, A265, Burwash	Burwash	--	o	-	-	o	o	o	++	+	+	-	+	-	o	--	+	+	o	+	-
BUR0036	Land at Broadview, Heathfield Road	Burwash	--	+	-	-	o	o	o	++	+	+	+	+	-	o	--	+	+	o	+	-
CAM0011	Dudley's Field, Land to the South of Oliphant's Barn, Jury's Gap, Lydd Road, Camber	Camber	--	-	-	-	-	o	o	++	+	+	+	+	-	o	-	+	+	o	+	-
CAT0012	Land off Church Lane, Catsfield	Catsfield	--	+	-	-	o	o	o	++	+	+	-	+	-	o	--	+	+	o	+	-
CAT0013	Piggery, Great Park Farm, Horns Corner, Catsfield	Catsfield	--	o	-	-	o	o	o	++	+	+	+	+	-	o	-	+	+	o	+	-
CAT0014	The Brooks, Church Road	Catsfield	--	o	-	-	-	o	o	++	+	+	o	+	-	o	-	+	+	o	+	-
CAT0017	Land Lying To The North-West Of Catsfield	Catsfield	--	o	-	-	o	o	o	++	+	+	+	+	-	o	--	+	+	o	+	-
CAT0018	Land west of Catsfield Road	Catsfield	--	o	-	-	o	o	o	++	+	+	+	+	-	o	--	+	+	o	+	-
CAT0019	Land North of Captain's Wood, Land at Normanhurst Estate, Catsfield	Catsfield	--	o	-	-	o	o	o	++	+	+	+	+	-	o	--	+	+	o	+	-
CAT0020	Land rear of Spring Cottage, Church Lane, Catsfield, Battle	Catsfield	--	+	-	-	o	o	o	++	+	+	+	+	-	o	--	+	+	o	+	-
CAT0021	Nursery (glasshouses), Great Park Farm, Horns Corner, Catsfield	Catsfield	--	o	-	-	o	o	o	++	+	+	-	+	-	o	-	+	+	o	+	--
CAT0026	Land to the east of The Warren, North Trade Road, Battle	Catsfield	--	o	-	-	o	o	o	++	+	+	+	+	-	o	--	+	+	o	+	-
CAT0027	Land at Peppering Eye, Battle, TN33 0ST	Catsfield	--	--	-	-	o	o	o	++	+	+	o	+	-	o	--	+	+	o	+	-
CAT0028	Normanhurst Court Caravan & Motorhome Club, Freckley Hollow, TN33 9LR	Catsfield	--	-	-	-	o	o	o	++	+	+	-	+	-	o	--	+	+	o	+	-
DAL0002	Land at Pantons, The Street, Dallington,	Dallington	--	+	-	-	+	o	o	++	+	+	--	+	-	o	--	+	+	o	+	-
ETC0021	Premises at Station Yard, High Street, Etchingam	Etchingam	--	o	-	-	--	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-

HELAA Reference	Site Name, Settlement	Parish	1 Air Quality	2 Biodiversity	3 Energy & Water Consumption	4 Energy & Water Consumption	5 Climate Change Adaptation	6 Climate Change Adaptation	7 Population, Health & Wellbeing	8 Population, Health & Wellbeing	9 Population, Health & Wellbeing	10 Population, Health & Wellbeing	11 Heritage	12 Land & Water Quality	13 Land & Water Quality	14 Land & Water Quality	15 Natural Landscape	16 Skills, Employment	17 Skills, Employment	18 Skills, Employment	19 Skills, Employment	20 Transport
EWH0001	Goodwin Farm, Adams Lane, Ewhurst	Ewhurst	-	o	-	-	o	o	o	++	+	+	+	+	-	o	-	+	+	o	+	-
EWH0009	Land east of Hop Gardens, Northiam Road, Staplecross	Ewhurst	-	+	-	-	+	o	o	++	+	+	+	+	-	o	-	+	+	o	+	-
EWH0012	Wattle Hill, Beacon Lane, Staplecross	Ewhurst	-	+	-	-	o	o	o	++	+	+	o	+	-	o	-	+	+	o	+	-
EWH0017	St Marks Church, Staplecross	Ewhurst	-	+	-	-	o	o	-	++	+	+	-	+	-	o	o	+	+	o	+	-
FAI0015	Land north of Battery Hill, Fairlight	Fairlight	-	-	-	-	o	o	o	++	+	+	o	+	-	o	-	+	+	o	+	-
FAI0016	Guestling Telephone Exchange, Pett Road, Friars Hill, Guestling, TN35 4EX	Fairlight	-	-	-	-	o	o	o	++	+	+	o	+	-	o	-	+	+	o	+	-
HAF0007	Land at Breadsell Farm, Hastings Road	Battle	-	-	-	-	o	o	o	++	+	+	+	+	-	o	-	+	+	o	+	-
HAF0013	Land rear of 70 Westfield Lane	Westfield	-	-	-	-	o	o	o	++	+	+	+	+	-	o	-	+	+	o	+	-
HAF0014	Land adjacent to Millward Gardens, Batchelors Bump	Guestling	-	+	-	-	o	o	o	++	+	+	+	+	-	o	-	+	+	o	+	-
HAF0017	Land at Beechwood, Chowns Hill	Guestling	-	-	-	-	+	o	o	++	+	+	+	+	-	o	-	+	+	o	+	-
HAF0027	Land at Breadsell Farm Bungalow, Breadsell Lane TN38 8EB	Battle	-	+	-	-	o	o	o	++	+	+	+	+	-	o	-	+	+	o	+	-
HAF0032	Land at 56 Westfield Lane, Westfield	Westfield	-	-	-	-	o	o	o	++	+	+	+	+	-	o	-	+	+	o	+	-
HUG0017	Sweethayes Farm, London Road, Hurst Green	Hurst Green	-	+	-	-	+	o	o	++	+	+	+	+	-	o	-	+	+	o	+	-
HUG0018	Land adjacent to Iridge Place, London Road, Hurst Green	Hurst Green	-	-	-	-	o	o	o	++	+	+	+	+	-	o	-	+	+	o	+	-
HUG0019	South of Burgh Hill, Hurst Green	Hurst Green	-	+	-	-	o	o	o	++	+	+	+	+	-	o	-	+	+	o	+	-
HUG0020	Land adjacent to Mill Barn, Silver Hill, Hurst Green	Hurst Green	-	+	-	-	o	o	o	++	+	+	-	+	-	o	-	+	+	o	+	-
HUG0022	Land rear of Foundry Close (northern parcel), Hurst Green	Hurst Green	-	o	-	-	o	o	o	++	+	+	+	+	-	o	-	+	+	o	+	-

HELAA Reference	Site Name, Settlement	Parish	1 Air Quality	2 Biodiversity	3 Energy & Water Consumption	4 Energy & Water Consumption	5 Climate Change Adaptation	6 Climate Change Adaptation	7 Population, Health & Wellbeing	8 Population, Health & Wellbeing	9 Population, Health & Wellbeing	10 Population, Health & Wellbeing	11 Heritage	12 Land & Water Quality	13 Land & Water Quality	14 Land & Water Quality	15 Natural Landscape	16 Skills, Employment	17 Skills, Employment	18 Skills, Employment	19 Skills, Employment	20 Transport
HUG0023	Land rear of Foundry Close (southern parcel), Hurst Green	Hurst Green	-	+	-	-	o	o	o	++	+	+	+	+	-	o	-	+	+	o	+	-
ICK0001	Six Acres, Sea Road, Winchelsea Beach	Icklesham	--	--	-	-	--	o	o	++	+	+	+	+	-	o	--	+	+	o	+	-
ICK0002	Seven Acres, Watermill Lane, Icklesham, East Sussex	Icklesham	--	-	-	-	o	o	o	++	+	+	+	+	-	o	--	+	+	o	+	-
ICK0025	Windmill Caravan Park, Willow Lane, Winchelsea Beach, Winchelsea	Icklesham	--	o	-	-	-	o	o	++	+	+	+	+	-	o	o	-	-	o	+	-
ICK0027	Land between Morlais Ridge and The Ridge, Winchelsea Beach	Icklesham	--	+	-	-	-	o	o	++	+	+	+	+	-	o	--	+	+	o	+	-
ICK0028	Weslake Industrial Estate, Rye Harbour Road, Rye Harbour	Icklesham	--	-	-	-	-	o	o	++	+	+	+	+	-	o	+	--	--	o	+	-
ICK0047	Land to the rear of Orchard Close, Icklesham	Icklesham	--	+	-	-	o	o	o	++	+	+	o	+	-	o	--	+	+	o	+	-
IDE0009	Land on the north of Church Lane, Iden	Iden	--	o	-	-	o	o	o	++	+	+	o	+	-	o	-	+	+	o	+	-
IDE0020	Land at Wycombe, Grove Lane, Iden	Iden	--	o	-	-	o	o	o	++	+	+	o	+	-	o	--	+	+	o	+	-
MOU0005	Land west of Hoath Hill, Mountfield	Mountfield	--	+	-	-	-	o	o	++	+	+	-	+	-	o	--	+	+	o	+	-
NOR0001	Land east of B2088, Northiam	Northiam	--	o	-	-	o	o	o	++	+	+	-	+	-	o	--	+	+	o	+	-
NOR0002	Ivy Lodge, Station Road, Northiam	Northiam	--	o	-	-	o	o	o	++	+	+	o	+	-	o	--	+	+	o	+	-
NOR0023	Ballards, Station Road, Northiam, East Sussex	Northiam	--	o	-	-	o	o	o	++	+	+	-	+	-	o	--	+	+	o	+	-
NOR0024	Land off Main Street, Part Of Hayes Farm, Northiam	Northiam	--	o	-	-	o	o	o	++	+	+	--	+	-	o	--	+	+	o	+	-
NOR0025a	Land at The Cedars (large site), Station Road, Northiam	Northiam	--	+	-	-	o	o	o	++	+	+	-	+	-	o	-	+	+	o	+	-
NOR0025b	Land at The Cedars (medium site), Station Road, Northiam	Northiam	--	+	-	-	o	o	o	++	+	+	-	+	-	o	--	+	+	o	+	-
NOR0025c	Land at The Cedars (small site), Station Road, Northiam	Northiam	--	+	-	-	o	o	o	++	+	+	-	+	-	o	--	+	+	o	+	-

HELAA Reference	Site Name, Settlement	Parish	1 Air Quality	2 Biodiversity	3 Energy & Water Consumption	4 Energy & Water Consumption	5 Climate Change Adaptation	6 Climate Change Adaptation	7 Population, Health & Wellbeing	8 Population, Health & Wellbeing	9 Population, Health & Wellbeing	10 Population, Health & Wellbeing	11 Heritage	12 Land & Water Quality	13 Land & Water Quality	14 Land & Water Quality	15 Natural Landscape	16 Skills, Employment	17 Skills, Employment	18 Skills, Employment	19 Skills, Employment	20 Transport
NOR0026	Egmont Farm, Station Road, Northiam	Northiam	-	o	-	-	o	o	o	++	+	+	+	+	-	o	-	+	+	o	+	-
PEA0007	Kings Head, Main Street, Peasmarsh	Peasmarsh	-	o	-	-	o	o	o	++	+	+	-	+	-	o	-	+	+	o	+	-
PEA0024	Tanyard, Main Street, Peasmarsh	Peasmarsh	-	o	-	-	o	o	o	++	+	+	-	+	-	o	-	+	+	o	+	-
PEA0025	Land at Tanhouse Lane, Peasmarsh	Peasmarsh	-	+	-	-	+	o	o	++	+	+	o	+	-	o	-	+	+	o	+	-
PEA0034	Land adjacent to Cornerways, School Lane, Peasmarsh	Peasmarsh	-	o	-	-	+	o	o	++	+	+	+	+	-	o	-	+	+	o	+	-
PEA0038	Tanhouse Site B - west, Tanhouse Lane, Peasmarsh	Peasmarsh	-	+	-	-	o	o	o	++	+	+	-	+	-	o	-	+	+	o	+	-
PEA0039	Pond Cottage, Tanhouse Lane, Main Street	Peasmarsh	-	-	-	-	o	o	o	++	+	+	-	+	-	o	-	+	+	o	+	-
PET0011	Land at Gatehurst Farm, Pett Road, Pett, Hastings	Pett	-	o	-	-	o	o	o	++	+	+	o	+	-	o	-	+	+	o	+	-
PET0012	Land adjacent to Little Fraysland, Pett Road, Pett, East Sussex, TN35 4HE	Pett	-	o	-	-	o	o	o	++	+	+	o	+	-	o	-	+	+	o	+	-
PET0013	Land adjacent to Little Buds, Pett Road, Pett	Pett	-	o	-	-	o	o	o	++	+	+	-	+	-	o	-	+	+	o	+	-
PET0014	Land west of Lunsford Farm, Pett Road, Pett	Pett	-	o	-	-	o	o	o	++	+	+	+	+	-	o	-	+	+	o	+	-
PET0015	Lower Chick Hill Field, Chick Hill, Pett	Pett	-	o	-	-	-	o	o	++	+	+	o	+	-	o	-	+	+	o	+	-
PET0017	Land rear of High Elms Farm, Pett Road, Pett	Pett	-	o	-	-	o	o	o	++	+	+	o	+	-	o	-	+	+	o	+	-
PET0020	Fairlight Wood Camp Site, Watermill Lane, Pett TN35 4HY	Pett	-	o	-	-	o	o	o	++	+	+	+	+	-	o	-	+	+	o	+	-
PLA0002	Land on the south of Playden Lane, Playden	Playden	-	+	-	-	o	o	o	++	+	+	-	+	-	o	-	+	+	o	+	-
PLA0003	Land at Playden Forge, Rye Road, Playden, Rye	Playden	-	+	-	-	o	o	o	++	+	+	-	+	-	o	-	+	+	o	+	-
RYE0025	Land at Rye Marina	Rye	-	-	-	-	-	o	o	++	+	+	o	+	-	o	o	+	+	o	+	-
RYE0037	Land at Ferry Road & Cypress Place, Rye	Rye	-	+	-	-	-	o	o	++	+	+	o	+	-	o	-	+	+	o	+	-

HELAA Reference	Site Name, Settlement	Parish	1 Air Quality	2 Biodiversity	3 Energy & Water Consumption	4 Energy & Water Consumption	5 Climate Change Adaptation	6 Climate Change Adaptation	7 Population, Health & Wellbeing	8 Population, Health & Wellbeing	9 Population, Health & Wellbeing	10 Population, Health & Wellbeing	11 Heritage	12 Land & Water Quality	13 Land & Water Quality	14 Land & Water Quality	15 Natural Landscape	16 Skills, Employment	17 Skills, Employment	18 Skills, Employment	19 Skills, Employment	20 Transport
RYE0039	Land at Gateborough Farm, Winchelsea Road, Rye	Rye	-	+	-	-	-	o	o	++	+	+	-	+	-	o	-	+	+	o	+	-
RYE0042	Land at Cadborough Farm, Udimore Road	Rye	-	o	-	-	+	o	o	++	+	+	-	+	-	o	-	+	+	o	+	-
RYE0043	Land to North West of Udimore Road, Rye	Rye	-	o	-	-	+	o	o	++	+	+	+	+	-	o	-	+	+	o	+	-
RYE0047	Rye Paddock, Harbour Road, Rye	Rye	-	-	-	-	-	o	o	++	+	+	+	+	-	o	-	+	+	o	+	-
SAL0021	Land associated with Hackwoods Bungalow, Willards Hill, Robertsbridge	Salehurst & Robertsbridge	-	o	-	-	o	o	o	++	+	+	+	+	-	o	-	+	+	o	+	-
SAL0024	Openfield, north of Northbridge Street, Robertsbridge	Salehurst & Robertsbridge	-	o	-	-	+	o	o	++	+	+	o	+	-	o	-	+	+	o	+	-
SAL0025	Beech Farm (small site), Knelle Road, Robertsbridge	Salehurst & Robertsbridge	-	+	-	-	+	o	o	++	+	+	+	+	-	o	-	+	+	o	+	-
SAL0034	Beech Farm (large site), Knelle Road, Robertsbridge	Salehurst & Robertsbridge	-	o	-	-	o	o	o	++	+	+	+	+	-	o	-	+	+	o	+	-
SED0035	Land at Compasses Lane, Cripps Corner	Sedlescombe	-	o	-	-	+	o	o	++	+	+	o	+	-	o	-	+	+	o	+	-
TIC0002	Land between Rosemary Lane and Broom Hill, Berners Hill, Flimwell, Ticehurst	Ticehurst	-	o	-	-	+	o	o	++	+	+	o	+	-	o	-	+	+	o	+	-
TIC0023	Land off Lower Platts, Ticehurst	Ticehurst	-	o	-	-	o	o	o	++	+	+	+	+	-	o	-	+	+	o	+	-
TIC0038	Land adjacent Seacox Cocks, Hawkhurst Road, Flimwell, Wadhurst, East Sussex	Ticehurst	-	o	-	-	+	o	o	++	+	+	o	+	-	o	-	+	+	o	+	-
TIC0039	Land North of Broom Hill, Ticehurst	Ticehurst	-	o	-	-	o	o	o	++	+	+	+	+	-	o	-	+	+	o	+	-
TIC0040	40 and 41 High Street, and land to the rear, Ticehurst, East Sussex	Ticehurst	-	+	-	-	o	o	o	++	+	+	-	+	-	o	-	+	+	o	+	-
TIC0041	Berners Hill Farm, Flimwell, Nr Wadhurst, Sussex	Ticehurst	-	o	-	-	+	o	o	++	+	+	o	+	-	o	-	+	+	o	+	-
TIC0042	Land at Ridgeway Farm, Burnt Lodge Lane, Ticehurst	Ticehurst	-	o	-	-	o	o	o	++	+	+	+	+	-	o	-	+	+	o	+	-

HELAA Reference	Site Name, Settlement	Parish	1 Air Quality	2 Biodiversity	3 Energy & Water Consumption	4 Energy & Water Consumption	5 Climate Change Adaptation	6 Climate Change Adaptation	7 Population, Health & Wellbeing	8 Population, Health & Wellbeing	9 Population, Health & Wellbeing	10 Population, Health & Wellbeing	11 Heritage	12 Land & Water Quality	13 Land & Water Quality	14 Land & Water Quality	15 Natural Landscape	16 Skills, Employment	17 Skills, Employment	18 Skills, Employment	19 Skills, Employment	20 Transport
TIC0046	Villa Flair, Union Street, Flimwell, Ticehurst	Ticehurst	-	-	-	-	+	o	o	++	+	+	+	+	-	o	-	+	+	o	+	-
TIC0048	Land at Tinkers Lane, Ticehurst	Ticehurst	-	o	-	-	+	o	o	++	+	+	+	+	-	o	-	+	+	o	+	-
TIC0049	Land north of Steellands Rise & Banky Field, Ticehurst	Ticehurst	-	o	-	-	o	o	o	++	+	+	-	+	-	o	-	+	+	o	+	-
TIC0079	Land at Lynden Lane, Stonegate	Ticehurst	-	o	-	-	o	o	o	++	+	+	+	+	-	o	-	+	+	o	+	-
TIC0086	Church Farm, The Mount, Flimwell	Ticehurst	-	+	-	-	+	o	o	++	+	+	-	+	-	o	-	+	+	o	+	-
UDI0002	Land north of Vines Farm, Udimore Road	Udimore	-	+	-	-	+	o	o	++	+	+	o	+	-	o	-	+	+	o	+	-
UDI0004	Land at Udimore Road, Rye	Udimore	-	o	-	-	-	o	o	++	+	+	+	+	-	o	-	+	+	o	+	-
UDI0005	Land to the south of Udimore Road	Udimore	-	+	-	-	o	o	o	++	+	+	o	+	-	o	-	+	+	o	+	-
WES0001	Land west of Cottage Lane, Westfield, TN35 4QX	Westfield	-	-	-	-	o	o	o	++	+	+	o	+	-	o	-	+	+	o	+	-
WES0022	Field at Thornyridge, Westbrook Lane, Westfield	Westfield	-	o	-	-	+	o	o	++	+	+	+	+	-	o	-	+	+	o	+	-
WES0023	Land at Tanyard Farmhouse, Fishponds Lane, Westfield	Westfield	-	o	-	-	o	o	o	++	+	+	-	+	-	o	-	+	+	o	+	-
WES0024	Land north of Fishponds Lane and east of Workhouse Lane, Westfield	Westfield	-	o	-	-	o	o	o	++	+	+	o	+	-	o	-	+	+	o	+	-
WES0043	Troyd Farm, Moat Lane, Westfield	Westfield	-	o	-	-	o	o	o	++	+	+	+	+	-	o	-	+	+	o	+	-
WES0044	Land at Thala Farm, Mill Lane, Westfield, Hastings TN35 4SU	Westfield	-	o	-	-	o	o	o	++	+	+	o	+	-	o	-	+	+	o	+	-

Summary for all Sites

5.2.16 All sites that have been identified above are sites that are considered available but not suitable and therefore not developable within the Council's Draft HELAA. The overall sustainability and suitability of development is severely impacted by the environmental and physical constraints. All sites will have varying degrees of constraints and sustainability impacts and these are discussed in more detail below. The sustainability analysis provides a comparative assessment of the sustainability merits of each site but does not ultimately determine the decision about whether sites form part of the development strategy. Whilst it can be seen that the sites do contain more negative scores in relation to some objectives, the delivery of housing altogether is still positive or neutral against a number of the SA objectives.

Sustainability Impacts

- 5.2.17 In line with the previous two assessments, all new residential development will inevitably have a negative impact on reducing air pollution, and reducing greenhouse gases, it will also not be able to minimise water consumption as it will add to additional water demands. This is also the case for minimising waste and recycling which cannot be guaranteed through construction or operation. Road congestion will not be able to be alleviated, but the development strategy in general, rather than individual development sites will be able to assist in providing opportunities for a modal shift in travel choice and less dependency on the car for general travel.
- 5.2.18 Biodiversity improvements can be provided through associated BNG so are generally neutral impacts, unless there is a strong reason why the site is unsuitable such as the strong biodiversity and or designated habits and ecology on or adjoining the sites, such as priority habitats, habitats sites, ancient woodland or other designations. For these reasons a site would have a negative core against the biodiversity objective. The impacts which are generally neutral include: waste and recycling, risk of pollution, ensuring parks and gardens are protected, overall health and wellbeing, poverty and social exclusion and the risk to coastal erosion.
- 5.2.19 The objectives that generally differ for each site will be the impacts on flood risk and climate change as well as the impact on the historic environment and landscape of the countryside. These will be picked up specifically in the sustainability assessment above. Where sites have a negatively impact on Objective 5 – it is likely that flooding is a severe constraint and precludes development, Where sites score negatively in Objective 2 – it is likely that biodiversity impacts are significant and cannot be mitigated. Where sites have a negative impact on Objective 11 – development is considered unacceptable for its impact on the setting of listed buildings or other built heritage. Where sites have a negatively impact on Objective 15 – the site will be located within the High Weald national landscape and will negatively impact the setting and important features of the national landscape.
- 5.2.20 There will also be specific reasons why sites are not suitable for development, which are not clearly identified through the SA. These include access issues to a site and ransom strips which affect development potential, but are not clearly related to the SA objectives.

Conclusions

- 5.2.21 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.

5.3 Sub-Area Visions and Distribution of Development

- 5.3.1 The following table (Figure 16) provides 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.

Figure 16 : Sub-Area Visions and Distribution of development

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

SA Objective / Sub-Area Visions & Development	Bexhill	Hastings Fringes	Battle	Rye & Eastern Settlements	Northern Rother	Commentary
						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 and inequalities in health are reduced.	++	++	++	++	++	The vision for sub-areas 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.	++	++	++	++	++	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 protected, enhanced and made more accessible.	++	+	+	+	+	Open space of high importance can be protected, with greatest opportunity for protection in Bexhill area, in areas outside High Weald national landscape. Sensitive development will only occur in

SA Objective / Sub-Area Visions & Development	Bexhill	Hastings Fringes	Battle	Rye & Eastern Settlements	Northern Rother	Commentary
						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	

Summary of SA of Sub-Area Visions and Development

5.3.2 The Sub-areas visions are not specific policies within the Local Plan but help to set a picture for how the sub-areas will develop over time up to the end of the plan period in 2040. The SA process helps to identify that there a very similar sustainability merits in each of the sub-areas with Bexhill scoring highest, mainly because it and its immediately surrounding area is located outside the High Weald national landscape. The sub-area interrelate, but provide a useful tool in understanding the relations hip between settlements within the District and how sustainable transport choices are available to allow journeys to the main core areas and enabling residents to live well locally. There is no further need to assess the cumulative or synergistic effects as these have been assessed under the wider development strategy.

Sites for Gypsies, Travellers and Travelling Showpeople

5.3.3 The Local Plan has assessed its housing need within the [Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment \(GTAA\) \(2022\)](#) which was commissioned jointly across East Sussex. This has identified a specific need for Rother of 23 permanent pitches which is to be delivered at different timeframes up to 2040 to meet local need. Sites will be allocated at the next stage of the Local Plan in order to meet need. At this moment in time the draft strategy states that Site selection will take into account the Local Plan objectives, the future needs of occupiers and the likely availability of sites for the intended occupiers. Sites should meet the criteria set in Policy HOU11 of the Local Plan. The following tables (Figure 17 and 18) provide an assessment of the proposed strategy against the sustainability objectives.

Figure 17 : SA Summary for the Proposed Strategy for Gypsies, Travellers and Travelling Showpeople

SA Objective / Proposed Strategy	Proposed Strategy for Gypsies, Travellers & Showpeople	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.

SA Objective / Proposed Strategy	Proposed Strategy for Gypsies, Travellers & Showpeople	Commentary
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 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 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 levels will inevitably not reduce. Transport interventions will be required to cater for overall growth.
SCORING	10	

Figure 18 : Summary of SA Impacts for the Development Strategy for Gypsies, Travellers and Travelling Showpeople

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 meet 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 ensure sustainable communities and ensure 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.

Health Impact Assessment of Development Strategy (including Gypsies, Travellers and Travelling Showpeople)

5.3.4 The following table (Figure 19) provides a Health Impact Assessment of the proposed development strategy for the Local Plan along with the proposed strategy for gypsies, travellers and travelling show people. This demonstrates the health and wellbeing factors and benefits associated with the development strategy and how this can impact the proposed policy.

Figure 19 : Health Impact Assessment Framework for the Development Strategy (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? (eg. 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 amount of pitches over the lifetime of the Local Plan will ensure that the needs of this section of community can be 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? (eg. 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? (eg. 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? (eg. 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 and vulnerable section of society. Together with other policies in the plan, the gap can be narrowed 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.
How will negative impacts be mitigated?	Future development allocations will ensure infrastructure needed to support development will be delivered along with adequate open space to support health and wellbeing.	Future development allocations 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 policy changes required. Consideration of the factors above will be made when determining site allocations.	No policy changes required. Consideration of the factors above will be made when determining site allocations.

5.4 Green to the Core

5.4.1 The following section of the appraisal relates to the Green to the Core chapter of the Local Plan, and the development of the following policies:

- Proposed Policy GTC1: Net Zero Building Standards
- Proposed Policy GTC2: Net Zero Retrofit Standards
- Proposed Policy GTC3: Construction Materials and Waste
- Proposed Policy GTC4: Water Efficiency
- Proposed Policy GTC5: Heat Networks
- Proposed Policy GTC6: Renewable and Low Carbon Energy
- Proposed Policy GTC7: Local Nature Recovery Areas
- Proposed Policy GTC8: Biodiversity Net Gain
- Proposed Policy GTC9: High Weald National Landscape (AONB)

5.4.2 The policies in this chapter of the plan have been developed to address the important ‘green’ environmental issues for the plan starting with responding to the climate emergency and the development of green spaces and biodiversity. The chapter concludes with a policy area in relation to the High Weald National landscape which forms a critically important landscape setting and environmental designation for the district.

5.4.3 The policy areas considered are as follows:

Policy Area 1: Net Zero Building Standards

Policy Option 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.

Policy Option 2: Net Zero Retrofit Standards

Policy Option 2a: A standalone policy with recommendations for all retrofit schemes to meet certain standards.

Policy Area 3: Construction Materials and Waste

Policy Option 3A: Standalone policy with several criteria recommending ways to reduce construction site waste.

Policy Area 4: Water Efficiency

This Policy area is assessed under the Environmental Management Chapter and has then been moved into the Green to the Core Chapter of the Local Plan.

Policy Area 5: Heat Networks

Policy Option 5a: A standalone policy in support of heat networks.

Policy Area 6: Renewable and Low Carbon Energy

Policy Option 6a: A standalone policy to support renewable and low carbon energy generation

Policy Area 7: Local Nature Recovery Areas

Policy Option 7a: A new standalone policy to support the objectives of the Local Nature Recovery Areas

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)

Policy Option 8b: A new standalone policy to support the objectives of the Local Nature Recovery Areas at 20%

Policy Area 9: High Weald National Landscape

Policy Option 9a: A standalone policy to support the consideration of development in the High Weald National Landscape

5.4.4 The following tables (Figures 20-22) provide a summary of the sustainability appraisal of the policy options as well as a HIA of the proposed policies. This demonstrates the strong sustainability benefits in moving forward with the proposed policies and the merits of proposed policies on health and wellbeing.

Figure 20 : Policy Options Comparison for Green to the Core Chapter

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

Figure 21: Summary of SA Impacts for the Green to the Core 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)
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	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

					policies which amplify the effect	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 in the High Weald National Landscape	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.

Figure 22 : Health Impact Assessment Framework for the Green to the Core Chapter

HIA Screening	GTC1 – Net Zero building standards	GTC2 – Net Zero Retrofit standards	GTC3 – Construction materials and waste	GTC4 – Water efficiency	GTC5 – Heat networks	GTC6 – Renewable and low carbon energy	GTC7 – Local Nature Recovery Areas	GTC8 – Biodiversity Net Gain	GTC9 – High Weald National Landscape
Will the policy have a direct impact on health, mental health and wellbeing?	No	No	No	No	No	No	No	Yes	Yes
Will the policy have an impact on social, economic and environmental living conditions that would indirectly affect health?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Will the policy affect an individual's ability to improve their own health and wellbeing?	No	No	No	No	No	Yes	Yes	Yes	Yes
Will there be a change in demand for or access to health and social care services?	No	No	No	No	No	No	No	No	No
Full HIA Criteria	GTC1 – Net Zero building standards	GTC2 – Net Zero Retrofit standards	GTC3 – Construction materials and waste	GTC4 – Water efficiency	GTC5 – Heat networks	GTC6 – Renewable and low carbon energy	GTC7 – Local Nature Recovery Areas	GTC8 – Biodiversity Net Gain	GTC9 – High Weald National Landscape

What are the direct impacts on health, mental health and wellbeing? (eg. ill health, social exclusion, isolation, non-participation, safety)	No direct impacts, it is more about the impacts of the development on people	No direct impacts, it is more about the impacts of the development on people	No direct impacts, it is more about the impacts of the development on people	No direct impacts, it is more about the impacts of the development on people	No direct impacts, it is more about the impacts of the development on people	No direct impacts, it is more about the impacts of the development on people	Green infrastructure, promotes active lifestyles	Better quality of living, more green space, biodiversity sites	Protect historic landscape, better quality of life, open space
What are the indirect impacts on health, mental health and wellbeing? (eg. housing, transport, child development, education, employment opportunities, green space/nature, accessibility, air/noise/light quality and climate change adaptation)	Better standard housing, climate change adaptation and quality of development	Better standard housing, climate change adaptation and quality of development	Better standard housing, climate change adaptation and quality of development	Water efficiency savings, better quality of life.	Better quality of life and climate change mitigation	Better quality of life and climate change mitigation	Better education, access to green and nature space, opportunities for climate change mitigation	Better education, access to green and nature space, opportunities for climate change mitigation	Better education, child development, access to green space, nature and opportunities for climate change mitigation
What are the opportunities for self-improvement? (eg. ability to be physically active, choose healthy food, access to services/employment/education)	No clear opportunities	No clear opportunities	No clear opportunities	Ability to save costs and be more efficient	No clear opportunities	Opportunities to see benefits, and make better lifestyle choices	Ability to understand nature, potential better access to open space for recreational benefits	Ability to understand nature, potential better access to open space for recreational benefits	Ability to understand nature, potential better access to open space and countryside for recreational benefits
What change in demand for services will there be? (eg. Primary Care, hospital care, community services, mental health, social services)	No direct change in demand for services	No direct change in demand for services	No direct change in demand for services	Demand will be placed on water companies to support the delivery	No direct change in demand for services	Demand will be placed on utility companies to support the delivery	No direct change in demand for services	No direct change in demand for services	No direct change in demand for services
What impacts will there be on planetary health? (e.g. climate change mitigation)	Significant change in responding to climate change	Significant change in responding to climate change	Significant change in responding to climate change	Supports better water usage and overall impacts on green to the core ambitions of the Local Plan	Significant change in responding to climate change, sustainable form of energy production	Significant change in responding to climate change, sustainable form of energy production	Importance of Green space and priority for biodiversity and climate change mitigation	Importance of Green space and priority for biodiversity and climate change mitigation	Importance of valued landscape and links to 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)	Will impact all in society	Will impact all in society	Will impact all in society	Will impact all in society	Will impact all in society	Will impact all in society	Will impact all in society	Will impact all in society	Will impact all in society
How will negative impacts be mitigated?	Increases to cost of development, but necessary	Increases to cost of development, but necessary	Increases to cost of development, but necessary	None identified	Relies on economies of scale, therefore policy only requires implementation on larger schemes	Noise disturbance can be limited through environmental health	Potential loss of farmland, selection of land at least value	Potential loss of farmland, selection of land at least value	None identified
How will positive impacts be enhanced?	Greater impacts will be achieved jointly with other	Greater impacts will be achieved jointly with other	Greater impacts will be achieved jointly with other green to the core policies	Limitations on water use, cost savings work in favour	Greater impacts will be achieved jointly with other green to the core policies	Greater impacts will be achieved jointly with other green to the core policies	Greater impacts will be achieved jointly with other green to the core policies	Greater impacts will be achieved jointly with other green to the core policies	Better quality environment in countryside locations, linked to

	green to the core policies	green to the core policies							other green to core policies which amplify the effect
Recommendations for policy changes.	No required changes to policy	No required changes to policy	No required changes to policy	No required changes to policy	No required changes to policy	No required changes to policy	No required changes to policy	No required changes to policy	No required changes to policy

5.5 Live Well Locally

5.5.1 The following section of the appraisal relates to the Green to the Core chapter of the Local Plan, and the development of the following policies:

- Proposed Policy LWL1: Compact Development
- Proposed Policy LWL2: Facilities & Services
- Proposed Policy LWL3: Walking, Wheeling, Cycling and Public Transport (Outside the Site)
- Proposed Policy LWL4: Walking, Wheeling, Cycling & Public Transport (Within the Site)
- Proposed Policy LWL5: Distinctive Places
- Proposed Policy LWL6: Built Form
- Proposed Policy LWL7: Streets for All
- Proposed Policy LWL8: Multimodal Parking

5.5.2 The ‘Live Well Locally’ concept as an overall priority of the Local Plan underscores Rother’s dedication to cultivating healthy, sustainable, and inclusive communities that support residents across the age spectrum. Live Well Locally aims to create an environment where individuals of all ages can live, work, and play with dignity and independence. Rother seeks to foster a dynamic and vibrant community that values diversity and intergenerational connections. The policies in this chapter are new policies which do not have policy alternatives, as such they have been assessed on their individual merits based on the entirety of the proposed policy wording under each policy area. As such the policy areas are assessed with and without having the policy (therefore relying on national policies within the NPPF). Therefore, the policy options under this section are as follows:

Policy Area 1: Compact Development

Policy Option 1a: New standalone policy in relation to compact development (design and density)

Policy Option 1b: No new policy, and reliance on NPPF policies

Policy Area 2: Facilities and Services

Policy Option 2a: New standalone policy in relation to facilities and services

Policy Option 2b: No new policy, and reliance on NPPF policies

Policy Area 3: Walking Wheeling, Cycling and Public Transport

Policy Option 3a: Requirements to be delivered outside of the site

Policy Option 3b: Requirements to be delivered inside of the site

Policy Area 4: Distinctive Places

Policy Option 4a: New standalone policy in relation to distinctive places

Policy Option 4b: No new policy, and reliance on NPPF policies

Policy Area 5: Built Form

Policy Option 5a: New standalone policy in relation to built form

Policy Option 5b: No new policy, and reliance on NPPF policies

Policy Area 6: Streets for All

Policy Option 6a: New standalone policy in relation to streets for all

Policy Option 6b: No new policy, and reliance on NPPF policies

Policy Area 7: Multimodal Parking

Policy Option 7a: New standalone policy in relation to multimodal parking

Policy Option 7b: No new policy, and reliance on NPPF policies

5.5.3 The following tables (Figures 23-25) provide a summary of the sustainability appraisal of the policy options as well as a HIA of the proposed policies. This demonstrates the strong sustainability benefits in moving forward with the proposed policies and the merits of proposed policies on health and wellbeing.

Figure 23 : Policy Options Comparison for Live Well Locally Chapter

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

SA Objective / Draft Policies	1a	1b	2a	2b	3a	3b	4a	4b	5a	5b	6a	6b	7a	7b
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
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

Figure 24 : Summary of SA Impacts for the Live Well Locally 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)
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	+	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.

	other environmental indicators					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 is 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 reply 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 reply on national policies should not be carried forward.

Figure 25 : Health Impact Assessment Framework for the Live Well Locally Chapter

HIA Screening	LWL1 – Compact development	LWL2 – Facilities and Services	LWL3 – Walking, Wheeling, Cycling and Public Transport (Outside the Site)	LWL4 - Walking, Wheeling, Cycling and Public Transport (Within the Site)	LWL5 – Distinctive Places	LWL6 – Built Form	LWL7 – Streets for All	LWL8 – Multimodal Parking
Will the policy have a direct impact on health, mental health and wellbeing?	Yes	Yes	Yes	Yes	No	No	Yes	No

Will the policy have an impact on social, economic and environmental living conditions that would indirectly affect health?	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes
Will the policy affect an individual's ability to improve their own health and wellbeing?	Yes	Yes	Yes	Yes	No	No	Yes	Yes
Will there be a change in demand for or access to health and social care services?	No	No	No	No	No	No	No	No
Full HIA Criteria	LWL1 – Compact development	LWL2 – Facilities and Services	LWL3 – Walking, Wheeling, Cycling and Public Transport (Outside the Site)	LWL4 - Walking, Wheeling, Cycling and Public Transport (Within the Site)	LWL5 – Distinctive Places	LWL6 – Built Form	LWL7 – Streets for All	LWL8 – Multimodal Parking
What are the direct impacts on health, mental health and wellbeing? (eg. ill health, social exclusion, isolation, non-participation, safety)	Higher densities means compact development, inclusive and safe communities	Strong positive in access to services and facilities by sustainable modes of transport	Better participation and safety for cycling and pedestrians. Opportunities to improve healthy lifestyles	Better facilities on site for cyclists and using sustainable modes of transport, good for mental health and inclusion	No direct impacts	N/A	Supporting green infrastructure, walking opportunities promotes active lifestyles, avoids ill health	No direct impacts
What are the indirect impacts on health, mental health and wellbeing? (eg. housing, transport, child development, education, employment opportunities, green space/nature, accessibility, air/noise/light quality and climate change adaptation)	Housing near to service centres, better access to education, employment, shared spaces	Indirect positive impacts to mental health in ability to access services, education and employment opportunities	Better access to services and facilities, green space etc. Positive for climate change mitigation and liver well locally concepts in the Local Plan	Better opportunities for sustainable modes of transport to be accommodated on site, live healthy lifestyles, positive for mental health	Better design developments, better quality of life and ability for people to lead their lives better and be accessible to all	N/A	Better and safer access to services and facilities, green space etc. Shared spaces, feeling of community cohesion.	Better quality of living, more green space, biodiversity in sites
What are the opportunities for self-improvement? (eg. ability to be physically active, choose healthy food, access to services/employment/education)	Better access to services and facilities, stronger communities for participation	Ability to be physically active, walk to services, work and education etc	Ability to be physically active, walk to services, work and education etc	Ability to be physically active, walk to services, work and education etc	Ability to participate in society and to access services and facilities	N/A	Encourages safe pedestrian activity, ability to be physically active	Encourages shift in personal choice of mode to sustainable transport
What change in demand for services will there be? (e.g. Primary Care, hospital care, community services, mental health, social services)	No direct change in demand for services	No direct change in demand for services	No direct change in demand for services	No direct change in demand for services	No direct change in demand for services	N/A	No direct change in demand for services	No direct change in demand for services
What impacts will there be on planetary health? (e.g. climate change mitigation)	Denser, compact developments provide greater opportunities for climate change mitigation such as combined heat and power	No direct impacts	Much better opportunities for sustainable modes of transport to travel, positive for climate change mitigation	Much better opportunities for sustainable modes of transport to travel, positive for climate change mitigation	Opportunity for climate change mitigation in the design of schemes, linked to other policies in the Local Plan	N/A	Opportunity to support climate change mitigation infrastructure in the street scene	Opportunity to support climate change mitigation infrastructure

Who will it effect, and will there be particular impacts on certain vulnerable groups? (e.g. older people, young, disabled, low income)	Will effect all groups of society	Will effect all groups of society, equal opportunities to access services which will benefit deprived communities the most	Will effect all groups of society, equal opportunities to access services which will benefit deprived communities the most	Will effect all groups of society, equal opportunities to access services which will benefit deprived communities the most	Will effect all groups of society equally	N/A	Will effect all groups of society, equal opportunities to access services which will benefit deprived communities the most	Will effect all groups of society equally
How will negative impacts be mitigated?	Space standards will apply to ensure suitable living accommodation	No direct negative impacts	Design of infrastructure should not impact on overall amenity	Design of infrastructure should not impact on overall amenity	No direct negative impacts	N/A	Shared surfaces, careful management of pedestrians and cyclists etc for safety	Careful design of infrastructure required, not to affect amenity
How will positive impacts be enhanced?	Opportunities for combined services, climate change mitigation	Opportunities for shared services, avoid multiple trips.	Opportunities for climate change mitigation associated with green areas of infrastructure	Opportunities for climate change mitigation associated with green areas of infrastructure	Strong design makes memorable and distinct places which reinforces individually and localism	N/A	Opportunity to support climate change mitigation infrastructure in the street scene	Potential opportunity to support climate change mitigation infrastructure
Recommendations for policy changes.	No required changes to policy	No required changes to policy	No required changes to policy	No required changes to policy	No required changes to policy	No required changes to policy	No required changes to policy	No required changes to policy

5.6 Development Principles

5.6.1 The following section of the appraisal relates to the Development Principles chapter of the Local Plan, and the development of the following policies:

- Proposed Policy DEV1: General Development Considerations
- Proposed Policy DEV2: Comprehensive Development and Masterplanning
- Proposed Policy DEV3: Development Boundaries
- Proposed Policy DEV4: Retention of Sites of Community or Economic Value
- Proposed Policy DEV5: Development on Small Sites and Windfall Development
- Proposed Policy DEV6: Strategic Green Gaps

5.6.2 The policies in this chapter of the plan relate to the general principles of development, ranging from how sites should be considered in their entirety through masterplanning to the principles of development boundaries and strategic green gaps. The policies have been assessed through the SA based on in principle impacts. This is because some of the policies will be further detailed at the next stage of the Local Plan, such as the development boundaries and strategic green gaps which will be specifically designated and any changes to existing policy identified and justified. To consider reasonable alternatives at this stage an assessment has been made of the proposed policy against the position without a policy. This is considered appropriate as in many case the proposed policy has brought forward

(with some updating) existing policies in the current adopted plan (Core Strategy and DaSA). There are also some cases where there are no reasonable alternatives that can be identified, apart from the general absence of such a policy and as such this general principle has been applied for all policies contained in this chapter.

5.6.3 The following tables (Figures 26-28) provide a summary of the sustainability appraisal of the policy options as well as a HIA of the proposed policies. This demonstrates the strong sustainability benefits in moving forward with the proposed policies and the merits of proposed policies on health and wellbeing.

Figure 26 : Policy Options Comparison for Development Principles Chapter

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

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
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
SCORING	12	-3	19	-3	9	1	11	-5	9	-4	6	0

Figure 27 : Summary of SA Impacts for the Development Principles 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)
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 masterplanned. 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.

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)
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 which supports 10% of delivery on smaller sites	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 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 reply 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.

Figure 28 : Health Impact Assessment Framework for the Development Principles Chapter

HIA Screening	DEV1 - General Development Considerations	DEV2 – Comprehensive development and masterplanning	DEV3 – Development Boundaries	DEV4 – Retention of sites of Community and Economic Value	DEV5 – Development on Small Sites and Windfall Development	DEV6 – Strategic Green Gaps
Will the policy have a direct impact on health, mental health and wellbeing?	Yes	Yes	No	Yes	No	Yes
Will the policy have an impact on social, economic and environmental living conditions that would indirectly affect health?	Yes	Yes	Yes	Yes	Yes	Yes
Will the policy affect an individual's ability to improve their own health and wellbeing?	Yes	No	No	Yes	Yes	No
Will there be a change in demand for or access to health and social care services?	No	No	No	Yes	Yes	No
Full HIA Criteria	DEV1 - General Development Considerations	DEV2 – Comprehensive development and masterplanning	DEV3 – Development Boundaries	DEV4 – Retention of sites of Community and Economic Value	DEV5 – Development on Small Sites and Windfall Development	DEV6 – Strategic Green Gaps
What are the direct impacts on health, mental health and wellbeing? (eg. ill health, social exclusion, isolation, non-participation, safety)	Positive mental health and well-being, with no amenity and local character impacts	Ensures greater consideration of planning matters and impacts on health and wellbeing in larger development schemes. Avoids isolation, unsafe development etc	No specific direct impacts.	Positive impact on wellbeing and health if a community facility, for instance if used for leisure or recreation.	No direct impacts	Positive mental health and wellbeing by ensuring no inappropriate urban sprawl, access to greenspace and individual identity of major settlements
What are the indirect impacts on health, mental health and wellbeing? (eg. housing, transport, child development, education, employment opportunities, green space/nature, accessibility, air/noise/light quality and climate change adaption)	Acceptable amount of green space and ability to live well locally. Better quality of life through a good built and natural environment.	Good quality and well planned housing and employment, appropriate access to green space and positive environmental focus.	Creates a principle of not allowing inappropriate development outside of development boundaries, therefore positive on impact on amenity and quality of life	Retaining sites of community and economic value would have positive mental health impacts, through providing employment and education opportunities for instance	New housing and employment opportunities provides choice in market and ability for people to own their own home, good for mental health and general wellbeing	Access to greenspace, better air and noise quality, ability for areas to provide biodiversity net gain and contribute to enhanced landscape value.
What are the opportunities for self-improvement? (eg. ability to be physically active, choose healthy food, access to services/employment/education)	Ability to be physical active, positive mental health and less isolation from community.	Better access to green space, pathways and cycling routes etc promotes healthy living	Focusing development within development boundaries means better access to local services and facilities	Positive impact, people will have good access to services, facilities and education opportunities	Opportunity for homes to be located near to services and facilities and to access general community facilities	Ability to be physical active, positive mental health and less isolation from community.

What change in demand for services will there be? (eg. Primary Care, hospital care, community services, mental health, social services)	No direct impact.	Major development proposals will inevitably result in a greater demand for general services and facilities	Will not directly impact on demand for services and facilities	These are services protected by the policy, demand will be impacted if there is any loss in facilities.	New housing results in increased demand for services. Smaller dwellings might not result in need for developer contributions	No direct impact.
What impacts will there be on planetary health? (e.g. climate change mitigation)	No direct impact.	Opportunities for climate change mitigation to be taken account of through effective masterplanning	No direct impact.	No direct impact.	No direct impact.	Positive impacts on the environment through protecting green areas.
Who will it effect, and will there be particular impacts on certain vulnerable groups? (e.g. older people, young, disabled, low income)	Clear ability for all of society to live in a home for their lifetime that meets their needs	No specific impacts on certain vulnerable groups. Ability for all to live in an appropriately planned development.	No specific impacts on certain vulnerable groups.	Potentially, some of these community facilities protected may be important hubs for vulnerable groups	Clear ability for all of society to live in a home for their lifetime that meets their needs	No specific impacts on certain vulnerable groups.
How will negative impacts be mitigated?	Other supportive policies should reduce any negative impact on amenity and development	No negative impacts identified	Does limit development opportunities, but they would; be limited anyways due to constraints and suitability and impact of location	Opportunities for other forms of development are identified in the Council's Draft HELAA including affordable housing and wider housing opportunities	Good quality design and live well locally policies would support appropriate higher density development on smaller sites.	The only negatives would be inability for certain type of development to take place, but this is inappropriate in this location so not a major factor in the assessment.
How will positive impacts be enhanced?	Supportive Live well locally policies within the Local Plan	Supportive Live well locally policies within the Local Plan	Supportive Live well locally policies within the Local Plan	Wider social benefits in retaining community and economic facilities	Same as above, good supportive design policies will ensure better quality of living	Opportunities for enhancement to landscapes, such as biodiversity net gain
Recommendations for policy changes.	No policy changes required	No policy changes required	No policy changes required	No policy changes required	No policy changes required	No policy changes required

5.7 Health and Wellbeing

5.7.1 The following section of the appraisal relates to the Health and Wellbeing chapter of the Local Plan, and the development of the following policies:

- Proposed Policy HWB1: Supporting Health and Wellbeing
- Proposed Policy HWB2: Health Impact Assessments
- Proposed Policy HWB3: Reducing Harmful Impacts on Health

- Proposed Policy HWB4: Community Facilities and Services
- Proposed Policy HWB5: Green and Blue Infrastructure
- Proposed Policy HWB6: Public Rights of Way
- Proposed Policy HWB7: Combe Valley Countryside Park

5.7.2 The policies in this chapter of the plan relate to specific issues under a wider health and wellbeing remit which stretches across the entire Local Plan as a golden thread. The seven policy areas stretch from general consideration to support health and wellbeing to include a new policy on Health Impact Assessments as well as focus on the specific types of development that could have harmful impacts on health. Other policy areas in this chapter include areas of open space, designated sites and public rights of way which all contribute positively to health and wellbeing.

5.7.3 The Policy Area Options and Alternatives are presented below and in more detail in the Background Paper:

Policy Area 1: Health and Wellbeing

Policy Option 1A: Provision and Improvement for Health Care and Community Wellbeing

Policy Area 2: Health Impact Assessments (HIA)

Policy Option 2A: HIAs on all non-domestic applications

Policy Option 2B: HIAs on all major applications

Policy Option 2C: HIAs on all largescale applications

Policy Option 2D: HIAs within deprived areas

Policy Option 2E: No requirement for a HIA

Policy Area 3: Reducing harmful impacts on health

Policy Option 3A: Restricting hot food takeaways in Sidley District Centre (carry forward existing policy)

Policy Option 3B: Restricting hot food takeaways around schools and parks

Policy Option 3C: reducing harmful impacts on health through a limit on various uses

Policy Area 4: Community Facilities

Policy Option 4A: Community facilities and services

Policy Area 5: Green and Blue Infrastructure

Policy Option 5A: Green and Blue Infrastructure

Policy Area 6: Public Rights of Way

Policy Option 6A: Public Rights of Way

Policy Area 7: Combe Valley Countryside Park

Policy Option 7A: Combe Valley Countryside Park

5.7.4 The following tables (Figures 29-31) provide a summary of the sustainability appraisal of the policy options as well as a HIA of the proposed policies. This demonstrates the strong sustainability benefits in moving forward with the proposed policies and the merits of proposed policies on health and wellbeing.

Figure 29 : Policy Options Comparison for Health and Wellbeing Chapter

SA Objective / Draft Policies	1A	2A	2B	2C	2D	2E	3A	3B	3C	4A	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.	○	+	+	+	+	+	○	○	○	○	○	○	○

SA Objective / Draft Policies	1A	2A	2B	2C	2D	2E	3A	3B	3C	4A	5A	6A	7A
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	9	28	28	16	16	16	1	1	2	5	9	7	7

Figure 30 : Summary of SA Impacts for the Health and Wellbeing 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)
1A	Yes, overall positive impacts	+	Permanent	Long Term	Yes, live well locally policies and other health and wellbeing chapter policies.	This policy option will be carried forward in proposed Policy HWB1 - The long term impacts are on many of the social objectives of the SA, with key principles to enhance design of development and ensure people can give well locally in high quality safe environments
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	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

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)
					the most effective policy that is capable of being implemented. This will further amplify the impact of this policy.	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 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 – 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 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.

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)
4A	Yes, positive impacts overall	+	Permanent	Long Term	Direct synergies between community policy in development principles section, addition of text n 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.
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.

Figure 31 : Health Impact Assessment Framework for the Health and Wellbeing Chapter

HIA Screening	HWB1 – Supporting health and wellbeing	HWB2 – Health Impact Assessments	HWB3 – Reducing harmful impacts on health	HWB4 – Community facilities and services	HWB5 – Green and Blue infrastructure	HWB6 – Public Rights of Way	HWB7 – Combe Valley Countryside Park
Will the policy have a direct impact on health, mental health and wellbeing?	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Will the policy have an impact on social, economic and environmental living conditions that would indirectly affect health?	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Will the policy affect an individual's ability to improve their own health and wellbeing?	Yes	Yes	Yes	Yes	Yes	Yes	Yes

HIA Screening	HWB1 – Supporting health and wellbeing	HWB2 – Health Impact Assessments	HWB3 – Reducing harmful impacts on health	HWB4 – Community facilities and services	HWB5 – Green and Blue infrastructure	HWB6 – Public Rights of Way	HWB7 – Combe Valley Countryside Park
Will there be a change in demand for or access to health and social care services?	Yes	Yes	Yes	Yes	No	No	No
Full HIA Criteria	HWB1	HWB2	HWB3	HWB4	HWB5	HWB6	HWB7
What are the direct impacts on health, mental health and wellbeing? (eg. ill health, social exclusion, isolation, non-participation, safety)	Fully compatible policy, supporting principles of health and wellbeing. Direct positive impact on all elements	The policy allows for such considerations on health and wellbeing to be made. It doesn't directly result in specific impacts.	Significant positive impacts, reduces opportunity for harmful impacts on health, reduces issues on mental health and isolation etc	Positive impacts that relate to social inclusion, ability to access facilities and services, having them near to residents therefore feeling close to society.	Ability to promote and strengthen areas of open space and infrastructure, positive more mental health and physical activity.	Ability to protect and promote public rights of way for recreational benefit and therefore health and wellbeing of community.	Ability to protect important open space for recreational benefit and therefore health and wellbeing. Provides accessible and inclusive space for all to enjoy
What are the indirect impacts on health, mental health and wellbeing? (eg. housing, transport, child development, education, employment opportunities, green space/nature, accessibility, air/noise/light quality and climate change adaption)	Very positive, Opportunity through site allocations (at next stage of the Plan) to address infrastructure to support health and wellbeing	The policy allows for all consideration of health, mental health and wellbeing to be made and to consider the wider impacts and ways applications can be improved to promote health and wellbeing	Less indirect impacts as this policy area is meant to directly relate to the impacts of specific types development on general health and wellbeing. It will have positive impacts health initiatives of community groups and schools for instance.	Ability to cater for facilities and services which help will everyday life of society, eg community groups, child care and education,	Also allows for climate change mitigation when linked to biodiversity net gain and open space improvements etc	Opportunities for better education in relation to walkways and looking after areas of open space etc	Opportunities for better education in relation to wildlife areas, sensitive environmental areas and areas of open space etc. Linked opportunities to biodiversity net gain and open space improvements.
What are the opportunities for self-improvement? (eg. ability to be physically active, choose healthy food, access to services/employment/education)	Very positive, opportunities to reduce health inequalities and lead physically active lifestyles	It does not directly result in an impact, as this is a policy assessing the overall impacts and strengthening the positive gains.	Opportunities to choose healthier food, to not be tempted by gambling and other activities that impact on mental health	Ability to access services, employment and education	Ability to physically active and access green space, also to learn about the local natural environment	Ability to physically active and access green space	Ability to physically active and access green space, also to learn about the local natural environment.
What change in demand for services will there be? (eg. Primary Care, hospital care, community services, mental health, social services)	This is a supportive policy to allow for new facilities to be provided.	The HIA might identify the need for supporting services or how health infrastructure is capable of supporting development to assist longer term infrastructure planning	Should reduce the impact on health care services by promoting healthy eating practices and discouraging harmful impacts n health	This is a supportive policy to allow for new facilities to be provided.	No direct change in demand for services	No direct change in demand for services	No direct change in demand for services
What impacts will there be on planetary health? (e.g. climate change mitigation)	Positive impacts, supports climate change mitigation	Overall positive impacts with the intentions of HIA	No significant impacts	No significant impacts	Opportunity to deliver climate change mitigation	No significant impacts	Opportunity to deliver climate change mitigation

HIA Screening	HWB1 – Supporting health and wellbeing	HWB2 – Health Impact Assessments	HWB3 – Reducing harmful impacts on health	HWB4 – Community facilities and services	HWB5 – Green and Blue infrastructure	HWB6 – Public Rights of Way	HWB7 – Combe Valley Countryside Park
Who will it effect, and will there be particular impacts on certain vulnerable groups? (e.g. older people, young, disabled, low income)	Significant positive impact for all of society.	HIA will impact all members of community and assess the wider health benefits for all	Deprived or low income communities may be impacted, as fast food tends to be cheaper, more accessible.	There will be greater access to all members of community, ability for all to be positively affected	Not all areas of green open space may be accessible to the public, but there will be some that is accessible to all members of community.	Disabled communities will sometimes find public rights of way difficult to navigate because of features of the natural environment, eg uneven ground, styles etc	All members of society will be able to access and enjoy the designated park
How will negative impacts be mitigated?	No negative impacts identified	Negative impacts will be identified and addressed through the HIA process.	No negative impacts identified	No negative impacts identified	No negative impacts identified	No negative impacts identified	No negative impacts identified
How will positive impacts be enhanced?	The purpose of the policy is to support the enhancement of positive impacts on health and wellbeing	Positive impacts will be identified and sought to be enhanced through the HIA process.	The purpose of the policy is to reduce the negative impacts on health and wellbeing	Removing permitted development rights means that development should stay as a community facility, so longer term positive impact	Opportunities for creation of BNG and for some areas to accessible for recreational purposes	No identified enhancements.	Opportunities for effective management of the land to ensure positive benefits are enhanced
Recommendations for policy changes.	No changes required	No changes required	No changes required	No changes required	No changes required	No changes required	No changes required

5.8 Infrastructure

5.8.1 The following section of the appraisal relates to the Infrastructure chapter of the Local Plan, and the development of the following policies:

- Proposed Policy INF1: Strategic Infrastructure Requirements
- Proposed Policy INF2: Digital Connectivity

5.8.2 The two policies in this chapter of the plan relate to the requirements on the timing and delivery of infrastructure along with safeguarding and protecting important infrastructure from any loss or impact through development proposals. The second specific policy relates to digital connectivity specifically. Specific infrastructure requirements will be identified for identified sites when the Council progresses site allocations at the next stage of the Local Plan. At this stage the Council has prepared a draft Infrastructure Delivery Plan to highlight the known infrastructure requirements for the Plan to date as a basis for feedback and engagement with infrastructure providers at the consultation stage.

5.8.3 The Policy Area Options and Alternatives are presented below and in more detail in the Infrastructure Background Paper:

Policy Area 1: Supporting Infrastructure across the District

Policy Option 1A: infrastructure delivery across the district

Policy Area 2: Timing and Delivery of Infrastructure

Policy option 2A: a requirement to demonstrate that necessary infrastructure will be delivered

Policy Option 2B: a requirement to demonstrate that necessary infrastructure will be delivered

Policy Area 3: Safeguarding strategic infrastructure

Policy Option 3A: safeguarding strategic infrastructure

Policy Area 4: Digital Connectivity

Policy Option 4A: Fibre to the Premise (FTTP) for all major developments

Policy Option 4B: FTTP agreed on a site by site basis through S106 agreements

Policy Option 4C: safeguarding strategic infrastructure

5.8.4 The following tables (Figures 32-34) provide a summary of the sustainability appraisal of the policy options as well as a HIA of the proposed policies. This demonstrates the strong sustainability benefits in moving forward with the proposed policies and the merits of proposed policies on health and wellbeing.

Figure 32 : Policy Options Comparison for the Infrastructure Chapter

SA Objective / Draft Policies	1A	2A	2B	3A	4A	4B	4C
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.	+	+	+	+	○	○	○

SA Objective / Draft Policies	1A	2A	2B	3A	4A	4B	4C
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	7	7	7	5	5

Figure 33 : Summary of SA Impacts for the Infrastructure 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)
1A	Yes, positive overall impact	+	Permanent	Long Term	Yes, synergies with community and facilities policies which will amplify the effect.	Carry forward Policy option, to be combined with timing and safeguarding in proposed Policy INF1 – There are strong long term sustainability benefits with the draft policy, ensuring that infrastructure is established in consultation with infrastructure bodies.
2A	Yes, positive overall impact	+	Permanent	Long Term	Yes, supports the general development policies especially in relation to housing and the economy. Strong infrastructure policies will amplify the	Carry forward Policy option, to be combined with infrastructure delivery and safeguarding in proposed Policy INF1 - This policy option seeks to set a relatively high bar for evidence that the required infrastructure needed to support new development will be in place. It is felt that, as with the policy option above, one overarching policy on infrastructure is best. This ensures that all elements of

					sustainability benefits of development.	infrastructure provision can be considered together, amplifying the overall sustainability impacts
2B	Yes, positive overall impact	+	Permanent	Long Term	Yes, supports the general development policies especially in relation to housing and the economy. Strong infrastructure policies will amplify the sustainability benefits of development.	Policy option not carried forward - This policy option sets a weaker requirement on new development and ensuring the infrastructure provision is in place. As such, it is felt that this policy is not to be carried forward
3A	Yes, positive overall impact	+	Permanent	Long Term	Yes, synergies with community and facilities policies which will amplify the effect.	Carry forward Policy option, to be combined with infrastructure delivery and timing in proposed Policy INF1- As with other policy options being combined into one, this policy option should also be brought into one overarching infrastructure policy. This ensures that all elements of infrastructure provision can be considered together, amplifying the overall sustainability impacts
4A	Yes, positive overall impact	+	Permanent	Long Term	Yes, supports the general development policies especially in relation to housing and the economy. Strong infrastructure policies will amplify the sustainability benefits of development.	Carry forward policy Option to proposed Policy INF2 - Out of the three policy options on digital connectivity, this policy option is the strongest in its requirements and therefore is recommended to carry forward. It scores highest in the sustainability assessment and provides the best option longer term.
4B	Yes, positive overall impact	+	Permanent	Long Term	Yes, supports the general development policies especially in relation to housing and the economy. Strong infrastructure policies will amplify the sustainability benefits of development.	Do not carry forward - This policy option is weaker in its requirements than the first policy option, and therefore is not recommended
4C	Yes, positive overall impact	+	Permanent	Long Term	Yes, supports the general development policies especially in relation to housing and the economy. Strong infrastructure policies will amplify the sustainability benefits of development.	Do not carry forward This policy option is weaker in its requirements than the first policy option, and therefore is not recommended.

Figure 34 : Health Impact Assessment Framework for the Infrastructure Chapter

HIA Screening	INF1 – Strategic Infrastructure Requirements	INF2 – Digital Connectivity
Will the policy have a direct impact on health, mental health and wellbeing?	Yes	No
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	No
Will there be a change in demand for or access to health and social care services?	Yes	No
Full HIA Criteria	INF1 - Strategic Infrastructure Requirements	INF2 - Digital Connectivity
What are the direct impacts on health, mental health and wellbeing? (eg. ill health, social exclusion, isolation, non-participation, safety)	Positive policy which allows the timely delivery of infrastructure to support new development. Ensures participation in society i.e delivery of community facilities and services, sport and recreation infrastructure.	No direct impacts
What are the indirect impacts on health, mental health and wellbeing? (eg. housing, transport, child development, education, employment opportunities, green space/nature, accessibility, air/noise/light quality and climate change adaption)	Allows local residents to live well locally and have access to education and, facilities and open space that they will require. Also allows opportunities for climate change measures such having the correct power and energy infrastructure for solar panels, wind turbines etc	Indirect impacts include ability to access internet for day to day needs and avoids isolation. This is positive for mental health and for education and employment opportunities for residents, i.e. ability to work successfully from home.
What are the opportunities for self-improvement? (eg. ability to be physically active, choose healthy food, access to services/employment/education)	Allows the community to participate in physical activities and access services. Sustainable public transport infrastructure is fundamental to this.	Better access to services, employment and education on-line
What change in demand for services will there be? (eg. Primary Care, hospital care, community services, mental health, social services)	This is the purpose of the policy to respond to and support the changing needs of infrastructure provision.	None identified
What impacts will there be on planetary health? (e.g. climate change mitigation)	The policy will allow for the provision of infrastructure to support climate change mitigation, and therefore overall positive impacts on planetary health and responding to climate change	Could assist with working from home, avoid commuting to work and impacts on climate change/the environment
Who will it effect, and will there be particular impacts on certain vulnerable groups? (e.g. older people, young, disabled, low income)	Positive policy for all of the community, will enable the provision of infrastructure to meet the needs of all.	Improved digital connectivity will be positive for all community groups, but there may be still members of community who are in deprived areas and do not have access to the internet.
How will negative impacts be mitigated?	Any negative impacts on the environment will be mitigated through other policies in the plan. Some essential infrastructure for instance though may be allowed where necessary in the functional floodplain.	Internet connectivity is not the solution to all society interactions, there should still be availability of facilities and services close to home so people can meet face to face and lead their life out in the community.
How will positive impacts be enhanced?	Positive impacts will be enhanced through other supporting policies in the plan, such as policies in the live well locally and green to the core chapters.	Greater positive impacts on ability to lead life remotely, but this could result in some form of isolation from society.

HIA Screening	INF1 – Strategic Infrastructure Requirements	INF2 – Digital Connectivity
Recommendations for policy changes.	No changes required	No changes required

5.9 Housing

5.9.1 The following section of the appraisal relates to the Housing chapter of the Local Plan, and the development of the following policies:

- Proposed Policy HOU1: Mixed and Balanced Communities
- Proposed Policy HOU2: Affordable Housing
- Proposed Policy HOU3: 100% Affordable Housing Developments
- Proposed Policy HOU4: Allocating Sites for Wholly or Substantially Affordable Housing
- Proposed Policy HOU5: Rural Exception Sites
- Proposed Policy HOU6: Sub-division of Dwellings, and Houses of Multiple Occupation (HMOs)
- Proposed Policy HOU7: Residential Internal Space Standards
- Proposed Policy HOU8: Access Standards
- Proposed Policy HOU9: Specialist Housing for Older People
- Proposed Policy HOU10: Residential Care Homes for Older People
- Proposed Policy HOU11: Gypsies, Travellers and Travelling Showpeople Criteria
- Proposed Policy HOU12: Self-Build and Custom Housebuilding
- Proposed Policy HOU13: New Dwellings in the Countryside
- Proposed Policy HOU14: External Residential Areas
- Proposed Policy HOU15: Extensions to Residential Gardens
- Proposed Policy HOU16: Extensions, Alterations and Outbuildings
- Proposed Policy HOU17: Annexes
- Proposed Policy HOU18: Boundary Treatments and Means of Enclosure
- Proposed Policy HOU19: Accesses and Drives

5.9.2 The policies in this chapter of the plan relate to important housing matters that are strategic in nature such as affordable housing delivery, through to development management style policies related to matters such as access standards, extensions and annexes. Each individual policy area has a series of policy options (some only one if there are no identified alternatives) and some of these policy options will be carried forward to create proposed policies in the Local Plan. Several of the policy areas themselves have also been combined to create one comprehensive policy that includes multiple areas to avoid an

excessive amount of policies in the Local Plan. The separation of the themes has helped to assess the sustainability merits of each part or theme, so show how this has come together to form the final proposed policies in the Local Plan.

5.9.3 The Policy Area Options and Alternatives are presented below and in more detail in the Housing Background Paper:

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 of 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.

Specialist Housing need: Housing for Older People

Policy Area 12: Specialist Housing 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: Housing for Disabled People and 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 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

Specialist Housing Need: Live-Work Units

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

Specialist Housing Need: Gypsies and Travellers

Policy Area 26: Criteria-based policy to guide planning applications (update to Core Strategy Policy LHN6)

Policy Option 26A: Do not include a criteria based policy, instead rely on site allocations.

Policy Option 26B: Update 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

Second Homes and Dwellings as Holiday Lets

Policy Area 31: Housing for Families with Children

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

Internal Space Standards

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 “studies” 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

5.9.4 The following tables (Figures 35-43) provide a summary of the sustainability appraisal of the policy options as well as a HIA of the proposed policies. This demonstrates the strong sustainability benefits in moving forward with the proposed policies and the merits of proposed policies on health and wellbeing.

Figure 35 : Policy Options Comparison for the Housing Chapter (Part 1)

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

SA Objective / Draft Policies	1A	1B	1C	2A	2B	2C	3A	3B	3C	4A	4B	4C	5A	5B	5C	6A	6B
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

Figure 36 : Policy Options Comparison for the Housing Chapter (Part 2)

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

SA Objective / Draft Policies	7A	7B	7C	7D	8A	8B	8C	9A	9B	10A	10B	11A	11B	12A	12B	12C
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

Figure 37 : Policy Options Comparison for the Housing Chapter (Part 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

SA Objective / Draft Policies	13A	13B	14A	14B	15A	15B	16A	16B	17A	17B	18A	18B	18C	19A	19B	20A	20B
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

Figure 38 : Policy Options Comparison for the Housing Chapter (Part 4)

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

SA Objective / Draft Policies	21A	21B	22A	23A	23B	24A	24B	25A	26A	26B	27A	27B	28A	28B	29A	29B
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

Figure 39 : Policy Options Comparison for the Housing Chapter (Part 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

SA Objective / Draft Policies	30A	30B	31A	31B	31C	32A	32B	32C	33A	33B	33C	34A	34B	34C	35A	35B
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

Figure 40 : Policy Options Comparison for the Housing Chapter (Part 6)

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

SA Objective / Draft Policies	36A	36B	37A	37B	38A	38B	39A	39B
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

Figure 41 : Summary of SA Impacts for the Housing 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)
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

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)
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

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)
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 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.

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)
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
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	Not carried forward - This would not reflect the recommendations of the HEDNA which suggests that smaller dwellings are required throughout the district

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)
					doesn't not align exactly with evidence base in the HEDNA.	
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	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.

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)
					positive option to address housing land supply.	
11A	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. Same sustainability score as option 11B but not advisable to carry forward as these issues could be a carried forward in site allocations	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 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

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)
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 wellbeing because of significant benefits to the district's growing elderly population.	+	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. 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

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)
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 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)
						policy. It is not considered there is a need for a separate policy for SCHB exception sites
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.

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)
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. 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 and elements of HO2, HO5 - This would address the general concern of a lack of affordable housing for rural workers in the rural areas
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

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)
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

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)
						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 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

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)
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
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

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)
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

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)
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

Figure 42 : Health Impact Assessment Framework for the Housing Chapter – Part 1

HIA Screening	HOU1 – Mixed and balanced communities	HOU2 – Affordable Housing	HOU3 – 100% Affordable housing developments	HOU4 – Allocating sites for wholly or substantial affordable housing	HOU5 – Rural Exception Sites	HOU6 – Subdivision of Dwellings and HMOs	HOU7 – Residential Internal Space Standards	HOU8 – Access Standards	HOU9 – Specialist Housing for Older People
Will the policy have a direct impact on health, mental health and wellbeing?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Will the policy have an impact on social, economic and environmental living conditions that would indirectly affect health?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Will the policy affect an individual's ability to improve their own health and wellbeing?	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes
Will there be a change in demand for or access to health and social care services?	Yes	Yes	Yes	Yes	Yes	Yes	No	No	Yes
Full HIA Criteria	HOU1 – Mixed and balanced communities	HOU2 – Affordable Housing	HOU3 – 100% Affordable housing developments	HOU4 – Allocating sites for wholly or substantial affordable housing	HOU5 – Rural Exception Sites	HOU6 – Subdivision of Dwellings and HMOs	HOU7 – Residential Internal Space Standards	HOU8 – Access Standards	HOU9 – Specialist Housing for Older People
What are the direct impacts on health, mental health and wellbeing? (eg. ill health, social exclusion, isolation, non-participation, safety)	Helps meet housing needs, which in turn helps ensure good health and wellbeing for all community	Allows members of society to access the housing market, overall positive impact on wellbeing	Allows members of society to access the housing market, overall positive impact on wellbeing	Allows members of society to access the housing market, overall positive impact on wellbeing	Allows members of society to access the housing market, overall positive impact on wellbeing	Could be some direct impacts, helps manage impacts on ill health and wellbeing (links to space standards etc)	Too small or cramped conditions can impact on the health and wellbeing of person, as well as poor mental health	Inaccessible or unadaptable space will have a negative direct impact on health and wellbeing, particularly mental health	Better health care and support for elderly populations, removes isolation and non-participation in society
What are the indirect impacts on health, mental health and wellbeing? (eg. housing, transport, child development, education, employment opportunities, green)	Creates good wellbeing with good mix of dwellings,	Opportunities to live in mixed communities, and ultimately own	Opportunities to live in mixed communities, and ultimately own some	Opportunities to live in mixed communities, and ultimately own some	Opportunities to live in mixed communities, and ultimately own some	Greater opportunities to access housing market and better	Ability to lead life and work from home comfortably, good	Ability to live in your home for a lifetime, adapt it to changing needs. Allows	Suitable housing provision for the elderly with supported care

space/nature, accessibility, air/noise/light quality and climate change adaption)	minimises mental health impacts, good access to services and facilities	some of the house through shared ownership model etc, positive mental health aspect	of the house through shared ownership model etc, positive mental health aspect	of the house through shared ownership model etc, positive mental health aspect	of the house through shared ownership model etc, positive mental health aspect	consideration of impacts on residential amenity.	amenity and child development.	working from home and ability to lead an effective healthy life.	where required. Also provides open space, amenity space and communal living to avoid isolation
What are the opportunities for self-improvement? (e.g. ability to be physically active, choose healthy food, access to services/employment/education)	Ability to feel part of community, access to services and employment, inclusive society	Ability to own part of a home, better opportunity to access services and facilities	Ability to own part of a home, better opportunity to access services and facilities	Ability to own part of a home, better opportunity to access services and facilities	Ability to own part of a home, better opportunity to access services and facilities	Ability to access services and access housing market	Ability to work from home.	Ability to work from home and access individual needs.	Ability to be physically active, be supported in care, access to services, and group activities.
What change in demand for services will there be? (eg. Primary Care, hospital care, community services, mental health, social services)	New built communities results in increase need for healthcare facilities	New built communities results in increase need for healthcare facilities	New built communities results in increase need for healthcare facilities	New built communities results in increase need for healthcare facilities	New built communities results in increase need for healthcare facilities	New built communities results in increase need for healthcare facilities	No direct change from this policy alone.	No direct change from this policy alone.	Resulting healthcare needs for elderly either on or off site, hospital care and community support services etc
What impacts will there be on planetary health? (e.g. climate change mitigation)	Larger scale developments, opportunity for climate change mitigation	Larger scale developments, opportunity for climate change mitigation	Larger scale developments, opportunity for climate change mitigation	Larger scale developments, opportunity for climate change mitigation	Larger scale developments, opportunity for climate change mitigation	Limited opportunities for climate change mitigation	No direct change from this policy alone.	No direct change from this policy alone.	Larger scale developments, opportunity for 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)	A positive policy for all in society, affordable housing beneficial for those who cannot afford access to market housing	A positive policy for all in society, affordable housing beneficial for those who cannot afford access to market housing	A positive policy for all in society, affordable housing beneficial for those who cannot afford access to market housing	A positive policy for all in society, affordable housing beneficial for those who cannot afford access to market housing	A positive policy for all in society, affordable housing beneficial for those who cannot afford access to market housing	A positive policy for all in society, affordable housing beneficial for those who cannot afford access to market housing	A positive policy for all in society, will directly impact those communities at the lower end of property market only able to afford smaller dwellings.	A positive policy for all in society, will directly impact those with particular needs for adaptation (wheelchair users, mobility issues, elderly etc)	A positive policy to create good developments for older people.
How will negative impacts be mitigated?	Other housing and environmental policies will safeguard against negative impacts	Other housing and environmental policies will safeguard against negative impacts	Other housing and environmental policies will safeguard against negative impacts	Other housing and environmental policies will safeguard against negative impacts	Other housing and environmental policies will safeguard against negative impacts	Space standards will help mitigate inappropriate development	Space standards will help mitigate inappropriate development	The access standards will help mitigate inappropriate development	Other housing and environmental policies will safeguard against negative impacts
How will positive impacts be enhanced?	Supportive policies in the live well locally chapter will amplify the	Supportive policies in the live well locally chapter will amplify the	Supportive policies in the live well locally chapter will amplify	Supportive policies in the live well locally chapter will amplify	Supportive policies in the live well locally chapter will amplify	Supportive policies in the live well locally chapter will amplify	Supportive policies in the live well locally chapter will amplify	Supportive policies in the live well locally chapter will amplify	Supportive policies in the live well locally chapter will amplify

	positive impacts of the policy	positive impacts of the policy	the positive impacts of the policy	the positive impacts of the policy	the positive impacts of the policy	the positive impacts of the policy	the positive impacts of the policy	the positive impacts of the policy	the positive impacts of the policy
Recommendations for policy changes.	No changes required	No changes required	No changes required	No changes required	No changes required	No changes required	No changes required	No changes required	No changes required

Figure 43 : Health Impact Assessment Framework for the Housing Chapter – Part 2

HIA Screening	HOU10 – Residential care homes for older people	HOU11 – Gypsies, Travellers and Traveling Showpeople Criteria	HOU12 – Self Build and Custom Housebuilding	HOU13 – New Dwellings in the Countryside	HOU14 – External Residential Areas	HOU15 – Extensions to Residential Gardens	HOU16 – Extensions, Alterations and Outbuildings	HOU17 - Annexes	HOU18 – Boundary Treatments and Means of Enclosure	HOU19 – Accesses and Drives
Will the policy have a direct impact on health, mental health and wellbeing?	Yes	Yes	Yes	Yes	No	No	No	No	No	No
Will the policy have an impact on social, economic and environmental living conditions that would indirectly affect health?	Yes	Yes	Yes	Yes	Yes	No	No	No	No	No
Will the policy affect an individual's ability to improve their own health and wellbeing?	Yes	Yes	Yes	Yes	Yes	No	No	No	No	No
Will there be a change in demand for or access to health and social care services?	Yes	Yes	Yes	Yes	No	No	No	No	No	No
Full HIA Criteria	HOU10 – Residential care homes for older people	HOU11 – Gypsies, Travellers and Traveling Showpeople Criteria	HOU12 – Self Build and Custom Housebuilding	HOU13 – New Dwellings in the Countryside	HOU14 – External Residential Areas	HOU15 – Extensions to Residential Gardens	HOU16 – Extensions, Alterations and Outbuildings	HOU17 - Annexes	HOU18 – Boundary Treatments and Means of Enclosure	HOU19 – Accesses and Drives
What are the direct impacts on health, mental health and wellbeing? (eg. ill health, social exclusion, isolation, non-participation, safety)	Better health care and support for elderly populations, removes isolation and non-participation in society	New housing provision opportunity for the traveling community has direct positive impacts on health and wellbeing, inclusion and participation in society	New housing provision opportunity for all in the community has direct positive impacts on health and wellbeing, inclusion and participation in society	New housing provision opportunity for all in the community has direct positive impacts on health and wellbeing, inclusion and participation in society	Ability to live a healthy life, eg, cycle storage, outdoor space for recreation and amenity etc	N/A	N/A	N/A	N/A	N/A
What are the indirect impacts on health, mental health and wellbeing? (eg. housing,	Suitable housing provision for	Avoids isolation, integration into	Access to services and facilities,	Access to services and facilities,	Indirect impacts include ability to	N/A	N/A	N/A	N/A	N/A

transport, child development, education, employment opportunities, green space/nature, accessibility, air/noise/light quality and climate change adaption)	the elderly with supported care where required. Also provides open space, amenity space and communal living to avoid isolation	society in sustainable locations, education and employment opportunities	education, employment opportunities	education, employment opportunities	deliver climate change adaptation. E.g. electric vehicle charging,					
What are the opportunities for self-improvement? (eg. ability to be physically active, choose healthy food, access to services/employment/education)	Ability to be physically active, be supported in care, access to services, and group activities.	Ability to be physically active and improve access to services	Ability to be physically active and improve access to services	Ability to be physically active and improve access to services	Ability to be physical active in green external areas	N/A	N/A	N/A	N/A	N/A
What change in demand for services will there be? (eg. Primary Care, hospital care, community services, mental health, social services)	Resulting healthcare needs for elderly either on or off site, hospital care and community support services etc	Resulting healthcare needs, hospital care and community support services etc	New built communities results in increase need for healthcare facilities	New built communities results in increase need for healthcare facilities	Not directly related to growth,	N/A	N/A	N/A	N/A	N/A
What impacts will there be on planetary health? (e.g. climate change mitigation)	Larger scale developments, opportunity for climate change mitigation	No significant impact	Larger scale developments, opportunity for climate change mitigation	Larger scale developments, opportunity for climate change mitigation	Opportunity for climate change mitigation, such as EVC	N/A	N/A	N/A	N/A	N/A
Who will it effect, and will there be particular impacts on certain vulnerable groups? (e.g. older people, young, disabled, low income)	A positive policy to create good developments for older people.	Specific policy for the traveller community to assist in meeting their needs	Greater opportunities for those in society to build their own home	Ability to access services and access housing market	A positive policy for all of the community, especially in locations which typically have smaller amounts of amenity space	N/A	N/A	N/A	N/A	N/A
How will negative impacts be mitigated?	Other housing and environmental policies will safeguard	Other housing and environmental policies will safeguard	Other housing and environmental policies will safeguard against negative impacts	Other housing and environmental policies will safeguard against negative impacts	Other housing and environmental policies will safeguard against negative impacts	N/A	N/A	N/A	N/A	N/A

	against negative impacts	against negative impacts								
How will positive impacts be enhanced?	Supportive policies in the live well locally chapter will amplify the positive impacts of the policy	Supportive policies in the live well locally chapter will amplify the positive impacts of the policy	Supportive policies in the live well locally chapter will amplify the positive impacts of the policy	Supportive policies in the live well locally chapter will amplify the positive impacts of the policy	Supportive policies in the live well locally chapter will amplify the positive impacts of the policy	N/A	N/A	N/A	N/A	N/A
Recommendations for policy changes.	No changes required	No changes required	No changes required	No changes required	No changes required	No changes required	No changes required	No changes required	No changes required	No changes required

5.10 Economy

5.10.1 The following section of the appraisal relates to the Health and Wellbeing chapter of the Local Plan, and the development of the following policies:

- Proposed Policy ECO1: Supporting New Employment Development
- Proposed Policy ECO2: Protecting Existing Employment Sites and Premises
- Proposed Policy ECO3: Designated Town Centres
- Proposed Policy ECO4: Retail and Leisure Impact Assessments
- Proposed Policy ECO5: Tourism Activities, Facilities and Accommodation
- Proposed Policy ECO6: Holiday Sites
- Proposed Policy ECO7: Agriculture Development and Forestry
- Proposed Policy ECO8: Agricultural Diversification
- Proposed Policy ECO9: Local Employment & Skills
- Proposed Policy ECO10: Equestrian Developments

5.10.2 The policies in this chapter of the plan have been proposed to support economic development in the district in relation to both the urban and rural environment and contain policies in relation to retail, town centres, leisure, tourism and agriculture. These policies have clear synergies with other policy areas in the Local Plan and these relationships are borne out in the sustainability appraisal and HIA below.

5.10.3 The Policy Area Options and Alternatives are presented below and in more detail in the Economy Background Paper:

Policy Area 1 – Setting development targets for employment development

Policy Option 1A: Establish employment development need figures 2020-2040 as identified through the HEDNA for the whole district

Policy Option 1B: Set out targets as above, but the target figure broken down for each sub-area.

Policy Option 1C: Do not set a target for employment development.

Policy Area 2 – Meeting employment need development targets through allocations – Please note that this has not been assessed in the SA/SEA as allocations have not currently been progressed at this stage of the plan making progress

Policy Area 3 – Meeting employment need through supportive policy

Policy Option 3A: Carry forward existing policy approach established in the Core Strategy

Policy Option 3B: Have no specific policy, but rely on the Development Boundaries as set out in the Development Strategy

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

Policy Option 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

Policy Option 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

Policy Option 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*

Policy Option 5B. As an alternative to the above policy option, to have no additional wording as part of town centre policy.

Policy Area 6 – Town Centre Hierarchy and Designated Areas

Policy Option 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

Policy Option 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

Policy Option 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

Policy Option 8A: Bring forward Core Strategy Policy EC6, in offering general support for proposals relating to tourism facilities, subject to criteria

Policy Option 8B: 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

Policy Option 8C: Do not provide policy protection against the loss of tourism uses as above.

Policy Option 8D: Bringing forward provision of Core Strategy Policy EC6 criterion (vi) to require “appropriate controls are in place that restrict occupancy to that

Policy Area 9 – Holiday sites

Policy Option 9A: Bring forward DaSA Policy EC2 Holiday Sites, subject to identified amendments

Policy Option 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.

5.10.4 The following tables (Figures 44-50) provide a summary of the sustainability appraisal of the policy options as well as a HIA of the proposed policies. This demonstrates the strong sustainability benefits in moving forward with the proposed policies and the merits of proposed policies on health and wellbeing.

Figure 44 : Summary assessment of employment policies (Options 1-5)

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

SA Objective / Draft Policies	1a	1b	1c	2a	2b	3a	3b	4a	4b	5a	5b
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

Figure 45 : Summary assessment of employment policies (Options 6-9)

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	-

SA Objective / Draft Policies	6a	6b	6c	7a	7b	8a	8b	8c	8d	9a	9b
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

Figure 46 : Summary assessment of employment policies (Options 10-13)

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

Figure 47 : Summary of SA Impacts of employment policies in the Local Plan

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.

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)
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.
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.	o	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.

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)
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.

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)
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.
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 policies 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.	o	No impact	N/A	Yes, green to the core and landscape policies 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 policies 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.

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)
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.

5.10.5 The 13 policy areas above have not directly translated into 13 specific policies in the Local Plan because of the synergies and overlaps which have been mentioned above. The proposed policies in the Local Plan and how they match to the proposed policy areas and the preferred options is summarised below, and detailed within the employment background paper.

Figure 48 : Summary of how Policy Areas and Options have translated into proposed policies in the Rother Local Plan.

Policy number and Title	Policy Areas that have combined to form the proposed policies
ECO1 - Supporting New Employment Development	Policy Area 3: Meeting employment need through supportive policy
	Policy Area 12: Agricultural Diversification
ECO2 - Protecting Existing Employment Sites and Premises	Policy Area 3: Meeting employment need through supportive policy
	Policy Area 4: Protecting existing site and premises of economic value
ECO3 - Designated Town Centres	Policy Area 5: Retail and Leisure Development Need

	Policy Area 6: Town Centre Hierarchy and Designated Areas
ECO4 - Retail and Leisure Impact Assessments	Policy Area 7: Retail & Leisure Impact Assessments
ECO5 - Tourism Activities, Facilities and Accommodation	Policy Area 8: Tourism Activities, Facilities and Accommodation
ECO6 - Holiday Sites	Policy Area 9: Holiday Sites
ECO7 - Agriculture Development and Forestry	Policy Area 11: Agriculture & Forestry
ECO8 - Agricultural Diversification	Policy Area 12: Agricultural Diversification
ECO9 - Local Employment & Skills	Policy Area 10: Local Employment & Skills Plans
ECO10 - Equestrian Developments	Policy Area 13: Equestrian Developments
Overall Spatial Development Strategy	Policy Area 1: Setting development targets for employment development
DEV4 - Retention of Sites of Community or Economic Value	Policy Area 4: Protecting existing site and premises of economic value
Future stage Local Plan policy	Policy Area 2: Meeting employment need development targets through allocations

Figure 49: Crude Summary Appraisal of Proposed Employment Policies

SA Objective / Draft Policies	ECO1	ECO2	ECO3	ECO4	ECO5	ECO6	ECO7	ECO8	ECO9	ECO10
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	-	-	o	+
3. The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation)	-	o	+	+	-	-	o	-	o	o
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	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
7. The health and well-being of the population is improved and inequalities in health are reduced.	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

SA Objective / Draft Policies	ECO1	ECO2	ECO3	ECO4	ECO5	ECO6	ECO7	ECO8	ECO9	ECO10
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
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	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
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	+	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
20. Road congestion levels are reduced and there is less car dependency and greater travel choice.	o	o	+	+	-	-	o	o	o	+
SCORING	2	9	10	9	3	1	1	1	7	4

Figure 50 : Health Impact Assessment Framework for the Economy Chapter

HIA Screening	ECO1 – Supporting new Employment Development	ECO2 – Protecting existing Employment sites and premises	ECO3 – Designated Town Centres	ECO4 – Retail and Leisure Impact assessments	ECO5 – Tourism Activities, Facilities and Accommodation	ECO6 – Holiday Sites	ECO7 – Agriculture Development and Forestry	ECO8 – Agricultural Diversification	ECO9 – Local Employment and Skills	ECO10 – Equestrian developments
Will the policy have a direct impact on health, mental health and wellbeing?	Yes	Yes	No	No	Yes	No	No	No	No	No
Will the policy have an impact on social, economic and environmental living conditions that would indirectly affect health?	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes
Will the policy affect an individual's ability to improve their own health and wellbeing?	Yes	Yes	No	No	Yes	Yes	No	No	No	Yes, potentially
Will there be a change in demand for or access to health and social care services?	Yes	No	No	No	Yes	Yes	No	No	No	No

Full HIA Criteria	ECO1 – Supporting new Employment Development	ECO2 – Protecting existing Employment sites and premises	ECO3 – Designated Town Centres	ECO4 – Retail and Leisure Impact assessments	ECO5 – Tourism Activities, Facilities and Accommodation	ECO6 – Holiday Sites	ECO7 – Agriculture Development and Forestry	ECO8 – Agricultural Diversification	ECO9 – Local Employment and Skills	ECO10 – Equestrian developments
What are the direct impacts on health, mental health and wellbeing? (eg. ill health, social exclusion, isolation, non-participation, safety)	Allows employment opportunities. Direct positive impact on mental health and wellbeing	Allows employment opportunities. Direct positive impact on mental health and wellbeing	No direct impacts	N/A	Ability to create recreational benefits associated with holiday homes	No direct impacts	No direct impacts	No direct impacts	No direct impacts	No direct impacts
What are the indirect impacts on health, mental health and wellbeing? (eg. housing, transport, child development, education, employment opportunities, green space/nature, accessibility, air/noise/light quality and climate change adaption)	Can deliver multiple benefits in providing skills for local people, and climate change mitigation etc	Safeguards employment opportunities, reduces impact on livelihoods and mental health	Economic living conditions will be enhanced through prioritising retail development and main town centre uses so ensuring the vitality of town centre economies.	N/A	Ability for to access green space, provide education and employment associated with holiday parks, to relax and for wellbeing	Ability for ability to enjoy recreational activities associated with holiday parks, to relax and for wellbeing	Allows greater employment opportunities and ensure vitality of farming and agricultural business.	Allows greater employment opportunities and ensure vitality of farming and agricultural business.	Ability to secure local employment for local people, enhancing wellbeing and mental health	Some indirect impacts on amenity, such as restriction on floodlighting
What are the opportunities for self-improvement? (eg. ability to be physically active, choose healthy food, access to services/employment/education)	Better access to a wide variety of services and facilities	Better access to a wide variety of services and facilities	Opportunities for a wider range of town centre services and facilities	N/A	Ability to be physically active, and to be at one with nature	Ability to be physically active, and to be at one with nature	Better access to and more diverse employment opportunities	Better access to and more diverse employment opportunities	Local people can access employment opportunities associated with local developments	Ability to be physically active, recreation and activity benefits
What change in demand for services will there be? (eg. Primary Care, hospital care, community services, mental health, social services)	Demand in services will be produced through new residential development and population growth which is linked to employment growth	Demand in services will be produced through new residential development and population growth which is linked to employment growth	Demand in services will be produced through new residential development and population growth which is linked to employment growth	N/A	Community services will be required to cater for people holidaying on the sites	Community services will be required to cater for people holidaying on the sites	No impacts	No impacts	The change in demand for services will relate to the specific development, not specifically related to the LESP	No change in demand for services overall
What impacts will there be on planetary health? (e.g. climate change mitigation)	Opportunities for climate	No impacts	No impacts	N/A	Opportunities for climate change	Opportunities for climate change	Opportunities for climate change	Opportunities for climate change	No impacts	Opportunities for climate change

	change mitigation and BNG on larger scale developments				mitigation and BNG on larger scale developments	mitigation and BNG on larger scale developments	mitigation and BNG on larger scale developments	mitigation and BNG on larger scale developments		mitigation and BNG on larger scale developments
Who will it effect, and will there be particular impacts on certain vulnerable groups? (e.g. older people, young, disabled, low income)	Will impact all of community, ensuring sustainable access to services and facilities	Will impact all of community, ensuring sustainable access to services and facilities	Will impact all of community, ensuring sustainable access to services and facilities	N/A	Will impact a wide range of both the local community and for people further afield holidaying	Will impact a wide range of both the local community and for people further afield holidaying	Will impact people of the working age and in farming/agricultural industries	Will impact people of the working age and in farming/agricultural industries	Will impact people of the working age, younger apprentices etc	Mainly impact certain groups of society who undertake equestrian activities
How will negative impacts be mitigated?	Impacts on amenity and landscape character will be minimised through the policy	No negative impacts identified	No negative impacts identified	N/A	Impacts on amenity and landscape character will be minimised through the policy	Impacts on amenity and landscape character will be minimised through the policy	Impacts on amenity and landscape character will be minimised through the policy	Impacts on amenity and landscape character will be minimised through the policy	No negative impacts identified	Impacts on amenity and landscape character will be minimised through the policy
How will positive impacts be enhanced?	Climate change mitigation and BNG could be enhanced	Increased employment levels locally, addresses economic deprivation	Increased employment levels locally, addresses economic deprivation	N/A	Climate change mitigation and BNG could be enhanced	Climate change mitigation and BNG could be enhanced	Climate change mitigation and BNG could be enhanced	Climate change mitigation and BNG could be enhanced	Increased skills levels locally, addresses economic deprivation	Climate change mitigation and BNG could be enhanced
Recommendations for policy changes.	No change to policy required	No change to policy required	No change to policy required	No change to policy required	No change to policy required	No change to policy required	No change to policy required	No change to policy required	No change to policy required	No change to policy required

5.11 Landscape Character

5.11.1 The following section of the appraisal relates to the Landscape Character chapter of the Local Plan, and the development of the following policies:

- Proposed Policy LAN1: Rural Environments and Landscape Character
- Proposed Policy LAN2: Trees, Woodlands and Hedgerows
- Proposed Policy LAN3: Dark Skies

5.11.2 The policies in this chapter of the plan are related to the specific landscape features of Rother district, and as such warrant specific policies for their protection. Under this chapter there are proposed policies in relation to the overall rural environment and landscape character features, as well as to features in the landscape such as trees, woodlands and hedgerows. The final policy area is in relation to dark skies which is a specifically important policy approach to the High Weald national landscape and other countryside areas.

5.11.3 The policy options for landscape character are different from other chapters of the Local Plan as for the three key themes, the reasonable alternatives consist of the proposed policy against no policy (and therefore relying on national policy through the NPPF). The Policy options are therefore under each key theme:

Policy Area 1: Rural Environments and Landscape Character

Proposed Policy Option 1A: A standalone policy consolidating the protection the districts landscape and landscape designations must be given when considering development.

Policy Option 1B: No policy, reply on the NPPF

Policy Area 2: Trees Woodlands and Hedgerows

Proposed Policy Option 2A: A standalone policy to introduce increased protection and valuation for the assets

Policy Option 2B: No policy, reply on the NPPF

Policy Area 3: Dark Skies

Proposed Policy Option 3A: Standalone policy to introduce new protections to the nights skies in the district

Policy Option 2B: No policy, reply on the NPPF

5.11.4 The following tables (Figures 51-53) provide a summary of the sustainability appraisal of the policy options as well as a HIA of the proposed policies. This demonstrates the strong sustainability benefits in moving forward with the proposed policies and the merits of proposed policies on health and wellbeing.

Figure 51 : Policy Options Comparison for the Landscape Character 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

SA Objective / Draft Policies	1A	1B	2A	2B	3A	3B
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
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

Figure 52 : Summary of SA Impacts for the Landscape Character 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)
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.

Figure 53 : Health Impact Assessment Framework for Landscape Character Chapter

HIA Screening	LAN1 – Rural environments and landscape character	LAN2 – Trees, Woodland and Hedgerows	LAN3 – Dark Skies
Will the policy have a direct impact on health, mental health and wellbeing?	Yes	Yes	Yes
Will the policy have an impact on social, economic and environmental living conditions that would indirectly affect health?	Yes	Yes	Yes
Will the policy affect an individual's ability to improve their own health and wellbeing?	No	No	No
Will there be a change in demand for or access to health and social care services?	No	No	No

Full HIA Criteria	LAN1 – Rural environments and landscape character	LAN2 – Trees, Woodland and Hedgerows	LAN3 – Dark Skies
What are the direct impacts on health, mental health and wellbeing? (eg. ill health, social exclusion, isolation, non-participation, safety)	Protection of the valued rural landscapes is important for overall health and wellbeing, protecting the important countryside and rural aspect of the district which is important to so many residents	Protection of the key features of the rural landscape is important for overall health and wellbeing, and is important to so many residents	Protection of the rural feel through dark skies is important for overall health and wellbeing, protecting the important countryside and rural aspect of the district which is important to so many residents
What are the indirect impacts on health, mental health and wellbeing? (eg. housing, transport, child development, education, employment opportunities, green space/nature, accessibility, air/noise/light quality and climate change adaption)	Ability to access green space, recreational benefits, tranquillity and importance of landscape character, including the important features of the High Weal National landscape	These areas form important parks and boundaries of green open spaces, therefore assist in recreation and environmental quality	Helps protect against amenity impacts and light pollution. This assist with health and wellbeing, especially mental health and the feeling of being in the countryside as opposed the urban environments
What are the opportunities for self-improvement? (eg. ability to be physically active, choose healthy food, access to services/employment/education)	Ability to lead an active lifestyle and recreation in the landscape settings of the district	No direct impact	No direct impact
What change in demand for services will there be? (eg. Primary Care, hospital care, community services, mental health, social services)	No direct impact	No direct impact	No direct impact
What impacts will there be on planetary health? (e.g. climate change mitigation)	Protection of and enhancement of valued green areas of carbon capture and storage to help with climate change initiatives	Protection of and enhancement of valued green areas of carbon capture and storage to help with climate change initiatives	Less impact of ecosystems, priority habitats and rural environments.
Who will it effect, and will there be particular impacts on certain vulnerable groups? (e.g. older people, young, disabled, low income)	All members of the community will benefit from this policy.	All members of the community will benefit from this policy.	All members of the community will benefit from this policy.
How will negative impacts be mitigated?	Priority will be given to enhancement rather than destruction of landscape features	Priority will be given to enhancement rather than destruction of landscape features	Lighting impacts will be managed through he policy as a key priority
How will positive impacts be enhanced?	Opportunities for BNG and climate change adaptation in appropriate areas	Opportunities for BNG and climate change adaptation in appropriate areas	Supportive policies in the High Weald Management Plan provide further positive policy reinforcement and enhancement.
Recommendations for policy changes.	No policy changes required	No policy changes required	No policy changes required

5.12 Environmental Management

5.12.1 The following section of the appraisal relates to the Environmental Management chapter of the Local Plan, and the development of the following policies:

- Proposed Policy ENV1: Coastal, Water and Flood Risk Management
- Proposed Policy ENV2: Sustainable Surface Water Drainage

- Proposed Policy ENV3: Land Stability
- Proposed Policy ENV4: Fairlight Cove Coastal Change Management Area
- Proposed Policy ENV5: Habitats and Species
- Proposed Policy ENV6: Sustainable Access and Recreation Management Strategy
- Proposed Policy ENV7: Environmental Pollution

5.12.2 The policies in this chapter of the plan are related to the various different planning issues in relation to managing the natural environment from flooding, to managing the coast and land stability. It also includes environmental pollution and managing an important area of influence around the Dungeness complex of habitats sites known as the Sustainable Access and Recreation Management Strategy (SARMS)

5.12.3 The policy options for Environmental Management can be found below:

Policy Area 1: Sustainable Drainage

Policy Option 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

Policy Option 2A: A standalone policy combining existing policies

Policy Area 3: Water efficiency

Policy Option 3A: A standalone policy to just trigger the optional building regulations standard

Policy Option 3B: A standalone policy to both trigger the optional standard as well as seek efficiency measures more generally

Policy Area 4: Land stability

Policy Option 4A: A standalone policy for a district wide approach to land stability

Policy Area 5: Coastal Change Management Areas

Policy Option 5A: A Coastal Change Management Area in the Fairlight Cove area

Policy Option 5B: A Coastal Change Management Area that covers the entirety of Rother's coast

Policy Option 5C: Relocating uses away from the Coastal Change Management Area

Policy Area 6: Habitats and species

Policy Option 6A: A standalone policy looking to cover both legally and non-legally protected habitats and species

Policy Area 7: Environmental pollution

Policy Option 7A: A standalone policy to cover all forms of environmental pollution with specific subpoints for more specific policies on certain forms of pollution

5.12.4 The following tables (Figures 54-56) provide a summary of the sustainability appraisal of the policy options as well as a HIA of the proposed policies. This demonstrates the strong sustainability benefits in moving forward with the proposed policies and the merits of proposed policies on health and wellbeing.

Figure 54 : Policy Options Comparison for the Environmental Management 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.	○	○	○	○	○	○	○	○	○	○

SA Objective / Draft Policies	1a	2a	3a	3b	4a	5a	5b	5c	6a	7a
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
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	8	7	1	2	4	5	7	4	5	7

Figure 55 : Summary of SA Impacts for the Environmental Management 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)
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.

Figure 56 : Health Impact Assessment Framework for the Environmental Management Chapter

HIA Screening	ENV1 – Coastal, Water and Flood Risk Management	ENV2 – Sustainable Surface Water Drainage	ENV3 – Land Stability	ENV4 – Fairlight Cove Coastal Change Management Area	ENV5 – Habitats and Species	ENV6 – Sustainable Access and Recreation Management Strategy	ENV7 – Environmental Pollution
Will the policy have a direct impact on health, mental health and wellbeing?	Yes	No	No	No	No	No	Yes
Will the policy have an impact on social, economic and environmental living conditions that would indirectly affect health?	Yes	Yes	No	Yes	Yes	Yes	Yes
Will the policy affect an individual's ability to improve their own health and wellbeing?	No	No	No	No	No	Yes	Yes
Will there be a change in demand for or access to health and social care services?	No	No	No	No	No	Yes	Yes
Full HIA Criteria	ENV1 – Coastal, Water and Flood Risk Management	ENV2 – Sustainable Surface Water Drainage	ENV3 – Land Stability	ENV4 – Fairlight Cove Coastal Change Management Area	ENV5 – Habitats and Species	ENV6 – Sustainable Access and Recreation Management Strategy	ENV7 – Environmental Pollution
What are the direct impacts on health, mental health and wellbeing? (eg. ill health, social exclusion, isolation, non-participation, safety)	Positive policy on providing safety and protection of life from flooding	Positive policy on providing safety and protection from flooding of property	N/A	No direct impacts	No direct impacts	No direct impacts	Positive policy on avoiding ill health through air and other forms of pollution
What are the indirect impacts on health, mental health and wellbeing? (e.g. housing, transport, child development, education, employment opportunities, green	Protection of property, positive mental health, allows	Protection of property, positive mental health,	N/A	Will have an impact on housing opportunities, wellbeing and mental	Indirect impacts include appreciate and access to open sand green space,	Opportunities for education and access to open space and nature, greater	Opportunities for education and access to open space and nature,

space/nature, accessibility, air/noise/light quality and climate change adaptation)	for climate change mitigation	allows for climate change mitigation		health of residents in the affected area	better quality of life and nature in local areas	understanding of impacts of recreational activities, limiting pollution and opportunities for climate change mitigation	greater understanding of impacts of activities, limiting pollution and opportunities for climate change mitigation
What are the opportunities for self-improvement? (e.g. ability to be physically active, choose healthy food, access to services/employment/education)	No direct impacts	No direct impacts	N/A	No direct impacts, more about planning controls	No direct impacts, not all areas can be publicly accessed	Opportunities to change behaviours in relation to recreational activities	Opportunities to change behaviours, lead healthier lifestyles for the environment
What change in demand for services will there be? (e.g. Primary Care, hospital care, community services, mental health, social services)	No change in demand for services	No change in demand for services	N/A	No change in demand for services	No change in demand for services	Potential change in demand for services and supporting infrastructure	Potential change in demand for services through ill health, greater burden on health care system.
What impacts will there be on planetary health? (e.g. climate change mitigation)	Protects the District's population from flooding, allows climate change mitigation	Protects the District's population from flooding, allows climate change mitigation	N/A	Protects the District's population from flooding and coastal change	Protects important habitats and allows climate change resilience	Protects important habitats and designated areas and allows climate change resilience	Protects the environment from undue harm and therefore impacts mental health and living well
Who will it effect, and will there be particular impacts on certain vulnerable groups? (e.g. older people, young, disabled, low income)	Impacts all groups of society, especially those in vulnerable areas	Impacts all groups of society, especially those in vulnerable areas	N/A	Impacts those living in the vulnerable areas, allows opportunity for relocation, but does control planning rights	Impacts all groups of society equally	Impacts all groups of society equally	Impacts all groups of society equally
How will negative impacts be mitigated?	Supporting infrastructure will be required in areas vulnerable to flood risk	Design of SuDS should not impact amenity	N/A	Allows relocation of residence and support for living in sustainable locations	Impacts on designated areas will be safeguarded through other supporting policies in the Local Plan	Signage to enforce specific walkways and to provide information on the strategy.	Impacts on designated areas will be safeguarded through other supporting policies in the Local Plan, assessed through Habitats Regulations Assessment
How will positive impacts be enhanced?	Biodiversity net gains can be achieved alongside infrastructure delivered	Biodiversity net gains can be achieved alongside infrastructure delivered	N/A	Can link to other initiatives such as the Southern Water Fairlight scheme on land stability	Biodiversity net gains can be achieved	Biodiversity net gains can be achieved alongside climate change mitigation	Opportunities for climate change mitigation
Recommendations for policy changes.	No required changes to policy	No required changes to policy	No required changes to policy	No required changes to policy	No required changes to policy	No required changes to policy	No required changes to policy

5.13 Heritage

5.13.1 The following section of the appraisal relates to the Heritage chapter of the Local Plan, and the development of the following policies:

- Proposed Policy HER1: Heritage Management
- Proposed Policy HER2: Traditional Historic Farm Buildings
- Proposed Policy HER3: Shopfronts, Signage and Advertising

15.3.2 The policies in this chapter of the plan are directly related to the protection and enhancement of the built environment and include a general policy on heritage management along with specific policies on farm buildings and shopfronts, signage and advertising. The Heritage Background paper provides a summary of how the planning policies under this theme were developed and their links to key planning issues for the Local Plan. The policy options which are presented below represent policies that have been brought forward from existing adopted policies, some with slight changes. As there are no identified reasonable alternatives in policy wording the Sustainability Appraisal has assessed the proposed policy against not having a local policy and therefore relying on national policies in the NPPF.

15.3.3 The following tables (Figures 57-59) provide a summary of the sustainability appraisal of the policy options as well as a HIA of the proposed policies. This demonstrates the strong sustainability benefits in moving forward with the proposed policies and the merits of proposed policies on health and wellbeing.

Figure 57 : Policy Options Comparison for the Heritage 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.	○	○	○	○	○	○
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.	○	○	○	○	○	○

SA Objective / Draft Policies	HER1	No HER1	HER2	No HER2	HER3	No HER3
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
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

Figure 58 : Summary of SA Impacts for the Heritage 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)
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 rely 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 rely 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 rely 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.

Figure 59 : Health Impact Assessment Framework for the Heritage Chapter

HIA Screening	HER1 – Heritage Management	HER2 – Traditional Historic Farm Buildings	HER3 – Shopfronts, Signage and Advertising
Will the policy have a direct impact on health, mental health and wellbeing?	No	No	No
Will the policy have an impact on social, economic and environmental living conditions that would indirectly affect health?	Yes	Yes	No
Will the policy affect an individual's ability to improve their own health and wellbeing?	No	No	No
Will there be a change in demand for or access to health and social care services?	No	No	No
Full HIA Criteria	HER1	HER2	HER3
What are the direct impacts on health, mental health and wellbeing? (eg. ill health, social exclusion, isolation, non-participation, safety)	No direct impacts identified	No direct impacts identified	N/A
What are the indirect impacts on health, mental health and wellbeing? (eg. housing, transport, child development, education, employment opportunities, green space/nature, accessibility, air/noise/light quality and climate change adaption)	Ensures quality of the built environment which has positive effects on people's lives, how they use and appreciate space.	Improves economic and environmental conditions for those affected or wanting to use farm buildings.	N/A

What are the opportunities for self-improvement? (eg. ability to be physically active, choose healthy food, access to services/employment/education)	No identified impacts	No identified impacts	N/A
What change in demand for services will there be? (eg. Primary Care, hospital care, community services, mental health, social services)	None identified	None identified	N/A
What impacts will there be on planetary health? (e.g. climate change mitigation)	None identified	None identified	N/A
Who will it effect, and will there be particular impacts on certain vulnerable groups? (e.g. older people, young, disabled, low income)	This should impact all members of society equally	This should impact all members of society equally	N/A
How will negative impacts be mitigated?	Design policies and other national policy considerations would safeguard any harm	Design policies and other national policy considerations would safeguard any harm	N/A
How will positive impacts be enhanced?	Opportunity for greater accessibility to built heritage for wellness and enjoyment	Opportunities for great gains, climate change mitigation, BNG etc	N/A
Recommendations for policy changes.	No required changes to policy	No required changes to policy	No required changes to policy

6. SUMMARY OF SUSTAINABILITY AND HEALTH AND WELLBEING IMPACTS

6.1 Summary of Likely Significant Effects of Proposed Planning Policies and Alternatives against the SA Objectives

6.1.1 A summary of the significant social, environmental and economic effects of the Local Plan policies is presented below by each individual SA Objective.

1) Reduce air pollution from transport and development and improve air quality

6.1.2 Overall, the significant effects on this SA Objective are neutral. Whilst the intentions of the draft Local plan policies within the ‘Green to the Core’ and ‘Live Well Locally’ chapters are to promote sustainable transport alternatives and respond positively to climate change, it is inevitable that air pollution will increase due to new development (construction and occupation) and resulting traffic movements. Over time the impacts of this growth can be reduced through a modal shift in transport use to active and sustainable travel, as well as improvements being made to reduce air pollution through construction. The long-term intentions of proposed policies in the plan on climate change through ‘Green to the Core’ and ‘Live Well Locally’ will help reduce the air pollution impacts, but will not eradicate or necessarily improve air quality.

2) Biodiversity is protected, conserved and enhanced.

6.1.3 Overall, the significant effects of the plan on the biodiversity objective are positive. The positive effects stem from a number of new policies that help deliver the ‘Green to the Core’ ambitions of the Plan, including biodiversity net gain. Green infrastructure improvements will be promoted through the proposed environmental policies and important designated areas for their ecology and wildlife will be protected and effectively managed. There are clear opportunities for biodiversity net gain firstly on proposed development sites, with off-site delivery on identified appropriate sites including Local Wildlife Sites and other local designations, to ensure long-term management and effective retention of important biodiversity.

3) The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation)

6.1.4 Overall, the significant effects of the plan on this objective are positive. The Local Plan seeks to positively address the causes of climate change and respond to its impacts. The suite of climate change policies within the 'Green to the Core' section of the plan helps to deliver these to enable a contribution to the radical reduction of carbon emissions from residents and industry across the district and nationally. The Council is being bold and ambitious in its approach to climate change through its draft policy. But recognises that retrospective changes cannot be delivered through planning as they are outside planning policy controls. The Council's Climate Strategy 2023 states that Rother will use its powers and influence to make the district climate-resilient, and reduce emissions to net zero, by 2030. There is further opportunity to support local and small-scale interventions within local communities, and policies throughout the plan along with the neighbourhood planning process would support this.

4) Minimise water consumption

6.1.5 Overall, the significant effects of this plan on this objective are positive. Proposed policies on water consumption would require an optional higher housing standard for water efficiency. This is however difficult to control solely through planning policy and relies on other outside interventions from water companies to support methods and infrastructure to reduce 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

6.1.6 Overall, the significant effects of the plan on this objective are positive. Through the Council's development strategy and considering appropriate locations for development, it has been critical to look outside areas of the highest flood risk for all sources of flooding. This follows the sequential approach to locating development in line with national policy guidance. The Council is proposing stronger policies in the Local Plan in relation to coastal management through the development of an identified Coastal Change Management Area, along with stronger policies on sustainable drainage, especially in environmentally sensitive areas. With regards to climate change impacts the 'Green to the Core' chapter of the plan makes a step change in policy to respond to the climate emergency and highlights this as a key priority. The Council's Draft Housing and Employment Land Availability Assessment (HELAA) has assessed flood risk as part of the suitability of

sites. Future site allocations in the next version of the plan will take a sequential approach in site identification to ensure sites outside of flood risk are considered first.

6) The risk of coastal erosion is managed and reduced, now and in the future.

6.1.7 Overall, the significant effects of the plan on this objective are positive. As stated above, the Council is proposing stronger policies in the Local Plan in relation to coastal management through the development of an identified Coastal Change Management Area (CCMA), in line with national policy requirements. The proposed policy approach identifies the area of Fairlight as requiring protection as this area of the coast is not protected through 'hold the line' in the Shoreline Management Plans. The Council is gathering an enhanced evidence base on coastal erosion through development of new Shoreline Management Plans and the map-based visualisation tool called MSP-Explorer which makes data more accessible. The CCMA will mean that certain types of development will not be allowed within the designated zone and existing residential uses will be supported for relocation. For other areas of the district, ongoing coastal protection will be maintained in line with the Shoreline Management Plans, and supportive policies are promoted through the environmental management policies of the Local Plan.

7) The health and well-being of the population is improved and inequalities in health are reduced.

6.1.8 Overall, the significant effects of the plan on this objective are strongly positive. Health and well-being is an important golden thread that runs throughout the Local Plan, being a key consideration in the development of planning policies. Informal engagement has taken place with East Sussex Public Health to help shape the policies and link to wider public health benefits. The development of new policies such as requiring Health Impact Assessments on the appropriate scale of development, and undertaking a HIA as part of the whole SA/SEA process of the Local Plan means that this objective is strongly delivered. Whilst the overall health of local residents will be improved through the development of 'green to the core' and 'live well locally' policies, there is also specific focus on areas of deprivation and where wider determinants indicate that health and wellbeing issues are more pronounced.

8) More opportunities are provided for everyone to in a suitable home to meet their needs.

6.1.9 Overall, the significant effects of the plan on this objective are positive. The delivery of all types of housing to meet local need is a key priority of the Local Plan. The need for affordable housing is significantly high, above that which the Council has been able to deliver in overall housing numbers over the past few years. The Plan seeks to strike an appropriate balance between ensuring overall development viability and delivering affordable housing where it is required. In order to maximise supply, the Local Plan is supported by a comprehensive assessment of approximately 1000 sites as part of the HELAA process. This results in a list of sites that are developable or have potential subject to further testing and considerations. This potential will be further explored and confirmed as the Local Plan progresses. The proposed policies in the housing chapter support an appropriate size, design and standard of development to ensure that everyone has a suitable home that is sustainable, capable of adaptation, and therefore suitable for their lifetime.

9) All sectors of the community have improved accessibility to services, facilities, jobs, and social and cultural opportunities.

6.1.10 Overall, the significant effects of the plan on this objective are positive. The Council seeks to ensure through its 'live well locally' and development strategy policies that development is located in sustainable locations with good access to services and facilities. Whilst there are several existing dwellings in isolated countryside location, the development strategy seeks to focus development in five core sub-areas which are focused across key transport hubs and provide various levels of sustainable travel alternatives. Some facilities and services will need to be accessed in neighbouring settlements, and there will be a certain level of dependency on the car, but proposed policies will support the improvement in cycling, walking and wheeling provision which will make all services more accessible. Main town centre uses (including leisure and culture) will be supported in the designated town centre areas which will be accessible by public transport. There are also opportunities for residents to access facilities and services outside of the District in nearby towns and villages in neighbouring authorities.

- 10) Safe and secure environments are created and there is a reduction in crime and fear of crime.
- 6.1.11 Overall, the significant effects of the plan on this objective are positive. The ‘Live Well Locally’ chapter includes proposed policies on Built Form and Streets for All as well as the Health and Wellbeing chapter policies which support safe and secure environments. The Local Plan promotes creating well designed new development which will improve safety and reduce crime and the fear of crime.
- 11) Historic environment/ townscape is protected, enhanced and made more accessible.
- 6.1.12 Overall, the significant effects of the plan on this objective are positive. Proposed Heritage policies are identified as having positive effects on townscape and built environment. Proposed policies HER1-3 have a notably positive effect on the built landscape and heritage management, with landscape character and the High Weald National Landscape represented significantly in the Green to the Core and Landscape Character chapter policies.
- 6.1.13 Although many potential development sites indicated in the development strategy are greenfield sites within the High Weald itself. This is because sites have been rigorously assessed to avoid negative landscape impacts as far as possible, including negative impacts on key features of the High Weald. In any future allocation of sites, positive treatments will include landscaping to enhance the immediate environment.
- 12) The risk of pollution to land and soils is reduced and quality is improved.
- 6.1.14 Overall, the significant effects of the plan on this objective are positive. The Local Plan proposes strong detailed policies in relation to environmental pollution (ENV7) and Land Stability (ENV3). The policies will ensure that development will have no adverse impact on health, local amenities, biodiversity and environmental character as a result of considering a full range of environmental pollutants. Environmental pollution issues will vary depending on the location and type of development involved, but in all cases it is important to consider the full effects of the proposals

13) Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced.

6.1.15 Overall, the significant effects of the plan on this objective are neutral. The Local Plan proposes specific policies to support the minimisation of waste, for example Policy GTC3 Construction materials and waste. The Local Plan seeks to ensure that the sustainability of development includes the construction phase, and that development proposals look to reuse land and buildings wherever feasible, reuse and recycle materials, implement appropriate design methods and ensure appropriately designed space is provided for recycling of domestic waste. Whilst this is a positive measure it is challenging to ensure overall that waste production is reduced.

6.1.16 There are two household waste recycling facilities within the District – at Mountfield (on the A21 north of Battle) and at Pebsham (Between Bexhill and Hastings). It is difficult for all potential development locations to be truly accessible to these two sites, although to a secondary extent they may be accessible to the more numerous smaller ‘bring’ recycling sites. The overall effects are therefore considered to be neutral.

14) The risk of pollution to water is reduced and water quality is improved

6.1.17 Overall, the significant effects of the plan on this objective are positive. Ensuring that robust and resilient water supplies and wastewater infrastructure is in place is both essential to the district’s residents and businesses, and critical to support growth. There are many challenges in place. These include safeguarding water sources from the threat of pollution, reducing usage, and meeting the challenge of climate change.

6.1.18 The Local Plan’s proposed policies are strengthened and ensure that all forms of pollution are taken account of, especially in policy ENV7 Environmental pollution. The importance of water management and water quality is clearly reflected in policies ENV2 and 3, and therefore the overall effects are positive.

15) Ensure that Parks, gardens and countryside are protected, enhanced and made more accessible

6.1.19 Overall, the significant effects of the plan on this objective are positive. The Local Plan consolidates the protection, enhancement and provision of all green and blue infrastructure in proposed Policy HWB5. The policy helps plays a key role in

boosting the vitality of communities and has a direct positive impact on physical and mental health together with overall wellbeing. The policy helps establish a network of natural spaces for biodiversity and environmental benefits which link to other Green to the Core and landscape character policies within the Local Plan. Proposed Policy LAN1 Rural Environments and Landscape Character provides protection for areas of high landscape value across the rural areas of the district.

16) Economic performance is improved

6.1.20 Overall, the significant effects of the plan on this objective are positive. The Local Plan sets a target of employment floorspace to be delivered by 2040, which is evidenced in the Council's Housing and Economic Development Needs Assessment (HEDNA). The Plan has a potential supply which is higher than this need, which allows flexibility for changing circumstances on sites and allows strategic choices of site allocations for the next version of the Local Plan. A series of policies in the economy chapter of the Local Plan promote the development and retention of employment uses across the district. Such policies allow further economic development in key areas of the district such as town centres, within development boundaries and in appropriate locations in the countryside. The strengthened policies are considered to allow economic performance to thrive and as such the policies provide a positive effect on this objective.

17) There are high and stable levels of employment and diverse employment opportunities for all

6.1.21 Overall, the significant effects of the plan on this objective are positive. The assessment is similar to Objective 16. The Local Plan's economy chapter contains strengthened proposed policies to protect and retain existing employment sites and sites of social or economic value. There is specific policy support to support Local Employment and Skills. The HEDNA concludes that the lack of local skills particularly in the construction sector plays a role in restricting the development of the housing and other uses, and the upskilling of local residents is therefore a key objective of the Local Plan. The Council responds to this by setting a clear policy which seeks developer contributions from qualifying developments to implement and monitor Local Employment and Skills training, working in partnership with the Council's regeneration team. The live well Locally policies in combination with the economy policies in the Local Plan are considered to have a positive effect on this objective.

18) Levels of poverty and social exclusion are reduced, and the deprivation gap is closed in the more deprived areas.

6.1.22 Overall, the significant effects of the plan on this objective are positive. The proposed policies in the Live Well Locally and Health and Wellbeing policy, together will have a positive impact on this objective. The Council has identified the 4 wards of the district which are within the 20% most deprived wards nationally, and this ensures that qualifying developments respond to identified impacts through in a Health Impact Assessment. The support for retention and protection of sites of community and economic value as well as designing out crime are important considerations referenced in policies of the Local Plan. There are important considerations within Building for Healthy Lives, which are referenced in Live Well Locally policies LWL5 Distinctive Places and LW6 Built Form.

19) Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve

6.1.23 Overall, the significant effects of the plan on this objective are positive. The assessment is similar to Objective 16 and 17. The Council responds to this by setting a clear policy which seeks developer contributions from qualifying developments to implement and monitor Local Employment and Skills training, working in partnership with the Council's regeneration team. The live well Locally policies in combination with the economy policies in the Local Plan are considered to have a positive effect on this objective. A series of policies in the economy chapter of the Local Plan promote the development and retention of employment uses across the district. Such policies allow further economic development in key areas of the district such as town centres, within development boundaries and in appropriate locations in the countryside. The strengthened policies are considered to allow economic performance to thrive and as such the policies provide a positive effect on this objective.

20) Road congestion levels are reduced and there is less car dependency and greater travel choice.

6.1.24 Overall, the significant effects of the plan on this objective are neutral. The intention of policies in the Local Plan through Live Well Locally is that sustainable alternative forms of travel are provided locally and that people are able to lead their lives in a sustainable local way. In it inevitable that car usage will still take

place for longer journeys including commuting to work and for activity based travel. Through the delivery of essential transport infrastructure to support development proposed in the plan (to be confirmed at the next stage of the Local Plan), road congestion levels should be alleviated, with more sustainable forms of travel provided at a local level where feasible and in support of larger major development sites in locations within towns and villages. The significant effects of the plan on this are currently unknown in detail and as such currently this is assessed as neutral, to be reviewed at the next stage of the Local Plan.

6.2 Cumulative and Synergistic Effects

Cumulative Effects

6.2.1 The cumulative effects are those that result from the interaction of all policies and policy options, and also with other plans, policies and programmes.

6.2.2 Consequently, the adverse impacts of some policies on a particular SA Objective may be outweighed by the benefits of others. Indeed, section 5.2 highlighted (and in individual sustainability assessments of policies), on an objective by objective basis, that whilst overall effects may be positive and beneficial, there may still be discrete negative effects from individual policies.

6.2.3 Section 5.2 demonstrated the policies in the entirety of the Local Plan address the majority of SA Objectives in a positive, supportive manner and contribute to the achievement of them. However, there are two SA Objectives in particular that could suffer from cumulative, potentially adverse effects from the implementation of the Local Plan and the supporting development strategy, these being:

- **Reduce Road Congestion** - road congestion levels are reduced and there is less car dependency and greater travel choice
- **Reduce Air Pollution** - Reduce air pollution from transport and development and improve air quality

6.2.4 Inevitably, road congestion and use of the private car is something that planning only has so much ability to influence; since individuals are free to exercise their choice to use the private car, no matter how much the built environment is planned to incentivise alternative transport modes and no matter how supportive policy approaches are in the Local Plan. This is an inherent difficulty in the process.

For this reason, while individual policies and identified sites may receive positive scores for endeavouring to facilitate travel choice, the cumulative effect across the plan area may still be negative in the long term, simply due to increases in population and the relative convenience of the private car.

- 6.2.5 Reducing road congestion may be achievable through certain policies in the Local Plan but this would not necessarily ensure air quality in the District as a whole continues to improve. This may be because over time new roads, junctions and linkages that initially relieve congestion have the effect, in combination with new development, of generating traffic and increasing overall car levels in the district and consequently air pollution. Indeed pollution from the construction phase of development could also cause harm to the environment. Strategies that aim to improve economic growth including within the tourism sector are likely to bring more traffic into the district, which due to road improvements, may not contribute to congestion but would contribute to overall emissions and pollution levels.

Synergistic Effects

- 6.2.6 Synergistic effects can be described as those that are greater than the sum of the individual effects. They are identified in the summary of policy options as part of the sustainability appraisal process.
- 6.2.7 There are several examples of positive synergistic effects in the Local Plan, including the following:
- 6.2.8 *The promotion of sustainable forms of transport (e.g. bus, train, walking, cycling) as a means to reduce road congestion.*

This has multiple positive synergistic effects. Public transport routes and providers may benefit from increased patronage and become more economically viable as a consequence. Residents, when given the opportunity to safely walk or cycle, are more likely to do so, benefitting their health in the process. In turn, locally accessible services may reap the benefits of increased custom, be more viable and more likely to remain operating –benefitting the local economy, community cohesion and social inclusion as a result. As a consequence of these synergies, the overall cumulative effects are overwhelmingly positive.

6.2.9 *The promotion of SuDS to reduce flood risk.*

This may have a synergistic benefit for ecology and biodiversity via the creation of ponds, wetland habitats and green roofs, which in turn have an educational value 'on the doorstep' of residential areas, increasing awareness of ecological issues. Several protected species (such as the Great Crested Newt) rely on wetland habitats. SuDS may also benefit the character of the High Weald National Landscape designation, for which ponds are a key character feature. If sensitively designed, SuDS may provide good quality amenity spaces for the enjoyment of residents, in turn benefitting their health and quality of life. The provision of good quality green and blue infrastructure has even been demonstrated to have economic benefits, enhancing the attractiveness of locations as a place to live and to work.

6.2.10 *Protecting and enhancing the high quality built environment.*

Protecting, enhancing and avoiding negative impacts upon sites and features of historical, archaeological or cultural interest is an important goal in its own right. Another consequence may be in promoting tourism to the area, which is in turn beneficial to the local economy. The employment opportunities generated by the tourist economy may in turn help reduce wider deprivation issues.

6.2.11 *The development of Live well Locally measures that have positive effects on Green to the Core policies and responding to climate change*

The proposed Live well locally policies in relation to design, community facilities and parking arrangements on development sites for instance are all interrelated to the green to the core section of the Local Plan. There are clear synergistic effects in the policies, where for instance sustainability measures in parking areas for cycle storage and electric vehicle charging points, directly relates to green to the core policies in responding to climate change.

6.3 Ways of Mitigating Adverse Effects and Maximising Beneficial Effects

The Scope and Role of Mitigation

6.3.1 This chapter, in accordance with the SEA Directive, SEA and SA guidance, looks at mitigation measures designed to prevent, reduce or offset the significant adverse environmental, social and economic effects of the Plan and its policy components.

Mitigation measures can also include recommendation for enhancing the beneficial effects of policies.

- 6.3.2 As highlighted in previous section (Figure 5) of the report, there is an inherent incompatibility of some SA objectives, particularly between SA objectives 8 (housing) and 13 (waste disposal), and 8 (housing) and 20 (road congestion and car dependency). Therefore it is not possible to mitigate all negative effects.
- 6.3.3 Mitigation measures on a site-specific scale has not yet been considered as the Local Plan is not advanced to a site allocations stage. This will be presented within the SA report of the next stage of the Local Plan.
- 6.3.4 However, other policies (or policy options presented in this SA report) would provide a mitigating role for the plan as a whole, as discussed below.

Mitigating DaSA Policies

- 6.3.5 The following policies are considered to have a key role in limiting potentially damaging impacts of the plan as a whole:
- *Policy GTC1: Net Zero Building Standards*
 - *Policy GTC2: Net Zero Retrofit standards*
 - *Policy GTC4: Water Efficiency*
 - *Policy GTC6: Renewable and Low Carbon Energy*
 - *Policy GTC8: Biodiversity Net Gain*
 - *Policy GTC9: High Weald National Landscape*
 - *Policy HWB1: Supporting Health and Wellbeing*
 - *Policy HWB2: Health Impact Assessments*
 - *Policy HWB3: Reducing Harmful Impacts on Health*
 - *Policy LAN1: Rural Environments and Landscape Character*
 - *Policy ENV2: Sustainable Surface Water Drainage*
 - *Policy ENV3: Land Stability*
 - *Policy ENV4: Fairlight Cove Coastal change Management Area*
 - *Policy ENV7: Environmental Pollution*

Other Statutory Documents

- 6.3.6 Reference may also be made to proposed mitigation within other plans of partner organisations, including:

- The ESCC Local Transport Plan (in terms of encouragement of sustainable transport options and modal shift, measures to address congestion); and
- The ESCC Waste & Minerals Plan, in terms of waste reduction, promotion of sustainable resource management, etc.
- The High Weald AONB Management Plan, in terms of measures promoting the preservation and enhancement of the character of the designation (which covers 83% of Rother district).

6.4 Relationship to the Draft HELAA, the site assessment process and future site allocations

- 6.4.1 The conclusions of the SA/SEA process are intended to give an overview of the suitability of sites for particular uses in terms of broad sustainability principles. These must be interpreted in conjunction with the more detailed site assessments made within the Council's Draft HELAA, as referred to in previous sections. The Draft HELAA has taken account of the full evidence base for the plan which should also be referred to. This has been published in support of the Regulation 18 consultation stage of the Local Plan.
- 6.4.2 This SA report has assessed the identified sites and potential sites that have been presented in the Local Plan and forms part of the proposed development strategy numbers, along with existing completions and windfall development. The SA forms a crude assessment of the overall sustainability of such sites coming forward within the development strategy. It has also been appropriate to assess through the SA, other sites that have been submitted to the Council and consider them as 'reasonable alternatives' as we know through the call for sites process that these sites are 'available'. The sustainability assessment of these sites matches the conclusions of the Draft HELAA in that as these sites are constrained and are not developable, their sustainability scoring is lower and negative under the environmental objectives of the SA.
- 6.4.3 The Council is consulting directly on the identified and potential sites through the Regulation 18 stage of the Local Plan. There are specific consultation questions in relation to sites within the development strategy of the Local Plan and the Council's draft HELAA is published in order that responses can be made on the assessment of sites. The Council will consider the consultation responses and the full evidence base at the next stage of the Local Plan so that it can progress with proposals for specific site allocations. These sites will be subject to further SA and

assessment at the next stage of the Local Plan which will be supported by a full SA report.

6.5 Summary of Health and Wellbeing Impacts

- 6.5.1 The Council have fully integrated into the SA Interim report the important process of assessing proposed policies against a set of agreed health and wellbeing criteria. The integration is considered to be mutually beneficial as the SA process has identified where there are health and wellbeing issues and impacts, which have then been further elaborated and explored through a distinct set of Health Impact Assessment criteria. This criteria has identified if the impacts are direct or indirect and if they have any wider strategic impacts on health and wellbeing.
- 6.5.2 The Council have engaged directly with East Sussex County Council's Healthy Places team in the development of specific policies in the Local Plan such as the Live Well locally, development strategy and Health and Wellbeing chapters as well as developing a clear assessment matrix for the HIA to test proposed policies in the Local Plan. This process will be rolled forward at the next stage of the Local Plan and any feedback received through consultation be integrated into the wider assessment of policies.
- 6.5.3 The process of HIA has demonstrated that whilst there were specific health and wellbeing impacts recorded, these were largely positive impacts which could be amplified by other supporting policies in the Local Plan. The summary tables for HIA after each policy area show that the Council considers that no changes are required to the proposed policies at this stage to address health and wellbeing, which reflects strong collaboration and the strength of policies to support overarching health and wellbeing objectives for the Local Plan. There are clear synergies in the Council's step change in policies relating to the environment such as climate change mitigation, biodiversity net gain and responding to unhealthy uses which enable positive health and wellbeing impacts to be maximised.

7. CONSULTATION AND MONITORING

7.1 Consultation

The Statutory Environmental Bodies (SEBs)

7.1.1 Regulation 4 of the Environmental Assessment of Plans and Programmes Regulations 2004 defines certain organisations with environmental responsibilities as consultation bodies. In England the consultation bodies or ‘SEBs’ (Statutory Environmental Bodies) are:

- Historic England³
- Natural England and
- The Environment Agency

Consultation on the Local Plan SA Scoping Report

7.1.2 With reference to Figure 1 (earlier within the report, in relation to the key stages in the SA process) Task A5 required the planning authority to consult the consultation bodies or SEBs on the Sustainability Appraisal Scoping Report. Rother District Council worked jointly with Hastings Borough Council to prepare joint SA/SEA Scoping Report for the respective Local Plans. This document presented the SA framework which will be used to assess the development of policy options as the Local Plan progresses. Targeted consultation on the SA/SEA Scoping Report took place on Friday 17 April to 29 May 2020.

7.1.3 Although not required by the Act (2004), in order to ensure the approach taken to the SA is most appropriate for the Local Plan, comments were also sought from other organisations related to health, Transport, and accessibility along with potential cross-boundary issues which need cooperation with neighbouring authorities. The following organisations were also consulted:

- East Sussex County Council;
- East Sussex NHS Clinical Commission Group;
- Sport England;
- Highways England;
- Marine Management Organisation;
- South East Coastal Group; and

³Title from 01/04/15, formerly known as English Heritage.

- Other authorities neighbouring RDC: Tunbridge Wells Borough Council, Ashford Borough Council, Wealden District Council and Folkestone and Hythe District Council.

7.1.4 Appendix A to the SA/SEA Scoping Report provides the responses that were received as part of the consultation stage and Appendix B provides the revised and confirmed SA framework which is used for the basis of appraising the Local Plan. The final SA/SEA Scoping Report and appendices were made available on the Council's website in the Summer of 2020.

Consulting on the Interim SA for the Local Plan

7.1.5 The above section set out who should be consulted on the *Scoping Report*. With regard to this first main interim SA assessment of the Local Plan, the local planning authority must consult the consultation bodies and 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 Environmental Assessment of Plans and Programmes Regulations 2004.

7.1.6 The PPG sets out that the local planning authority may also want to consult those they are inviting representations from, as part of the development of the Local Plan itself. The sustainability appraisal report (including any non-technical summary) must be published alongside the draft Local Plan for a minimum of six weeks.

7.1.7 Therefore, this SA Interim Report will be available for public consultation alongside the Rother Local Plan 2020-2040 Draft (Regulation 18) Version, as a key supporting document.

7.2 Monitoring

7.2.1 With reference to the key stage of the SA, Task B5 requires the SA to 'Propose measures to monitor the significant effects of implementing the Local Plan'.

7.2.2 The specific requirements of the SEA Regulations on monitoring are to:

"Monitor the significant environmental effects of the implementation...with the purpose of identifying unforeseen adverse effects at an early stage" (Regulation 17(1))".

This will enable local planning authorities to identify unforeseen adverse effects at an early stage and to enable appropriate remedial actions.

- 7.2.3 The sustainability framework (Section 4.1) is a good starting point for developing targets and indicators for monitoring.
- 7.2.4 Baseline information for Rother's SA has previously been published within the Local Plan Scoping Report (2020), the Updated Baseline Information is annually reviewed as part of the Council's Local Monitoring Report and this can be found in Section 8. Sustainability Appraisal Monitoring Tables. The most recent monitoring report can be found at on [the Council's Monitoring webpage](#). This demonstrates the continuous monitoring process that is place in support of Rother's Sustainability Appraisal.
- 7.2.5 The Council considers the monitoring process for the SA integral as part of the wider monitoring process for the Local Plan. The SEA Regulations specifically state that monitoring for SEA can be incorporated into other monitoring arrangements (Regulation 17(2)), and therefore is combined with the regular monitoring of the Local Plan.



**Rother District Council
Town Hall
Bexhill-on-Sea
East Sussex
TN39 3JX**